



**COMMONWEALTH of VIRGINIA**  
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**MEMORANDUM**

**TO:** Arne Owens  
Director  
Virginia Department of Health Professions

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** August 25, 2023

**SUBJECT:** *Regulations Governing the Practice of Pharmacy*  
18VAC110-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, that were adopted by the Board of Pharmacy on June 13, 2023. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under Va. Code § 2.2-4006(A)(4)(a) because the Board of Pharmacy is deleting from the regulations drugs that have been added to Schedule I pursuant to Chs. 188 and 189 of the 2023 Acts of the Assembly. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.