



COMMONWEALTH of VIRGINIA
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MEMORANDUM

TO: Arne Owens
Director
Virginia Department of Health Professions

FROM: M. Brent Saunders
Senior Assistant Attorney General

DATE: September 10, 2025

SUBJECT: Regulations Governing the Practice of Occupational Therapy
18VAC85-80

I have reviewed the proposed amendments to the Regulations Governing the Practice of Occupational Therapy (18VAC85-80), as adopted by the Board of Medicine on June 26, 2025. The Board has the authority to adopt these amendments pursuant to Virginia Code § 54.1-2400. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.