



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: August 20, 2025

SUBJECT: *Regulations Governing the Practice of Pharmacy*
18VAC110-20

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18VAC110-20, that were adopted by the Board of Pharmacy on May 19, 2025. This action is exempt from the operation of the Administrative Process Act and review by the Executive Branch under Va. Code § 2.2-4006(A)(4)(a) because the Board of Pharmacy is deleting from the regulations drugs that have been scheduled pursuant to Ch. 118 of the 2025 Acts of the Assembly. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.