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NDs and Access to Lab Services

Background

In British Columbia, access to laboratory services for naturopathic doctors (NDs) is a complex issue, shaped by two distinct pathways. While NDs are not part of the Laboratory Services Agreement (LSA), which governs laboratory access for other healthcare providers, they still have the ability to order laboratory tests through LifeLabs. This arrangement, facilitated largely by LifeLabs, provides NDs with critical access to diagnostic services, particularly for patients requiring routine testing to monitor ongoing care and medication management. However, the absence of NDs in the LSA means they are not fully integrated into the same framework as other healthcare professionals, creating a nuanced situation where access to lab services is supported by private partnerships rather than the provincial healthcare system's formal agreements. This dual structure adds complexity to the broader conversation about equitable and comprehensive access to lab testing for NDs in BC.

NDs and LifeLabs

Naturopathic doctors (NDs) in British Columbia rely on diagnostic lab services to support comprehensive patient care. LifeLabs, a key provider, plays an important role in meeting diagnostic needs. However, NDs face challenges due to exclusion in BC's Lab Services Act, limiting access to publicly funded tests, and ongoing billing discrepancies impacting clinical and operational efficiency. Additionally, many areas in the province, including the Sea-to-Sky corridor, remain underserved by LifeLabs, with patients often facing long travel times and wait periods to access routine testing. The Sea-to-Sky corridor, which includes Squamish, Whistler, Pemberton, and the surrounding areas, is experiencing rapid population growth, making the need for a new LifeLabs location in Squamish even more urgent. Currently, patients in this region often must travel as far as West Vancouver for lab services, creating significant barriers, particularly during the winter months when road conditions can be unpredictable. West Kelowna is another growing area which faces a similar crisis of access.

NDs and the Lab Services Act

The [Laboratory Services Act \(LSA\) of British Columbia](#), effective since October 1, 2015, governs the provision of publicly funded laboratory services in the province. It consolidates responsibilities for governance, funding, and service delivery oversight of all publicly funded laboratory services, replacing previous authorities under the Medicare Protection Act and the Hospital Insurance Act. Under the LSA, a "referring practitioner" is defined as a medical practitioner enrolled under the Medicare Protection Act or a person within a class of prescribed health care practitioners. As of August 30, 2024, pharmacists have been recognized as referring practitioners, allowing them to order certain laboratory tests for medication management. The inclusion of other health care practitioners, such as dentists, midwives, podiatrists, and nurse practitioners, as referring practitioners is outlined in the Laboratory Services Regulation. However, naturopathic doctors (NDs) are not currently listed among the prescribed health care practitioners authorized to request laboratory services under the LSA. This exclusion limits NDs' ability to access publicly funded laboratory services for their patients, often resulting in out-of-pocket expenses for necessary diagnostic tests. Advocacy efforts are ongoing to amend the LSA to include NDs as referring practitioners, thereby enhancing patient care by providing more comprehensive and accessible diagnostic services.

Current Context

LifeLabs

In the 2024 BCND member survey, respondents indicated that their average monthly billing with LifeLabs ranged between \$5,000 and \$10,000. The most cited barrier to accessing lab services was geographic limitations, with many

NDs reporting challenges related to the availability and proximity of local lab facilities. BCND has also engaged with our membership and understood the following challenges also arise frequently in interactions with LifeLabs:

- **Overbilling Issues:** NDs report frequent errors in billing reconciliation, delayed billing, and overcharges due to manual entry mistakes and documentation fees.
- **Service Limitations:** NDs' inability to access specific medically necessary tests through public funding forces patients to pay out-of-pocket, creating financial barriers.
- **Operational Changes at LifeLabs:** Following its acquisition of Rocky Mountain Analytical, LifeLabs introduced stricter billing processes and fees, exacerbating member concerns about service reliability and affordability.
- **Policy Confusion:** A challenge has emerged regarding LifeLabs' policies, which stipulate that once bloodwork is completed at a LifeLabs Service Centre, any subsequent concerns—such as those related to patient-doctor communications or billing—become the responsibility of the ordering practitioner. This policy has created confusion and potential issues for naturopathic doctors (NDs) in managing patient expectations and ensuring smooth communication.

