



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Mark R. Herring
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120
7-1-1

MEMORANDUM

TO: Dr. David Brown
Director
Virginia Department of Health Professions

FROM: James E. Rutkowski
Assistant Attorney General

DATE: June 8, 2020

SUBJECT: *Regulations Governing the Practice of Pharmacy*
Regulations Governing the Licensure of Pharmacists and Registration of
Pharmacy Technicians
Regulations for Practitioners of the Healing Arts to Sell Controlled
Substances
Regulations Governing Wholesale Distributors, Manufacturers, Third-
Party Logistics Providers, and Warehouseurs
Regulations Governing Pharmaceutical Processors
18VAC110-20; 18VAC110-21; 18VAC110-30; 18VAC110-50;
18VAC110-60

I have reviewed the amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18VAC110-21, *Regulations for Practitioners of the Healing Arts to Sell Controlled Substances*, 18VAC110-30, *Regulations Governing Wholesale Distributors, Manufacturers, Third-Party Logistics Providers, and Warehouseurs*, 18VAC110-50, and the *Regulations Governing Pharmaceutical Processors*, 18VAC110-60, as adopted by the Board of Pharmacy on May 18, 2020. The Board has the statutory authority to adopt these regulations under Virginia Code §§ 2.2-4805 and 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.