



COMMONWEALTH of VIRGINIA
Office of the Attorney General

202 North Ninth Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

Mark R. Herring
Attorney General

MEMORANDUM

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

FROM: James E. Rutkowski
Assistant Attorney General

DATE: October 3, 2019

SUBJECT: *Regulations Governing the Practice of Professional Counseling; Regulations Governing the Practice of Marriage and Family Therapy; Regulations Governing the Practice of Licensed Substance Abuse Treatment Practitioners*
18VAC115-20; 18VAC115-50; 18VAC115-60

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Professional Counseling*, 18VAC115-20, the *Regulations Governing the Practice of Marriage and Family Therapy*, 18VAC115-50, and the *Regulations Governing the Practice of Licensed Substance Abuse Treatment Practitioners*, 18VAC115-60, as adopted by the Board of Counseling on August 16, 2019. The proposed amendments are emergency regulations promulgated pursuant to Virginia Code § 2.2-4011. The Board of Counseling has the statutory authority to promulgate these regulations under Virginia Code § 54.1-3505. The proposed regulations are constitutional and do not conflict with existing federal or state laws or regulations.