

Bill 28: status update on pharmaceutical services as at December 1, 2015

This communication applies to all plan sponsors with plan members in the Province of Québec and who comply with RAMQ regulations

*****At time of publication*****

We are pleased to update you on the status of pharmaceutical services under Bill 28 (*An Act mainly to implement certain provisions of the Budget Speech of 4 June 2014 and return to a balanced budget in 2015-2016*).

As [communicated](#) previously, pharmacists in Québec have been able to offer additional services since June 20, 2015. We have been waiting for the Québec Government to confirm by legislation the fees that pharmacists could charge for these services to members of private plans.

This awaited legislation is expected to come into force very soon and should confirm that the fees charged to the private sector cannot exceed the fees charged to the RAMQ. TELUS Health, our service provider, in conjunction with carrier requests not to delay payment any longer, has decided to implement this change as of December 1, 2015, in advance of the awaited legislation officially coming into force.

What is Sun Life doing?

Sun Life's position (in accordance with the insurance industry direction) is as follows:

- When a pharmacist charges for these services, they will be treated like any other RAMQ drug i.e., reimbursement will be calculated either according to the plan's coinsurance (unless the plan pays only the minimum RAMQ) or at a *minimum* of 66% until the RAMQ out-of-pocket (OOP) is reached. Once the annual OOP limit is reached, we will reimburse these services at 100%. Please note that, under the law, pharmacists are not allowed to charge above the prices set out by RAMQ.
- Any plan members who received pharmaceutical services after June 20, 2015, and who have not already submitted a claim, can feel free to submit their original receipt for consideration. These claims will be reprocessed (without having to be resubmitted) once our systems are ready in the coming weeks. Claims submissions for these services have been allowed directly at the pharmacy since December 1, 2015.
- The insurance industry represented by the Canadian Life and Health Insurance Association (CLHIA) has agreed that payments of claims should be paid retroactively to June 20, 2015.

Questions?

Contact your Sun Life Financial group benefits representative.

More information for plan sponsors

We have prepared a set of FAQs to answer some questions you may have about these new details as a plan sponsor.

Plan sponsor FAQs

1. Which services are billable?

Billable services and the associated fees are listed on the opq.org website. A summary of these services is as follows:

- Evaluation of the need for the prescription of a medication for one of the [12 minor conditions](#).
- Evaluation of the need for the prescription of a medication when no diagnosis is required for one of the [specified conditions](#).
- Taking charge of the adjustment of a dose of a medication to attain a therapeutic target.
- Extending a physician's prescription for a period over 30 days.

2. Which services are not billable?

Non-billable services are listed on the opq.org website. A summary of these services is as follows:

- Replacement of a prescribed medication, where it is out of stock in Québec, with another medication.
- Administration of a medication in order to establish its appropriate usage.
- Prescription and interpretation of laboratory analyses for the purpose of monitoring a drug therapy.
- Adjustment of a physician's prescription, by modifying the dosage form, dose, quantity or dosage regimen of a prescribed medication to ensure patient safety.
- Extending a physician's prescription for a period of 30 days or less.

3. How much is Sun Life reimbursing?

Sun Life will be calculating the reimbursement amount of the billable services according to the plan's coinsurance, unless the plan pays only the minimum RAMQ. Once the RAMQ annual out-of-pocket limit is reached, we will reimburse these services at 100%.

RAMQ has set a maximum on some of these services which we will be looking to mimic. As an example: Sun Life will reimburse a maximum of \$12.50 per calendar year per person for 'Extending a physician's prescription for a period over 30 days'.

4. **If the pharmacist charges more than the RAMQ price, are there controls in place to protect the plan?**

Pricing for pharmaceutical services billed to the private sector cannot exceed the one confirmed for the public plan.

5. **Will there be an increase in plan rates to accommodate the new processes surrounding this Bill?**

At this time, there will be no increase to your rates. New pharmaceutical services will be flowing through the drug claim experience. Once the services start being reimbursed, Sun Life will monitor members' utilisation and your Sun Life representative will be in a better position to help you estimate the impact.

More information for plan members

We have prepared the following FAQs to help you answer any questions your plan members may have about these new details.

Plan member FAQs

1. **If the pharmacist charges me, will it be covered under my private plan?**

If your pharmacist charges you for one of the accepted billable services, in accordance with the new law, your private plan will cover you. Keep in mind that there is a maximum amount that your pharmacist is legally allowed to charge for these services.

2. **How much will Sun Life reimburse me?**

Sun Life will be calculating the reimbursement according to your plan's coinsurance, unless your plan pays only the minimum RAMQ. Once the RAMQ annual out-of-pocket limit is reached, we will reimburse your claim for these services at 100% of the eligible amount.

3. **What will happen if the pharmacist charges me more than the amounts that are set out by RAMQ?**

Pricing for pharmaceutical services billed to the private sector cannot exceed the one confirmed for the public plan.

4. **What will happen in respect of claims that I have already submitted for services rendered by my pharmacist? Do I need to re-submit?**

No, you do not need to re-submit your claim. Once our systems are ready in the coming weeks, Sun Life will re-assess your claim and advise you accordingly.

5. **What if I received one of these services from my pharmacist, but haven't yet submitted a claim? Can I or my pharmacist submit the claim now?**

If you received and paid for one of these services from your pharmacist that are billable and so eligible for reimbursement, you can submit a claim form and your original receipt to Sun Life for consideration.

6. Are there any circumstances in which I will not be reimbursed?

Yes, if you have reached the maximum set by RAMQ and/or if you are 65 years of age or over and your claim has already been paid by RAMQ, you may not receive further coverage under your Sun Life plan.