



COMMONWEALTH of VIRGINIA

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MEMORANDUM

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

FROM: James E. Rutkowski
Senior Assistant Attorney General

DATE: July 19, 2026

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 June 16, 2026. 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)(13) because the Board of Pharmacy is scheduling substances pursuant to Virginia Code § 54.1-3443(D). The Board has the authority to adopt these regulations under Va. Code § 54.1-3443(D). The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.