



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Mark R. Herring
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120
7-1-1

MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: December 3, 2021

SUBJECT: *Regulations Governing the Practice of Pharmacy; Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*
18 VAC 110-20; 18 VAC 110-21

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18 VAC 110-20, and the *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18 VAC 110-21, which were adopted by the Board of Pharmacy on September 24, 2021. The Board has the authority to adopt these regulations under Virginia Code §§ 54.1-2400 and 54.1-3303.1. They are also emergency regulations pursuant to Virginia Code § 2.2-4011(B) because Virginia statutory law requires that these regulations be effective in 280 days or less from its enactment. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.