



COMMONWEALTH of VIRGINIA

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MEMORANDUM

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

FROM: Charis A. Mitchell
Assistant Attorney General

DATE: October 30, 2020

SUBJECT: *Regulations Governing the Practice of Optometry*
18 VAC 105-20-47

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Optometry*, 18 VAC 105-20-47, that were adopted by the Virginia Board of Optometry on October 16, 2020. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch pursuant to Virginia Code §§ 2.2-4002(A)(14) and 54.1-3223. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400 and 54.1-3223. The proposed regulations are constitutional and do not conflict with existing federal or state laws or regulations.