



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, 2025

SUBJECT: *Regulations Governing the Licensure of Pharmacists and the Registration of Pharmacy Technicians*
18VAC110-21

I have reviewed the proposed amendments to the *Regulations Governing the Licensure of Pharmacists and the Registration of Pharmacy Technicians*, 18VAC110-21, that were adopted by the Board of Pharmacy on May 19, 2025. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under Code § 2.2-4006(A)(4)(a) because the amendments are necessary to conform to changes in Virginia statutory law that are found in Ch. 168 of the 2025 Acts of the Assembly, and no agency discretion is involved. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.