



COMMONWEALTH of VIRGINIA
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MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: March 25, 2022

SUBJECT: Periodic Review of the *Regulations Governing Delegation to an Agency Subordinate*
18VAC115-15

In accordance with Virginia Code § 2.2-4017, I have reviewed the *Regulations Governing Delegation to an Agency Subordinate*, 18VAC125-15. These regulations are undergoing periodic review. In my opinion, the Board of Counseling had the authority under Virginia Code § 54.1-2400 to adopt the current regulations, and the Board of Counseling has the authority to amend the regulations.