

October 6, 2025

Lorrie Cramb Executive Director, Provincial Chief Allied Health Officer Allied Health Policy Secretariat

Delivered via email

Dear Lorrie.

We are writing on behalf of BCND to share an urgent concern that goes to the heart of the Allied Health Strategic Plan and its goals of recruitment, retention, and workforce stability.

On September 23, the College of Complementary Health Professionals of BC announced a 25 percent increase to naturopathic doctor registration fees for this renewal year, with a total increase of 50 percent over two years, with no prior notice and no opportunity for meaningful engagement. While the College has the authority to set fees, that authority cannot be exercised in isolation from accountability. Registrants are entitled to clarity on how costs are determined, assurance that funds are managed responsibly, and meaningful engagement before increases of this magnitude are imposed. This decision has triggered deep concern among naturopathic doctors across the province—professionals who collectively see thousands of British Columbians each year and serve as a critical point of access for primary care. When one in three households in BC chooses to see an ND, the risk of providers leaving practice is not just a professional issue—it is a direct threat to patient access and continuity of care.

The fee increase has been justified by linking it to the Health Professions and Occupations Act and the oversight requirements of the new Superintendent's office. Yet the HPOA was passed without meaningful consultation, and its implementation has so far been marked by very short consultation periods, limited communication, and no transparency on how the associated costs were calculated. This approach is creating instability and mistrust at a time when the health system needs confidence, collaboration, and a focus on keeping practitioners in practice. The promise of HPOA was to bring clarity and modernization, yet without vision and leadership it is destabilizing an already fragile system. There is still an opportunity to change course, but it requires slowing the pace, restoring transparency, and demonstrating that government is committed to strengthening, not weakening, the system.

BCND is concerned not only about the financial impact on naturopathic doctors, but also about what this represents for the future of allied health professions under the HPOA. Sudden, dramatic increases in regulatory costs, paired with unclear communication, are not aligned with government's stated goals to strengthen and retain the health workforce. If this pattern continues, it risks driving providers out of practice and weakening the very professions that the Health Human Resources Strategy is counting on to close gaps in access and improve patient outcomes. What is needed now is not more disruption, but the courage to fix what is broken. The seeming absence of a roadmap has left practitioners uncertain about their future, and without transparency, the opportunity to build confidence and collaboration will be lost.

Associations like BCND are critical partners in implementing system change. We communicate policy shifts, prepare practitioners for regulatory transitions, and help maintain engagement with the system. When decisions are made without adequate consultation, associations are left reacting instead of partnering, which erodes trust and undermines stability.

We urge the Allied Health Policy Secretariat to take a leadership role in ensuring that HPOA implementation is transparent, paced appropriately, and aligned with the objectives of the Allied Health Strategic Plan. Regulatory colleges must be required to provide clear, data-driven justifications for cost increases, allow adequate time for consultation, and work collaboratively with associations to anticipate and mitigate impacts before decisions are finalized. Above all, the Secretariat must not miss this chance to create a stronger, more sustainable framework for allied health. With genuine collaboration, there is still room to build optimism and ensure that every practitioner remains part of the solution.



BCND would welcome the opportunity to meet with you to discuss how to strengthen engagement processes and ensure that HPOA implementation supports, rather than undermines, the shared goal of a sustainable allied health workforce.

Sincerely,

Dr. Vanessa Lindsay

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President

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CEO