



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Arne W. Owens
Director
Virginia Department of Health Professions

FROM: James E. Rutkowski
Senior Assistant Attorney General

DATE: March 21, 2025

SUBJECT: *Regulations for Delegation to an Agency Subordinate*
18VAC110-15

I have reviewed the amendments to the *Regulations for Delegation to an Agency Subordinate*, 18VAC110-15, as adopted by the Board of Pharmacy on September 24, 2024. The Board has the statutory authority to adopt the amendments under Va. Code § 54.1-2400 and Ch. 191 of the 2023 Acts of the Assembly. The regulations are appropriate for the fast-track rulemaking process pursuant to Va. Code § 2.2-4012.1 because they are expected to not be controversial. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.