Legislative Proposal Relating to the Income Tax Act and the Income Tax Regulations

Department of Finance

July 2026

Contact

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Executive Summary

The Canadian Chiropractic Association (CCA) appreciates the opportunity to provide comments on the Department of Finance's on the July 2026 the draft legislative proposal relating to the Income Tax Act and Income Tax regulations. The following recommendations are intended to improve access to the Disability Tax Credit (DTC) by recognizing chiropractors as qualified practitioners for assessing and certifying eligible impairments.

Recommendation: Amend the Legislative Proposal to Include Chiropractors

The CCA recommends that the legislative proposal be amended to add chiropractors as eligible practitioners to assess for the DTC and for the legislative proposal to read as follows:

> 2 (1) The portion of subsection 118.4(2) of the Act before paragraph (a) is replaced by the following:
>
> **Reference to medical practitioners, etc.**
>
> (2) For the purposes of sections 63, 64, 118.2, 118.3 and 118.6, a reference to an audiologist, **chiropractor**, dentist, medical doctor, medical practitioner, nurse, nurse practitioner, occupational therapist, optometrist, pharmacist, physiotherapist, podiatrist, psychologist or speech-language pathologist is a reference to a person authorized to practise as such,

Recommendation: Authorize Chiropractors to Assess Impairments

The CCA recommends that chiropractors be able to assess for the DTC and be authorized to certify the effects of severe and prolonged musculoskeletal impairments on walking, dressing, and feeding. The CCA recommends that the legislative proposal be amended to add following:

> (3) Subparagraph 118.3(1)(a.2)(iv) of the Act is replaced by the following:
> (iv) an impairment with respect to an individual's ability in feeding or dressing themself, an occupational therapist, **a chiropractor,** or a physiotherapist,
>
> (4) Subparagraph 118.3(1)(a.2)(v) of the Act is replaced by the following:
> (v) an impairment with respect to an individual's ability in walking, an occupational therapist, a physiotherapist, **a chiropractor** or a podiatrist,
>
> (6) Subparagraphs 118.3(1)(a.3)(i) and (ii) of the Act are replaced by the following:
> (i) an impairment with respect to the individual's ability in feeding or dressing themself, or in walking, **a chiropractor,** a medical doctor, a nurse practitioner, an occupational therapist or a physiotherapist,

1. **Amend the Legislative Proposal to the Income Tax Act to allow chiropractors to assess patients for the Disability Tax Credit**

   As the Prime Minister stated: "Canada is a dynamic country that celebrates our diversity, cares for the most vulnerable among us, and strives for a better future for all."[1] The government's commitment to develop a Disability Inclusion Action Plan to improve the lives of Canadians living with disabilities is a bold and just vision.

   In support of this vision, the Government of Canada has taken steps to modernize the Disability Tax Credit framework by expanding recognition of qualified health professionals who can support Canadians in accessing this important benefit. The Spring Economic Update announced that podiatrists would be added to the list of qualified practitioners eligible to certify impairments for the purposes of the Disability Tax Credit (DTC). Currently, medical doctors and nurse practitioners may certify all impairment categories, while optometrists, audiologists, occupational therapists, physiotherapists, psychologists, and speech-language pathologists may certify specified categories within the statutory framework. This represents a positive step toward improving accessibility, reducing administrative barriers, and enhancing equitable access to the DTC for Canadians living with disabilities.

   However, despite this welcome progress, the proposed amendments fail to include chiropractors, even though chiropractors are regulated healthcare professionals with the education, training, and clinical expertise to assess and certify many of the musculoskeletal impairments relevant to DTC eligibility. The omission of chiropractors represents a missed opportunity to further improve timely access to the program and ensure equitable recognition of all qualified regulated health professionals. This is a regulatory gap that creates unnecessary barriers and bottlenecks and limits the federal government's ability to deliver timely supports to eligible Canadians.

Recommendation

The CCA recommends that the legislative proposal be amended to add chiropractors as eligible practitioners to assess for the DTC and for the legislative proposal to read as follows:

2 (1) The portion of subsection 118.4(2) of the Act before paragraph (a) is replaced by the following:

Reference to medical practitioners, etc.

(2) For the purposes of sections 63, 64, 118.2, 118.3 and 118.6, a reference to an audiologist, **chiropractor**, dentist, medical doctor, medical practitioner, nurse, nurse practitioner, occupational therapist, optometrist, pharmacist, physiotherapist, podiatrist, psychologist or speech-language pathologist is a reference to a person authorized to practise as such,

[1] Rt. Hon. Mark Carney, Mandate Letter, May 21, 2025.

Our recommendation has already been carefully considered and endorsed. In its 2018 pre-budget consultation report, the House of Commons Standing Committee on Finance recommended that the Income Tax Act be amended to add chiropractors to the list of practitioners eligible to assess and certify disability and issue the DTC.[2]

The recommendation is supported by a broad coalition of health professional and disability organizations. The Council of Canadians with Disabilities provided a letter of support in 2016, while the Canadian Nurses Association and Arthritis Society Canada each provided letters of support to the CCA in 2018. More recently, Disability Without Poverty submitted a letter of support in 2026 endorsing the CCA's recommendation. Please see appendix below.

