



COMMONWEALTH of VIRGINIA
Office of the Attorney General

Jason S. Miyares
Attorney General

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

MEMORANDUM

TO: Arne Owens
Director
Virginia Department of Health Professions

FROM: M. Brent Saunders
Senior Assistant Attorney General

DATE: September 12, 2025

SUBJECT: Regulations Governing the Practice of Behavior Analysts
18VAC85-150

I have reviewed the proposed amendments to the Regulations Governing the Practice of Behavior Analysts (18VAC85-150), as adopted by the Board of Medicine at its Executive Committee meeting on August 1, 2025. The Board has the authority to adopt these amendments as an exempt regulatory action pursuant to Chapters 561 and 553 of the 2025 Acts of Assembly. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.