LSA

BCND continues to maintain a strong relationship with the Laboratory Services Division (LSD) and is actively engaged in ongoing discussions regarding the integration of NDs into the Laboratory Services Act (LSA). While we do not have definitive timelines on when or if changes will be made, the Ministry of Health is keen to continue conversations with BCND, recognizing the essential role NDs play in improving access to care. For example, as the Cervical Screening Program transitions from cytology to HPV testing as the primary screening method for cervical cancer, BCND is committed to ensuring that NDs are well-informed and prepared to support this transition effectively.

Furthermore, BCND will continue to advocate on behalf of the profession and provide members with updates as new developments arise. A meeting with the Ministry and other stakeholders is expected early in 2025, and we will keep members informed of any changes or actions that may impact your practice.

Important to note that BCND has confirmed that, for the time being, the Cervical Screening Laboratory is accepting Pap test samples ordered by naturopathic doctors (NDs). If a Pap test ordered by an ND indicates the need for a colposcopy, the Cervical Screening Program will facilitate a referral to the appropriate colposcopy clinic. For further clarification on accepted samples, members can contact the BC Cancer Cervical Screening Program directly via their online inquiry form.

Challenges

Exclusion from the Laboratory Services Act (LSA):

- **Implication:** NDs' exclusion from the LSA limits their access to publicly funded lab services, forcing patients to pay out-of-pocket for essential tests. This financial burden on patients compromises the affordability and accessibility of care, especially for those requiring regular diagnostic testing to manage chronic conditions or medication regimens.
- **Patient-Centered Care at Risk:** The inability to access funded lab services undermines NDs' ability to provide timely, cost-effective care, risking delayed diagnoses and hindered treatment progress.

Billing Discrepancies with LifeLabs:

- **Implication:** Frequent billing errors and overcharges create administrative inefficiencies for NDs and increase the burden on their practices. These discrepancies not only impact NDs financially but also frustrate patients, who may struggle with unexpected charges or delays in lab results.
- **Patient-Centered Care at Risk:** These billing challenges detract from the time NDs can spend on direct patient care, compromising the overall quality of healthcare delivery and the patient experience. Additionally, these issues may lead to financial barriers that prevent patients from accessing necessary testing, further reducing the availability of affordable care.

Geographic Limitations:

- **Implication:** Geographic limitations in underserved regions like the Sea-to-Sky corridor result in patients having to travel long distances for lab services, delaying testing and treatment. This problem is particularly pronounced in rural and remote areas, where access to healthcare providers and diagnostic facilities is already limited.
- **Patient-Centered Care at Risk:** Extended travel times and wait periods not only delay diagnoses but also strain patients' ability to engage in continuous care, making it more difficult to provide effective and timely interventions.

Policy Confusion and Responsibility:

- **Implication:** LifeLabs' current policies place full responsibility for all patient communication on the ordering ND both before and after laboratory testing. While NDs recognize their role in guiding patients through the lab process, LifeLabs' approach effectively absolves itself of accountability, even in cases where the lab has made an error. When LifeLabs fails to complete all tests ordered on a requisition, an error on their part, the only solution offered is for the patient to return for a second blood draw. This process disregards both patient and practitioner time and creates unnecessary administrative and clinical burdens.
- **Financial and Reputational Impact on NDs:** NDs, despite fulfilling their responsibilities in ordering and managing lab requisitions appropriately, are often left to bear the consequences of LifeLabs' errors. This includes managing patient concerns, addressing requests for refunds for incomplete or delayed testing, and absorbing the resulting financial costs. These situations place an unfair burden on NDs and can negatively impact their professional reputation, as they are held accountable for service failures beyond their control, often without sufficient support from LifeLabs.
- **Collaborative Solutions Needed:** To improve outcomes, NDs need clearer guidelines and better collaboration with LifeLabs to streamline communication and resolve issues more efficiently, ensuring that patients' concerns are handled promptly and accurately.

