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**MEMORANDUM**

**TO:** Mira Signer  
Acting Commissioner  
Department of Behavioral Health and Developmental Services

**FROM:** Braden J. Curtis  
Assistant Attorney General

**DATE:** August 29, 2019

**SUBJECT:** *Rules and Regulations for Licensing Providers by the Department of Behavioral Health and Developmental Services*  
Allowing a grace period for documentation of ISPs  
12VAC35-105-675

I have reviewed the proposed amendment to 12VAC35-105-675 of the *Rules and Regulations for Licensing Providers by the Department of Behavioral Health and Developmental Services*, which was adopted by the Board of Behavioral Health and Developmental Services on July 17, 2019. The Board has the authority to adopt this amendment pursuant to Virginia Code § 37.2-203. The proposed amendment to this regulation is constitutional and does not conflict with existing federal or state laws or regulations.