



Canadian Life & Health
Insurance Association
Association canadienne des
compagnies d'assurances
de personnes

Submission to the
**ONTARIO HEALTH WORKFORCE
REGULATORY OVERSIGHT BRANCH –
CHANGES TO ADVANCE THE PHARMACY
SECTOR**

October 20, 2024





INTRODUCTION

The CLHIA is the national trade association for life and health insurers in Canada. Our members account for 99 per cent of Canada’s life and health insurance business. The industry provides a wide range of financial security products such as life insurance, annuities, and supplementary health insurance. Canadian life insurers operate in more than 20 countries and three of our members rank among the top 15 largest life insurers in the world by market capitalization.



Protecting 11.1 million Ontarians

10.4 million
with drug, dental and other health benefits

8.5 million
with life insurance averaging \$273,000 per insured

5 million
with disability income protection



\$56.7 billion in payments to Ontarians

\$19.7 billion
in health and disability claims

\$7.5 billion
in life insurance claims paid

\$29.5 billion
in annuities

INTRODUCTION

Life and health insurers play a key role in providing benefit plans to Ontarians, typically through the employer. In 2023, the industry paid out \$6.8B in prescription drug benefits while providing coverage to 10.4 million Ontarians. Our industry plays a significant role in providing drug benefits are paid timely and appropriately, thereby assuring plan sustainability for employers and employees. It is with this context in mind that we appreciate the opportunity to provide some comments regarding the proposed changes to advance the pharmacy sector in Ontario.

BACKGROUND

As background to this submission, CLHIA is providing feedback to the proposed regulatory enhancements to clarify our role in the provision of private drug benefits and the potential effect such regulatory changes could have on private drug plans.

INDUSTRY COMMENTS

Scope of Practice Expansion

Private insurers are in favour of pharmacists, like other health professionals, being able to play an increased role in the health system. Such a scope of practice expansion could notably help to ease the burden on physicians and other healthcare professionals. Our industry is taking other steps to relieve burden, such as having standard short and long term disability forms, reducing the requirement for physician referrals to other healthcare providers, and reducing requirements for information during drug prior approvals.



Ensuring Information is Available for Claim and Prior Approval Processing

At times, drug and medical items reviewed and paid by plans, both public and private, require additional information before approval or a benefit is processed. As an example, in order to process a new claim for Ozempic, it is possible that a recent A1C test is required. Expansion of scope for pharmacists should ensure that this type of information is available to other stakeholders in the system, to ensure continuity of care.

Costs of Expanded Scope Services

We believe, however, that it is important to exercise caution with regard to the remuneration for services within an expanded scope that may not be reimbursed through the public system. Examples of new scope activities that may have an impact on private plans include a) laboratory or point-of-care tests, b) the administration of vaccines such as travel vaccines, and others. It is important, though, that there not be an obligation on employers to provide coverage for these newly expanded services through private benefit plans.

While many of the expanded scope services that may be reimbursed by private insurers cannot be billed through the current pharmacy claims standard, it is important to note that there may be reimbursement through traditional 'pay and submit' methods, such as healthcare spending accounts.

Although insurers are in favour of expanding pharmacists' scope, we consider it essential that this expansion does not exert additional financial pressure on the group insurance benefit plans of employers, unions and workers.

CONCLUSION

Thank you for considering our comments on this important initiative. We appreciate the opportunity to share our input as you consider expanded scopes of practice. Please do not hesitate to reach out to jweir@clhia.ca with any questions or feedback you may have.



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