

November 26, 2025

Honourable Brenda Bailey, MLA
Minister of Finance

Delivered via email

Dear Minister Bailey,

On behalf of the Association of BC Naturopathic Doctors (BCND), we are writing to request clarification regarding the financial accountability framework for regulatory colleges under the Health Professions and Occupations Act (HPOA), which is scheduled to come into force on April 1, 2026.

Under the current Health Professions Act (HPA), regulatory colleges operate as independent statutory corporations. They are funded primarily through registrant fees, governed by boards that include both elected and appointed members, and responsible for setting their own budgets, establishing fee structures, and publishing audited financial statements. This framework has provided clear lines of financial accountability and transparency for registrants and the public.

The HPOA introduces a different governance and oversight framework. All college board members will be appointed by the Minister of Health (section 346), and the Act creates the Superintendent of Health Professions and Occupations Oversight (section 435(1)) with authority to issue directives, conduct reviews, and determine the form and content of public reporting. Colleges will be required to submit annual reports to the Superintendent (section 398), including financial statements and any additional information that may be requested, and to maintain a public registry with budgetary information and other disclosures as directed (section 395).

In July 2025, government deposited orders under the Budget Transparency and Accountability Act (BTAA) designating each health profession regulatory college as a Government Reporting Entity (GRE). Relevant provisions include:

- Section 1 defines “government reporting entity” and establishes that entities included in the GRE must prepare their accounts in accordance with the accounting policies set by Treasury Board.
- Section 9 requires the preparation of audited annual financial statements for the government reporting entity and requires that these statements be consolidated into the Province’s Public Accounts.
- Section 10 sets out quarterly reporting requirements that must be prepared in accordance with Treasury Board-established accounting policies for entities in the government reporting entity.
- Section 23.1 authorizes Treasury Board to establish accounting policies for the government reporting entity, including any alternate standards from those normally required under generally accepted accounting principles.
- Section 24(3) requires that when an organization is added to or removed from the government reporting entity under section 24(2)(d), the minister must make public, as soon as practicable, a statement of the reasons for making that recommendation.

Because regulatory colleges are funded almost entirely through fees paid by health professionals, and because those fees have already risen sharply, being included as a GRE now raises direct questions about how fee-setting will work going forward, what level of reporting will be required, and whether government approval or review will form part of the process. These are foundational questions that must be addressed before the new regulatory framework takes effect.

For this reason, we respectfully request clarification on the following points, which fall directly under the Budget Transparency and Accountability Act and the financial oversight of the Ministry of Finance:

- Will health profession regulatory colleges, as GREs, be required to prepare financial statements in accordance with Public Sector Accounting Standards or other standards adopted under section 23.1 of the BTAA?
- Will the Ministry of Finance or Treasury Board have a role in reviewing or approving regulatory colleges’ budgets or professional fee levels?
- Will regulatory colleges be required to submit audited financial statements for public disclosure, consistent with other entities consolidated into the Public Accounts under section 9?

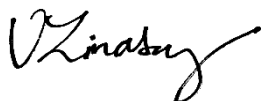
- Will regulatory colleges be required to submit annual service plans and annual service plan reports required under sections 13 and 16?
- Will increases in professional fees require prior government review or approval given GRE status and corresponding oversight expectations?
- What accounting, reporting, and public disclosure standards will regulatory colleges be required to meet as GREs, including where colleges may hold, administer, or distribute public funds under the HPOA?
- Will regulatory colleges qualify for any exemption under section 24(2)(d)(ii) of the BTAA, which allows certain health and education entities to be excluded from GRE reporting obligations?

These issues also intersect directly with government's broader Health Human Resources strategy. Stability, retention, and reducing barriers to practice are central to that strategy yet rising regulatory costs and uncertainty regarding GRE obligations have created avoidable concern for health professionals, many of whom are now unsure whether they will continue practising in this province. Clear direction on financial reporting, fee-setting expectations, and accountability requirements is necessary to maintain confidence in the regulatory system and prevent further destabilization of the workforce.

These questions have immediate and significant implications for how regulatory colleges structure their budgets, determine professional fees, and communicate financial obligations to the practitioners they regulate. With the HPOA implementation date approaching, clear government direction is required to ensure transparency, accountability, and stability.

We respectfully request your timely response clarifying how GRE requirements will apply to regulatory colleges. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "V Lindsay".

Dr. Vanessa Lindsay, ND
Board President

A handwritten signature in black ink, appearing to read "Alix Arndt".

Alix Arndt
CEO

Cc: The Honourable Josie Osborne, Minister of Health