



# COMMONWEALTH of VIRGINIA

*Office of the Attorney General*

**Mark R. Herring**  
Attorney General

202 North 9th Street  
Richmond, Virginia 23219  
804-786-2071  
FAX 804-786-1991  
Virginia Relay Services  
800-828-1120  
7-1-1

## MEMORANDUM

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

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

**DATE:** July 12, 2018

**SUBJECT:** *Regulations Governing the Practice of Pharmacy*  
18VAC110-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, that were adopted by the Board of Pharmacy on June 21, 2018. 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)(13) because the Board of Pharmacy is scheduling substances pursuant to Virginia Code § 54.1-3443(D) and (E). The Board has the authority to adopt these regulations under Virginia Code § 54.1-3443(D) and (E). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.