



# 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 26, 2016

**SUBJECT:** *Regulations Governing the Practice of Pharmacy*  
18 VAC 110-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, which were adopted by the Board of Pharmacy on September 7, 2016. The Board has the authority to adopt these regulations under Virginia Code § 54.1-3435.3:1. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under Virginia Code § 2.2-4006(A)(4)(a). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.