



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Jason S. Miyares
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

MEMORANDUM

TO: Arne Owens
Director
Virginia Department of Health Professions

FROM: James E. Rutkowski
Senior Assistant Attorney General

DATE: December 11, 2025

SUBJECT: Periodic Review of the *Delegation of Informal Fact-Finding to an Agency Subordinate*
18VAC115-15

In accordance with Code §§ 2.2-4007.1 and 2.2-4017, I have reviewed the *Delegation of Informal Fact-Finding to an Agency Subordinate*, 18VAC115-15. These regulations are undergoing periodic review. In my opinion, the Board of Counseling had the authority under Code § 54.1-2400 to adopt the current regulations, and the Board of Counseling has the authority to amend the regulations.