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**MEMORANDUM**

**TO:** Caroline D. Juran, RPh  
Executive Director  
Virginia Board of Pharmacy

William L. Harp, MD  
Executive Director  
Virginia Board of Medicine

**FROM:** Erin L. Barrett  
Assistant Attorney General

**DATE:** February 21, 2014

**SUBJECT:** *Regulations Governing the Practice of Pharmacy*  
18VAC110-40

I have reviewed the amendments to the Regulations Governing the Practice of Pharmacy, 18VAC110-40, which have been submitted as an exempt action. The proposed amendments, which make changes to terms in the definition of "collaborative practice agreements" and provide for the appointment of alternate pharmacists to operate under the agreement if certain conditions are met, are exempt in accordance with Va. Code § 2.2-4006(A)(4)(a). The Boards of Pharmacy and Medicine have the statutory authority to amend these Regulations under Va. Code §§ 54.1-3300.1 and 54.1-2400(6). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.

