



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Arne Owens
Director
Virginia Department of Health Professions

FROM: James E. Rutkowski
Senior Assistant Attorney General

DATE: August 20, 2024

SUBJECT: *Regulations Governing the Practice of Pharmacy; Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians; Regulations for Practitioners of the Healing Arts to Sell Controlled Substances; Regulations Governing Wholesale Distributors, Manufacturers, Third-Party Logistics Providers, and Warehouse*
18VAC110-20; 18VAC110-21; 18VAC110-30; 18VAC110-50

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy, Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians, Regulations for Practitioners of the Healing Arts to Sell Controlled Substances, Regulations Governing Wholesale Distributors, Manufactures, Third-Party Logistics Providers, and Warehouse*, 18VAC110-20, 18VAC110-21, 18VAC110-30, 18VAC110-50, that were adopted by the Board of Pharmacy on June 25, 2024. The Board has the authority to adopt these regulations under Va. Code § 54.1-2400(6). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.