



# 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:** November 22, 2019

**SUBJECT:** *Regulations Governing the Practice of Optometry*  
18 VAC 105-20-47

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Optometry*, 18 VAC 105-20-47, that were adopted by the Virginia Board of Optometry on November 8, 2019. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch pursuant to Virginia Code §§ 2.2-4002(A)(14) and 54.1-3223. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400 and 54.1-3223. The proposed regulations are constitutional and do not conflict with existing federal or state laws or regulations.