



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Arne Owens
Director
Virginia Department of Health Professions

FROM: M. Brent Saunders
Senior Assistant Attorney General

DATE: August 20, 2025

SUBJECT: Regulations Governing the Practice of Optometry
18VAC105-20

I have reviewed the proposed amendments to the Regulations Governing the Practice of Optometry (18VAC105-20), as adopted by the Board of Optometry on May 23, 2025. The Board has the authority to adopt these amendments as an exempt regulatory action under Virginia Code § 2.2-4006(A)(4)(a), pursuant to the amendments made to Virginia Code §§ 54.1-3222, -3223, -3301 and -3303 during the 2025 General Assembly Session. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.