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*PRE-BUDGET CONSULTATION*

*ADDRESSING SYSTEMIC BARRIERS TO ACCESSING THE DISABILITY TAX CREDIT FOR  
ELIGIBLE CHIROPRACTIC PATIENTS*

*August 2016*

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## EXECUTIVE SUMMARY

The Canadian Chiropractic Association (CCA) is the national, voluntary association representing Canada's 8,500 licensed doctors of chiropractic. Approximately 4.5 million Canadians use the services of a chiropractor each year to help manage their musculoskeletal condition(s). The CCA advocates on behalf of members and their patients to advance the quality and accessibility of chiropractic care in Canada which includes raising awareness to a number of systemic barriers that negatively impact Canadians who suffer from musculoskeletal conditions, including those with chronic pain and disability.

Every year, more than 11 million Canadians are affected by at least one musculoskeletal condition.<sup>1</sup> Musculoskeletal conditions rival cardiovascular disease as an overall health burden, and are the number one cause of disability and lost time amongst our working populations.<sup>2</sup> By limiting activity, musculoskeletal conditions can also make it more difficult to manage other chronic conditions like cardiovascular disease and diabetes. The tremendous burden of musculoskeletal conditions is often under-estimated and overlooked as a key health priority, especially for those living in rural and remote communities who may have limited access to public healthcare.

Canada's economic growth and prosperity rests on a healthy and productive workforce. It is known that musculoskeletal conditions, including back pain, have a devastating impact on Canada's productivity, including disproportionately affecting workforce participation among lower income Canadians doing more physically-demanding labour, or impacted by other poverty-related issues. Reality remains that up to 85% of workers will suffer from back pain at least once in their lifetime<sup>3</sup> and often back pain will re-

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<sup>1</sup> Building a Collective Policy Agenda for Musculoskeletal Health and Mobility; Canadian Orthopaedic Care Strategy Group background report. 2010.

<sup>2</sup> Desjardins, D. (2006). Le fardeau de la maladie lié aux troubles musculosquelettiques au Canada. Prévention l'incapacité au travail : un symposium pour favoriser l'action concertée. Journées annuelles de la santé publique. Retrieved from <http://jasp.inspq.qc.ca/Data/Sites/1/SharedFiles/presentations/2006/JASP2006-Incapacite-SDesjardins2.PDF>

<sup>3</sup> 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.



occur or become chronic. The disability costs alone are the most significant of any chronic disease at \$15 billion.<sup>4</sup> Over half of work days lost due to injury are for musculoskeletal conditions.<sup>5</sup>

The burden is undeniable, but starting by addressing small, important systemic barriers to accessing benefits is one key step that the federal government could do to better support the musculoskeletal health of Canadians. We believe that Canada's tax system would be improved by reducing current barriers for Canadians who are patients of chiropractors and are eligible for the Disability Tax Credit due to joint dysfunction or other musculoskeletal conditions. As Canada's musculoskeletal experts, Canadian chiropractors are proposing one recommendation to improve the federal government's management of musculoskeletal conditions and associated impacts.

### 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.**

Commonly Canadians suffering from a chronic musculoskeletal condition such as osteoarthritis, rely on chiropractic care to assess, manage and monitor the progress of their condition, making it easier for them to accomplish activities of daily living and strive to return to productive living. Alone, osteoarthritis limits the ability of over 3 million Canadians to do the activities they love due to pain and loss of function. In time of need, Canadians rely on federal programs and tax credits to support them while they recover and aim to return to work.

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 musculoskeletal 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 this patient or the current status of their musculoskeletal function or condition. Compounded by the lack of access to primary care in rural and remote communities, access can be nearly impossible for those suffering from a disability related to a chronic musculoskeletal condition commonly managed by a local chiropractor.

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

<sup>5</sup> Marovino, T., & Sabo, J. (2014). Chapter 10: Musculoskeletal health: A critical determinant of productivity and an important element in overall wellness. Retrieved from <file:///C:/Users/fleblanc/Downloads/TizJulie%20article.pdf>

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

The 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. Common severe disabilities managed by a chiropractor include degenerative joint disease (i.e. osteoarthritis), and chronic low back and neck pain. In some cases, these patients with disabilities have not claimed the Disability Tax Credit due to barriers in accessing primary care services. If accessed, the credit can be a valuable relief to support recovery. Other 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. Moreover, amendments to the *Income Tax Act* can help increase the productivity of Canadians living with musculoskeletal conditions by providing them with the care they need in a timely manner; contributing to a healthy workforce and greater economic growth for our nation as a whole. Economic prosperity can only be achieved if we have a healthy workforce to support it.