



**COMMONWEALTH of VIRGINIA**  
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October 12, 2004

Elizabeth A. Carter, Ph.D.  
Executive Director  
Virginia Board of Optometry  
6603 West Broad Street  
Richmond, VA 23230-1712

**RE: 18 VAC 105-20-10 et seq.**  
**Regulations Governing the Practice of Optometry**

Dear Dr. Carter:

I have reviewed the proposed regulation, 18 VAC 105-20-10 et seq., in accordance with the Administrative Process Act, as adopted by the Board of Optometry at its meeting on October 6, 2004. The amended regulations relating to delegation of informal fact-finding to an agency subordinate are constitutional and in conformity with statutory provisions of Chapter 64 of the 2004 Acts of the Assembly.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily O. Wingfield".

Emily O. Wingfield  
Assistant Attorney General

c: Elaine J. Yeatts, Agency Regulatory Coordinator  
Department of Health Professions