



**COMMONWEALTH of VIRGINIA**  
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**MEMORANDUM**

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

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

**DATE:** April 28, 2026

**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, which were adopted by the Board of Pharmacy on March 17, 2026. The Board has the authority to adopt this regulation under Virginia Code § 54.1-2400. This regulatory change is expected to be noncontroversial and is appropriate for the fast-track rulemaking process. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.