



**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 Collaborative Practice Agreements*  
18VAC110-40

I have reviewed the proposed amendments to the *Regulations Governing Collaborative Practice Agreements*, 18VAC110-40, 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 Code § 2.2-4006(A)(4)(a) because the amendments are necessary to conform to changes in Virginia statutory law that are found in Ch. 117 of the 2025 Acts of the Assembly, and no agency discretion is involved. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.