



COMMONWEALTH of VIRGINIA

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MEMORANDUM

TO: Karen Shelton, MD
State Health Commissioner
Virginia Department of Health

FROM: Allyson K. Tysinger
Senior Assistant Attorney General

DATE: September 10, 2025

SUBJECT: *Virginia Emergency Medical Services Regulations*
12 VAC 5-31

I have reviewed the amendments to 12 VAC 5-31 approved by the State Health Commissioner, acting for the State Board of Health when it was not in session under Virginia Code § 32.1-20, on August 26, 2025. The Commissioner has the statutory authority to adopt these amendments under 2025 Va. Acts ch. 459. The amendments are exempt from the requirements of the Administrative Process Act under Virginia Code § 2.2-4006(A)(4)(a) as necessary to conform to changes in Virginia statutory law where no agency discretion is involved. The proposed Regulations are constitutional and do not conflict with existing federal or state laws or regulations.