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MEMORANDUM

TO: William L. Harp, M.D.
Executive Director

FROM: Erin L. Barrett
Assistant Attorney General

DATE: July 23, 2012

SUBJECT: *Regulations Governing the Practice of Behavior Analysis*
18VAC85-150

I have reviewed the proposed Regulations Governing the Practice of Behavior Analysis, 18VAC85-150, as adopted by the Board of Medicine on June 21, 2012. The Board has the statutory authority to promulgate these Emergency Regulations under Virginia Code §§ 54.1-2400 and 54.1-2957.16. The proposed Emergency Regulations are constitutional and do not conflict with existing federal or state laws or regulations.