



COMMONWEALTH of VIRGINIA

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MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: November 9, 2020

SUBJECT: *Regulations Governing the Practice of Pharmacy; Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*
18 VAC 110-20; 18 VAC 110-21

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18 VAC 110-20, and the *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18 VAC 110-21, which were adopted by the Board of Pharmacy on September 9, 2020. The Board has the authority to adopt the regulations as emergency regulations under 2020 Va. Acts. Ch. 102, and Virginia Code §§ 54.1-2400, 54.1-3300, and 54.1-3321. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.