



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

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

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

**DATE:** August 9, 2024

**SUBJECT:** Periodic Review of the *Regulations Governing Certification of Rehabilitation Providers*  
18VAC115-40

In accordance with Va. Code §§ 2.2-4007.1 and 2.2-4017, I have reviewed the *Regulations Governing the Certification of Rehabilitation Providers*, 18VAC115-40. These regulations are undergoing periodic review. In my opinion, the Board of Counseling had the authority under Va. Code § 54.1-2400 to adopt the current regulations, and the Board of Counseling has the authority to amend the regulations.