



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: March 30, 2024

SUBJECT: Periodic Review of the *Public Participation Guidelines*
18VAC115-11

In accordance with Va. Code §§ 2.2-4007.1 and 2.2-4017, I have reviewed the *Public Participation Guidelines*, 18VAC115-11. These regulations are undergoing periodic review. In my opinion, the Board of Counseling had the authority under Va. Code § 54.1-2400 to adopt the current regulations, and the Board of Counseling has the authority to amend the regulations.