



PRE-BUDGET CONSULTATION

The Canadian Chiropractic Association (CCA) is a national, voluntary association representing Canada's 8,500 licensed Doctors of Chiropractic. The CCA advocates on behalf of members and their 4.5 million patients to raise awareness of musculoskeletal (MSK) health and the effectiveness and efficiency of the healthcare system in providing MSK care.

RECOMMENDATION:

Amend *Income Tax Act*, s. 118.4 (2), to add chiropractors to the list of practitioners eligible to assess disability and issue the Disability Tax Credit Certificate.

Many Canadians suffering from a chronic MSK condition such as osteoarthritis, rely on chiropractic care to assess and manage their condition, and lessen the impact of symptoms, making it easier for them to accomplish activities of daily living.

The recommended change to the *Income Tax Act* would remove the current systemic barrier for these Canadians who have reached the point of disability due to chronic osteoarthritis or other musculoskeletal conditions, and have a severe and prolonged restriction on walking, feeding or dressing, to have appropriate access to the Disability Tax Credit.

For these Canadians, their chiropractor is often in the best position to assess the duration and effects of serious and chronic MSK conditions, but is not currently permitted under the *Income Tax Act* to help these patients by issuing the Disability Tax Credit Certificate. Instead, these patients must be referred to one of the other currently recognized providers. These patients are then put in the position of having to arrange and travel to an otherwise unnecessary appointment (redundant expense for provincial governments), which is a particular challenge outside of major urban areas, and having to undergo a redundant assessment from a provider who may not be as familiar with the patient or the current status of their MSK function or condition.

It is important to note that there are many other government programs such as Workers' Compensation where chiropractors are fully recognized as assessors. Doctors of chiropractic complete an intensive four year full-time program following university studies to prepare them to be MSK experts.

The primary beneficiaries of this proposed change are people with qualifying disabilities who currently have conditions, symptoms or limitations related to their disability treated by their chiropractor. In some cases, these patients with disabilities have not claimed the Disability Tax Credit due to barriers in accessing primary care services. Secondary beneficiaries include caregivers, family and friends of the patient who may be alleviated of the extra burden of unnecessary redundant visits to an additional healthcare provider.



The omission of chiropractors from the list of providers appears to be an oversight, but the impact can be meaningful on the lives of eligible Canadians. Recognizing chiropractors would not change eligibility for the Disability Tax Credit but instead reduce a significant barrier to accessing the Disability Tax Credit for these patients of chiropractors, and respect their choice of provider.

MUSCULOSKELETAL HEALTH: A PRIORITY FOR CANADIANS

Musculoskeletal conditions have a profound impact on Canada's economic welfare, stability and strength of the workforces, and levels of productivity.

RECOMMENDATION:

Support federal budget initiatives related to healthcare innovation and research, and a new Health Care Accord, that recognizes the tremendous impact of musculoskeletal conditions on the health and productivity of Canadians.

More than 11 million Canadians are affected by back pain and other musculoskeletal (MSK) conditions every year.¹ MSK conditions rival cardiovascular disease as an overall health burden, are the second leading reason for physician visits, and responsible for almost half of medical releases from Canadian Forces are for MSK conditions. Back pain and other MSK conditions also make it much more difficult to stay physically active, which is key to preventing and managing many chronic conditions, such as diabetes.

Innovation is critical to ensuring healthcare dollars are used effectively to improve quality of care and outcomes. Given the tremendous impacts, MSK conditions must be a significant part of efforts by the federal government to promote and support innovation. Canada's chiropractors are highly trained to be the primary contact profession focused on MSK health and conditions, and ready to be an engaged stakeholder in support of the development of a new multi-year health accord and other initiatives to improve access, efficiency and outcomes for the health of Canadians.

Over half of work days lost due to injury are for MSK conditions.²

MSK conditions significantly impact Canada's productivity, including disproportionately affecting workforce participation among lower income Canadians doing more physically-demanding labour, or impacted by other poverty-related issues including under-housing and limited access to appropriate healthcare. Up to 85% of workers will suffer from back pain at least once in their lifetime³ and often back pain will re-occur or become chronic. The disability costs alone are the most significant of any

¹ Building a Collective Policy Agenda for Musculoskeletal Health and Mobility; Canadian Orthopaedic Care Strategy Group backgrounder report. 2010.

² Marovino, T., & Sabo, J. (2014). Chapter 10: Musculoskeletal health: A critical determinant of productivity and an important element in overall wellness.

³ Andersson G. (1997). The epidemiology of spinal disorders. In: Frymoyer JW, ed. The adult spine: principles and practice, 2nd ed. Philadelphia: Lippincott-Raven, 93–141.

chronic disease at \$15 billion.⁴ There is an insufficient focus in current health innovation efforts dedicated to understanding, preventing and treating MSK conditions. Evidence shows that addressing MSK conditions in a strategic way would allow for existing health spending to be used more effectively.

A new Health Accord should include a specific recognition of the importance of enhancing the prevention and management of back pain and other MSK conditions, including support for the evaluation and implementation of innovations that can improve access to evidence-based primary care in this area. As a result, the Canadian Chiropractic Association (CCA) recommends that the Government of Canada invest strategically in the prevention and management of MSK health of Canadians, including as part of the Health Accord and dedicated research funding. More so, the CCA would welcome the opportunity to be recognized as a stakeholder in the development of the new Health Accord.

⁴ Mirolla, M. (2004). The Cost of Chronic Disease in Canada. Retrieved from <http://www.gpiatlantic.org/pdf/health/chroniccanada.pdf>