



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

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

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

**DATE:** April 12, 2017

**SUBJECT:** *Regulations Governing the Practice of Pharmacy*  
18 VAC 110-20

I have reviewed the proposed amendment to the *Regulations Governing the Practice of Pharmacy*, 18 VAC 110-20, that was adopted by the Board of Pharmacy on March 21, 2017. 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)(13) because the Board of Pharmacy, in consultation with the Virginia Department of Forensic Science, is scheduling substances in Schedule I pursuant to Virginia Code § 54.1-3443(D). The Board has the authority to adopt this regulation under Virginia Code § 54.1-3443(D). The proposed amendment is constitutional and does not conflict with existing federal or state laws or regulations.