



COMMONWEALTH of VIRGINIA

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MEMORANDUM

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

FROM: Charis A. Mitchell
Assistant Attorney General

DATE: July 26, 2016

SUBJECT: *Regulations Governing the Practice of Optometry*
18 VAC 105-20-70

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Optometry*, 18 VAC 105-20-70, that were adopted by the Board of Optometry on July 15, 2016. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under Virginia Code § 2.2-4006(A)(4)(a), as it is necessary to conform to changes in Virginia statutory law. The Board has authority to adopt this regulation under Virginia Code § 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.