



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

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

**FROM:** James E. Rutkowski  
Assistant Attorney General

**DATE:** May 4, 2021

**SUBJECT:** *Regulations Governing the Practice of Pharmacy; Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*  
18 VAC 110-20; 18 VAC 110-21

I have reviewed the proposed amendments to the *Regulations Governing the Practice of Pharmacy*, 18 VAC 110-20, and the *Regulations Governing the Licensure of Pharmacists and Registration of Pharmacy Technicians*, 18 VAC 110-21, which were adopted by the Board of Pharmacy on March 30, 2021. The Board has the authority to adopt the regulations under 2020 Va. Acts. Ch. 102 and Virginia Code §§ 54.1-2400, 54.1-3300, and 54.1-3321. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.