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MEMORANDUM

- TO: Dr. David Brown Director Virginia Department of Health Professions
- FROM: James E. Rutkowski Assistant Attorney General
- **DATE:** December 1, 2020
- **SUBJECT:** Regulations Governing Pharmaceutical Processors 18VAC110-60

I have reviewed the proposed *Regulations Governing Pharmaceutical Processors*, 18VAC110-60, which were adopted by the Board of Pharmacy on September 9, 2020. The Board has the authority to adopt the regulations as emergency regulations under 2020 Va. Acts. Ch. 1278, and Virginia Code §§ 54.1-2400, 54.1-3408.3 and 54.1-3442.5 through 54.1-3442.8. The proposed amendments are constitutional and do not conflict with existing state laws or regulations.