Punitive and Limiting Policies at LifeLabs:

- **Implication:** LifeLabs' current policies regarding lab requisitions and error resolution are not only restrictive but also punitive toward NDs. When LifeLabs makes an error, such as failing to run all tests ordered on a requisition, the only solution offered is for patients to return for an additional blood draw. This creates inefficiencies in care and places an undue burden on both the patient and the practitioner.
- **Patient-Centered Care at Risk:** These policies compromise patient-centred care by causing delays, additional appointments, and repeated testing. This increases frustration for patients and can lead to delayed diagnoses and treatment. The added inconvenience may also undermine trust in the ND-patient relationship and create perceptions of practitioner insufficiency, despite the ND having fulfilled their professional responsibilities.

Operational Changes at LifeLabs:

- **Implication:** The operational changes at LifeLabs, particularly post-acquisition of Rocky Mountain Analytical, have led to new fees and stricter billing processes that affect service delivery. These changes not only contribute to rising costs for patients but also complicate the administrative processes for NDs.
- **Alignment with Healthcare Goals:** Expanding NDs' access to publicly funded lab services would align with provincial healthcare priorities, such as improving primary care access and reducing barriers to care. This inclusion would support NDs in providing more comprehensive and coordinated care, which is essential for enhancing the health system's effectiveness.

Next Steps

Advocacy for Inclusion in the LSA:

- BCND will continue to advocate for the inclusion of NDs under the LSA to enable access to publicly funded diagnostic services. This would help reduce financial burdens for patients and ensure more comprehensive care. BCND is actively engaging with the Ministry of Health to explore pathways for this inclusion.

Collaboration with LifeLabs:

- BCND will continue to engage with LifeLabs to address billing discrepancies, streamline the lab requisition process, and improve the reliability of services. This includes working on the accuracy of billing practices and reducing the administrative burden on NDs.

Request for a Clear and Fair Error Resolution Process:

- BCND will engage LifeLabs to establish a timely and streamlined error resolution process that ensures shared accountability when lab errors occur. This includes advocating for policies that prevent NDs from bearing the sole responsibility for resolving issues and managing patient communications when mistakes are made by LifeLabs.

Partnership Development with LifeLabs on Patient Communication Protocols:

- BCND will propose a co-creation of clear patient communication protocols with LifeLabs to improve transparency and ensure patients are informed of their options when lab errors occur. This collaborative approach aims to enhance patient confidence, reduce practitioner burden, and support a more seamless lab experience.

Training and Education for Members:

- BCND will work to provide training and resources to help members navigate the current system more effectively, including guidance on lab requisition practices, proper billing, and how to communicate lab policies to patients. This will help mitigate errors and ensure that NDs are well-prepared to manage their interactions with LifeLabs.

Government Engagement and Systemic Change:

- BCND will continue its dialogue with the Ministry of Health to highlight the importance of integrating NDs into the public healthcare system for lab services. BCND will advocate for the expansion of publicly funded diagnostic services to include NDs, aligning with provincial healthcare goals and improving primary care access.

Improvement of Lab Access in Underserved Regions:

- BCND will push for the expansion of LifeLabs' network to include underserved areas like the Sea-to-Sky corridor and other rapidly growing communities. The aim is to reduce travel time and wait periods for patients, particularly in regions where road conditions pose additional barriers to accessing care.

Ongoing Monitoring and Feedback:

- BCND will continue to gather feedback from members to monitor ongoing issues with LifeLabs and other lab service providers. This will help identify emerging challenges and ensure that BCND remains responsive to the needs of naturopathic doctors in the province.

Open Feedback Opportunities

At BCND, we are committed to understanding and addressing the challenges that naturopathic doctors (NDs) face in accessing lab services. We strongly encourage all members to share their experiences, concerns, or any specific issues

they have encountered with LifeLabs or other lab service providers. Rest assured, all feedback will remain anonymous and will only be used to help improve the experience and support NDs more effectively.

The more we hear from you, the more we can work together to make tangible changes and advocate for better solutions. Your insights are crucial to our ability to drive meaningful improvements in lab access and the broader healthcare system. By sharing your experiences, you help shape the future of lab services and ensure that your concerns are addressed in our ongoing efforts to make life easier for NDs and their patients.

Please contact Alix Arndt, Executive Director at BCND, via email at bcnd@bcnd.ca to provide your feedback. We genuinely appreciate your input and look forward to working together for positive change.