



COMMONWEALTH of VIRGINIA

Office of the Attorney General

Jay Jones
Attorney General

202 North 9th Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

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)(4)(a) because the Board of Pharmacy is deleting from the regulations drugs that have been scheduled pursuant to Ch. 171 of the 2026 Acts of the Assembly. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.