



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Jason S. Miyares
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services

MEMORANDUM

TO: Arne Owens
Director
Virginia Department of Health Professions

FROM: M. Brent Saunders
Senior Assistant Attorney General

DATE: October 25, 2023

SUBJECT: Periodic Review of the *Public Participation Guidelines*
18VAC65-11

In accordance with Virginia Code §§ 2.2-4007.1 and 2.2-4017, I have reviewed the *Public Participation Guidelines*, 18VAC65-11. These public participation guidelines are undergoing a required four-year periodic review. In my opinion, the Board of Funeral Directors and Embalmers had the authority under Virginia Code §§ 2.2-4007.02 and 54.1-2400 to adopt the current regulations, and has the authority to conduct the periodic review and amend the regulations.