



Texas Association of Health Plans
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January 19, 2026

RE: Comments on Proposed Rules 22 TAC §291.33 and 22 TAC §291.104

Texas State Board of Pharmacy,

As the statewide trade association representing health insurers, HMOs, Medicaid managed care, and other health plans that serve over 20 million Texans, the Texas Association of Health Plans (TAHP) is committed to ensuring that Texas families and employers have access to affordable, comprehensive, and high-quality coverage. We are writing in support of the proposed amendments to 22 TAC §291.33 and 22 TAC §291.104, which would allow the electronic transmission of written patient counseling information as the default method, unless a patient specifically requests a printed copy.

Allowing electronic delivery by default represents a practical and timely step forward. It enhances flexibility in how pharmacies communicate essential information and better accommodates patients' preferences in an increasingly digital world. Many individuals already rely on electronic platforms for health records and medication information, and aligning pharmacy operations with these evolving expectations improves the overall patient experience.

This change also supports broader policy goals of sustainability and operational efficiency. Reducing reliance on paper materials decreases printing costs and waste, while streamlining pharmacy workflows. It enables staff to focus on direct patient care, without compromising the availability of printed materials for those who prefer them.

Thank you for considering these comments and for advancing a rule that modernizes pharmacy practice while preserving patient choice.

A handwritten signature in black ink that reads "Jamie Dudensing". The signature is written in a cursive, flowing style.

Jamie Dudensing, RN
CEO, Texas Association of Health Plans