



**COMMONWEALTH of VIRGINIA**  
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**MEMORANDUM**

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

**FROM:** Sara A. Blöse  
Senior Assistant Attorney General

**DATE:** February 24, 2026

**SUBJECT:** Periodic Review of the *Regulations for Prescriptive Authority for Advanced Practice Registered Nurses*  
18VAC90-40

In accordance with Va. Code §§ 2.2-4007.1 and 2.2-4017, I have reviewed the *Regulations for Prescriptive Authority for Advanced Practice Registered Nurses*, 18VAC90-40.

These regulations are undergoing periodic review. In my opinion, the Board of Nursing had the authority under Va. Code § 54.1-2400 to adopt the current regulations, and the Board of Nursing has the authority to amend the regulations.