



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

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

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

**DATE:** September 22, 2014

**SUBJECT:** *Regulations Governing the Prescription Monitoring Program*  
18 VAC 76-20

I have reviewed the proposed amendments to the *Regulations Governing the Prescription Monitoring Program*, 18 VAC 76-20, that were amended by the Director of the Virginia Department of Health Professions on July 17, 2014. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under §2.2-4006(A)(4)(a), as it is necessary to conform to changes in Virginia statutory law. The Director has the authority to adopt this regulation under Virginia Code § 54.1-2520. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.