



COMMONWEALTH of VIRGINIA

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MEMORANDUM

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

FROM: Charis A. Mitchell
Assistant Attorney General

DATE: August 29, 2017

SUBJECT: *Regulations Governing the Practice of Optometry*
18 VAC 105-20-5 *et seq.*

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Optometry*, 18 VAC 105-20-5 *et seq.*, that were adopted by the Virginia Board of Optometry on July 21, 2017. These proposed amendments are emergency regulations promulgated pursuant to Virginia Code § 2.2-4011, following the declaration of an opioid addiction crisis public health emergency by the Virginia State Health Commissioner on November 21, 2016. The Board also has the authority to adopt these regulations under Virginia Code § 54.1-2400. The proposed regulations are constitutional and do not conflict with existing federal or state laws or regulations.