ORCHARD
BENEFITS

QUEBEC EMPLOYER GUIDE · 2027

What Bills 68 & 99 Mean for Group Benefits Plans

A practical guide from Orchard Benefits on how Quebec's new legislation may affect your employee benefits plan.

Fewer physician referrals
Not required just to get reimbursed

Simpler paramedical claims
Physio, massage, psychology and more

Disability follow-up
Set by the treating physician

Premium tax rises to 9.975%
Up from 9.0% under Bill 99

Contracts updated by Dec. 1, 2027
Handled through your carrier

EFFECTIVE
January 1, 2027

PART 1

Bill 68

Less paperwork for physicians, simpler claims for members.

IN FORCE JANUARY 1, 2027

BILL 68 · THE BASICS

What Is Bill 68?

An Act mainly to reduce the administrative burden of physicians.

01

What is Bill 68?

A Quebec law enacted in October 2024 to cut physician paperwork, so doctors can spend more time on patient care.

02

When does it take effect?

The regulation was published September 2, 2026 and comes into force January 1, 2027.

03

Why was it introduced?

To reduce unnecessary administrative work for physicians and improve access to frontline health care.

04

Who does it apply to?

All Quebec residents with private health insurance, on both insured and ASO plans.

05

Does it affect national employers?

Yes. Any employer with Quebec-resident employees is affected, wherever it is headquartered.

06

Does it change benefit coverage?

No. Covered services, maximums, frequency limits and claims controls stay the same. The paperwork is what changes.

BILL 68 · WHAT IS CHANGING

Less Paperwork for Physicians

Two changes for your plan, starting January 1, 2027.

WHAT CHANGES

No referral needed to get reimbursed

For many paramedical services and medical aids.

Disability follow-up set by the doctor

Insurers can't require more visits than the physician advises.

WHAT THIS MEANS

01 **Simpler claims for members**

02 **Updated insurer booklets and communications**

03 **Adjusted disability management**

BILL 68 · SCOPE

Who Does It Apply To?

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It follows the employee, not the head office. Residence in Quebec is what counts.

Plan members

Quebec residents with private health insurance.

National employers

Covered wherever you're headquartered, if you have Quebec-resident employees.

Insured and ASO plans

Applies to both insurers and benefits plan administrators.

Who must comply

Insurers, administrators, plan sponsors, and anyone who adjudicates claims or sets claim requirements.

Teams in more than one province

Rules apply only to members living in Quebec, so plan how you communicate across your workforce.

THE TAKEAWAY

If any of your employees live in Quebec, **Bill 68 applies to your plan.**

BILL 68 · SERVICES AND EXCEPTIONS

Affected Services and Permitted Exceptions

Most care no longer needs a doctor's note. A short list still does.

NO DOCTOR'S NOTE

Most care

- Physiotherapy
- Massage therapy
- Psychology
- Occupational therapy
- Chiropractic
- Other professional services
- Certain medical and technical aids

Members can claim these without a physician's referral, subject to plan rules.

DOCTOR STILL NEEDED

Exceptions

- Prescription drugs
- Home nursing
- Hyperbaric oxygen
- Government programs
- Certain tax forms
- Medical equipment*

*Wheelchairs, TENS, compression, breast pumps, hospital beds and lifts, or any aid costing $1,000+ to buy or $150+ a month to rent.

BILL 68 · PLAN IMPACT

What Stays the Same

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Fewer forms does not mean fewer controls. Your plan design and claims safeguards remain in place.

Covered services
Your plan design still decides what's covered and what's eligible.

Maximums and limits
Plan maximums, frequency limits and reimbursement levels remain in place.

Claims controls
Adjudication, eligibility checks, fraud prevention and clinical review continue.

Eligible practitioners
Members still see eligible practitioners and submit claims under plan rules.

Disability management
Functional interviews, medical reviews, rehabilitation and independent medical exams continue.

THE TAKEAWAY

Early actuarial analysis points to **minimal to no material impact on plan costs.**

PART 2

Bill 99

A higher tax on insurance premiums, from 9.0% to 9.975%.

IN FORCE JANUARY 1, 2027

BILL 99 · THE BASICS

What Is Bill 99?

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A Quebec tax bill that raises the tax on insurance premiums.

01

What is Bill 99?

A Quebec bill adopted in 2025 that includes several tax measures, including a higher tax on insurance premiums.

02

When does it take effect?

January 1, 2027.

03

What is changing?

The tax on insurance premiums rises from 9.0% to 9.975%, in line with the Quebec Sales Tax (QST) rate.

04

Does it apply to group benefits?

Yes. It applies to taxable insurance products, including group benefit plans.

05

How is the new rate applied?

By payment date. Payments received by Dec. 31, 2026 are taxed at 9.0%. Payments received from Jan. 1, 2027 are taxed at 9.975%.

06

Will it affect plan costs?

It may. The increase is small, but costs can rise even if your premium stays the same.

BILL 99 · PREMIUM TAX

A Higher Tax on Insurance Premiums

Quebec's tax on insurance premiums now matches the QST rate.

WAS

~~9.0%~~ → NOW **9.975%**

Plan costs can rise, even if your premium doesn't.

Starts January 1, 2027

Based on payment date. Payments received by Dec. 31, 2026 stay at 9.0%.

Applies to group benefit plans

And other taxable insurance products.

Expect slightly higher costs

Plus billing updates and more focus at renewal.

YOUR NEXT STEPS

What Employers Should Do Now

No immediate action is required. Carriers will update contracts and booklets through their standard amendment process. A little preparation still helps your team and your budget.

01

Identify your Quebec-resident employees

Bill 68 follows where members live, not where you are headquartered.

02

Review absence and medical note policies

Labour standards now limit medical notes for some short absences.

03

Plan how you'll tell members

Claims get simpler, but some services still need a doctor.

04

Budget for the new premium tax

9.975% applies to payments received from Jan. 1, 2027.

OCT. 2024
Bill 68 passed

SEPT. 2, 2026
Regulation published

JAN. 1, 2027
Bill 68 and Bill 99 in force

DEC. 1, 2027
Contract updates complete

ORCHARD'S PERSPECTIVE

Simpler Claims, Smarter Budgets

Your coverage isn't changing, but how members claim and what your plan costs will. A quick review keeps your team informed and your renewal on track.

Let's connect before your renewal.

We'll walk through what changes for your Quebec members and your costs.

Book a Benefits Review →

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