



Nurse Practitioners  
Association of Canada

Association des  
infirmières et  
infirmiers praticiens  
du Canada

**NPAC-AIIPC**  
1205-1033 Marinaside Crescent  
Vancouver, BC  
V6Z 3A3

December 17, 2025

**Via email and mail**

**Mr. David Harney**

President & Chief Executive Officer  
The Canada Life Assurance Company  
100 Osborne Street North  
Winnipeg, MB R3C 1V3

**The Honourable Adriana LaGrange**

Minister of Primary and Preventative Health Services  
Government of Alberta  
Edmonton, AB (via email: [health.minister@gov.ab.ca](mailto:health.minister@gov.ab.ca))

**The Honourable Marjorie Michel**

Minister of Health  
Government of Canada (via email: [hcminister.ministresc@hc-sc.gc.ca](mailto:hcminister.ministresc@hc-sc.gc.ca); [marjorie.michel@parl.gc.ca](mailto:marjorie.michel@parl.gc.ca))

Re: Canada Life LTD requirements — recognition of Nurse Practitioners as primary care providers and appropriate certifiers for LTD claims

Dear Mr. Harney and Honourable Ministers,

I am writing on behalf of the Nurse Practitioner Association of Canada regarding a Long-Term Disability (LTD) communication being issued to plan members that states, in part, that to continue receiving LTD benefits, a claimant must “be under the care of a legally licensed Doctor of Medicine, including a certified specialist if requested.”

This requirement is out of step with Canada’s current health-care delivery reality and creates an avoidable access barrier for claimants particularly in jurisdictions such as Alberta where Nurse Practitioners (NPs) are regulated health professionals with legislated authority to serve as a patient’s primary care provider and to diagnose, treat, prescribe, order/interpret investigations, and coordinate ongoing care within their scope of practice.



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Importantly, the federal government's January 10, 2025 clarification regarding the Canada Health Act (the "Canada Health Act Interpretation Letter" / CHA Services Policy) explicitly recognizes that medically necessary services are increasingly delivered by regulated professionals other than physicians, including nurse practitioners, and that patients benefit from NPs diagnosing, referring, and treating patients. This federal clarification reflects the modern standard of care delivery in Canada and should inform insurer policies that affect timely access to benefits and recovery supports.

### **Why this matters for claimants and recovery**

Requiring a claimant to be under the care of a physician when their most responsible provider is an NP can:

- delay treatment continuity and claims adjudication,
- force duplicative appointments solely to obtain a signature or "physician confirmation,"
- increase cost and burden to the system and to claimants,
- disadvantage rural/remote and underserved communities where NPs may be the most accessible primary care provider.

### **Requested actions**

#### **1) Canada Life (immediate policy and communications update)**

We respectfully request that Canada Life:

- revise LTD claimant communications and internal adjudication standards to recognize Nurse Practitioners as primary care providers and as appropriate regulated professionals to complete disability-related medical reports within their scope; and
- replace restrictive language such as "must be under the care of a legally licensed Doctor of Medicine" with language aligned to Canadian practice realities, for example:  
*"must be under the care of an appropriately licensed regulated health professional authorized to diagnose and manage the claimant's condition (e.g., nurse practitioner, physician, or relevant specialist when required)."*
- provide clear guidance to case managers that NP-completed medical documentation is acceptable for LTD continuation and return-to-work planning, unless a specialist opinion is specifically and clinically justified.



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## 2) Government of Alberta (system alignment and insurer expectations)

We request that Alberta reinforce, through policy direction and stakeholder engagement, that regulated insurers operating in Alberta should not impose administrative requirements that contradict the province's authorized NP scope of practice or create barriers for claimants whose primary care provider is an NP.

## 3) Government of Canada (national consistency)

We request that Health Canada and the federal Minister of Health support national consistency by encouraging insurers and third-party administrators to align disability-benefits requirements with the January 2025 federal clarification recognizing the role of NPs in delivering medically necessary care. Nurse Practitioners are integral to timely, accessible care in Canada. LTD policies that effectively require physician-only services where it is not clinically required undermine recovery and create inequitable access to benefits.

The Nurse Practitioner Association of Canada would welcome the opportunity to meet with Canada Life and relevant government officials to support rapid, practical implementation (updated templates, staff training, and standard wording).

Thank you for your attention to this matter. I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stan Marchuk'.

Dr. Stan Marchuk, DNP, MN, NP(F), FAANP  
Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Laura Housden'.

Dr. Laura Housden, PhD, MN, NP(F)  
President

**CC:** Nurse Practitioner Association of Alberta (NPAA)  
Health Canada Federal Chief Nurse  
Canadian Life & Health Insurance Association