



**COMMONWEALTH of VIRGINIA**  
*Office of the Attorney General*

**Jay Jones**  
Attorney General

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

**MEMORANDUM**

**TO:** David E. Brown, D.C.  
Director  
Virginia Department of Health Professions

**FROM:** M. Brent Saunders  
Senior Assistant Attorney General

**DATE:** April 30, 2026

**SUBJECT:** Regulations Governing the Practice of Licensed Acupuncturists  
18VAC85-110

I have reviewed the proposed amendments to the Regulations Governing the Practice of Licensed Acupuncturists (18VAC85-110), as adopted by the Board of Medicine on February 19, 2026. The Board has the authority to adopt these amendments as an exempt regulatory action pursuant to Va. Code § 54.1-2400 and Chapters 561 and 553 of the 2025 Acts of Assembly. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.