



Nurse Practitioners  
Association of Canada

Association des  
infirmières et  
infirmiers praticiens  
du Canada

NPAC-AIIPC  
1205-1033 Marinaside Crescent  
Vancouver, BC  
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June 10, 2026

The Honourable Marjorie Michel  
Minister of Health  
Health Canada  
Ottawa, ON

Dr. Leigh Chapman  
Chief Nursing Officer for Canada  
Health Canada  
Ottawa, ON

Dear Minister Michel and Dr. Chapman,

**Re: Federal Health Canada Occupational Health Evaluation Forms Requiring Physician Co-Signature for Nurse Practitioner Documentation**

On behalf of the Nurse Practitioner Association of Canada, I am writing to bring forward a practice barrier recently identified by Nurse Practitioners in British Columbia. This barrier concerns a Health Canada Occupational Health Evaluation Form in which a patient was reportedly advised that a physician was required to “co-sign” a letter completed by a Nurse Practitioner attesting to the patient’s health status.

This requirement is concerning and appears inconsistent with the authorized scope of practice of Nurse Practitioners in British Columbia and across Canada. Nurse Practitioners are autonomous, regulated health professionals with the authority to assess, diagnose, treat, prescribe, order and interpret diagnostic tests, and provide clinical documentation within their scope of practice. Requiring a physician co-signature for documentation completed by a Nurse Practitioner creates an unnecessary administrative barrier, delays patient access to services, and undermines the role of Nurse Practitioners as independent providers of care.



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This issue is particularly concerning when it arises within a federal process. Health Canada and federally administered programs should model interprofessional respect, scope-of-practice alignment, and efficient access to care. Requirements that default to physician-only attestation, or require physician validation of Nurse Practitioner clinical documentation, reinforce outdated hierarchies and create avoidable barriers for patients, employers, and providers.

We respectfully request that Health Canada review the Occupational Health Evaluation Form and any associated policies, instructions, adjudication processes, or third-party administrative practices to ensure that documentation completed by a licensed Nurse Practitioner is accepted without requiring physician co-signature when the information requested falls within the Nurse Practitioner's regulated scope of practice.

Specifically, we ask Health Canada to:

1. Confirm whether a physician co-signature is formally required for the Health Canada Occupational Health Evaluation Form when completed by a Nurse Practitioner;
2. Clarify that Nurse Practitioner-completed documentation is acceptable when the assessment and attestation fall within the Nurse Practitioner's scope of practice;
3. Update any forms, instructions, internal guidance, or contractor/adjudicator processes that imply only physicians may complete or validate these forms;
4. Communicate this clarification to relevant Health Canada staff, occupational health teams, third-party administrators, and patients to prevent further delays and confusion; and



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5. Work with NPAC to identify and resolve any broader federal forms or benefit processes that continue to require physician signatures where Nurse Practitioner documentation should be accepted.

At a time when Canada is working to improve access to care, reduce administrative burden, and better utilize the health workforce, it is essential that federal programs fully recognize Nurse Practitioners' legislated authority. Patients should not be required to seek duplicative appointments with physicians solely to validate documentation already completed by a qualified, regulated Nurse Practitioner.

NPAC would welcome the opportunity to discuss this issue further and to support Health Canada in reviewing federal forms and processes to ensure they are inclusive of Nurse Practitioners' scope of practice across jurisdictions.

Thank you for your attention to this matter. We look forward to your response and to continued collaboration in removing barriers that affect patients and Nurse Practitioners across Canada.

Sincerely,

**Dr. Stan Marchuk, DNP, MN, NP(F), FAANP**

Chief Executive Officer

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