This oversight:

- Can delay and impede access for eligible individuals with severe and prolonged mobility or other musculoskeletal restrictions by requiring them to seek certification from another practitioner.
- Will result in avoidable referrals to medical doctors, nurse practitioners, occupational therapists or physiotherapists for certification, while a chiropractor already has detailed knowledge of the patient's relevant functional restrictions.
- Contradicts the government's stated goal of improving access and inclusion for Canadians with disabilities.

Chiropractic patients who meet the DTC eligibility criteria face an additional obstacle in applying for the credit because the chiropractors they regularly rely on are not authorized by the federal government to assess patients for this important benefit. This creates inequitable access pathways based solely on provider type, rather than patient need. In addition, chiropractors can help alleviate the administrative burden on doctors and the healthcare system.

2. **Amend the Legislative Proposal to the Income Tax Act to authorize chiropractors certify specified functional impairments for the Disability Tax Credit for certain impairments.**

The Canadian Chiropractic Association (CCA) supports the proposed expansion of the impairments that physiotherapists, occupational therapists, speech-language pathologists, and podiatrists may certify for the purposes of the Disability Tax Credit (DTC). Aligning certification authority with each profession's scope of practice will improve timely access to the program, reduce unnecessary administrative barriers, and enable Canadians to receive assessments from the health professionals most directly involved in their care.

[2] Canada. 42-nd Parliament. 1-st Session. House of Commons. Standing Committee on Finance, Cultivating Competitiveness: Helping Canadians Succeed, Recommendation Number 23, December 2018.

However, these same principles should extend to the chiropractic profession. Chiropractors are regulated healthcare professionals with extensive education and expertise in the assessment, diagnosis, and management of musculoskeletal conditions. These conditions can produce severe and prolonged restrictions in walking, dressing, and other basic activities of daily living that may qualify an individual for the DTC. To ensure consistency, equity, and patient-centred access, the CCA strongly recommends that chiropractors also be authorized to certify impairments that fall within their legislated scope of practice.

Recommendation

The CCA recommends that chiropractors be able to assess for the DTC and be authorized to certify the effects of severe and prolonged musculoskeletal impairments on walking, dressing, and feeding. The CCA recommends that the legislative proposal be amended to add following:

(3) Subparagraph 118.3(1)(a.2)(iv) of the Act is replaced by the following:

(iv) an impairment with respect to an individual's ability in feeding or dressing themself, an occupational therapist, **chiropractor,** or a physiotherapist,

(4) Subparagraph 118.3(1)(a.2)(v) of the Act is replaced by the following:

(v) an impairment with respect to an individual's ability in walking, an occupational therapist, a physiotherapist, **chiropractor** or a podiatrist,

(6) Subparagraphs 118.3(1)(a.3)(i) and (ii) of the Act are replaced by the following:

(i) an impairment with respect to the individual's ability in feeding or dressing themself, or in walking, a **chiropractor,** medical doctor, a nurse practitioner, occupational therapist or a physiotherapist,

Conclusion

The CCA appreciates the opportunity to provide feedback on the Department of Finance Canada’s July 2026 consultation on the draft legislative proposals. The CCA supports the government’s efforts to modernize the Disability Tax Credit (DTC) framework by recognizing the expertise of additional health care professionals and improving access for Canadians with disabilities.

Chiropractors are regulated health professionals with extensive education, training, and clinical expertise in the assessment and management of musculoskeletal conditions, including those affecting mobility, function, and activities of daily living. Recognizing chiropractors within the DTC certification process would improve access for eligible Canadians, reduce unnecessary administrative barriers, and ensure that assessments are completed by practitioners with appropriate expertise.

The CCA respectfully requests that the Department of Finance Canada consider the recommendations outlined in this submission and amend the legislative proposals to include chiropractors as eligible practitioners for the purposes of the Disability Tax Credit. The CCA welcomes the opportunity to continue working with the Government of Canada and stakeholders to support an accessible, fair, and effective DTC system for all Canadians.

About the Canadian Chiropractic Association

The CCA is the national voice for more than 8,000 licensed chiropractors across Canada. Chiropractors are primary contact healthcare professionals with expertise in diagnosing, managing, and treating musculoskeletal (MSK) conditions such as back pain, neck pain, arthritis, and joint dysfunctions using non-invasive, evidence-based approaches.

Appendix:

Letters of Support

July 27th 2026

To Department of Finance Canada Consultation on Draft Legislative Proposals Income Tax Act & Income Tax Regulations

Re: **Letter of Support for Amendments to the Income Tax Act – Disability Tax Credit (DTC) Practitioner Eligibility**

Disability Without Poverty is pleased to provide this letter of support for the Canadian Chiropractic Association's submission regarding proposed amendments to the Income Tax Act and Income Tax Regulations related to the Disability Tax Credit (DTC).

We strongly support the recommendation to recognize chiropractors as qualified practitioners for assessing and certifying impairments relevant to DTC eligibility. Chiropractors are regulated primary healthcare professionals with extensive education, training, and clinical expertise in musculoskeletal conditions, including impairments affecting mobility, dressing, feeding, and other activities of daily living. As noted in the CCA's submission, chiropractors routinely assess and manage functional limitations that fall squarely within the scope of impairments contemplated under the DTC framework .

The government's recent steps to modernize the DTC, including expanding certification authority to podiatrists, physiotherapists, occupational therapists, and speech-language pathologists, represent meaningful progress toward improving accessibility and reducing administrative barriers. However, the omission of chiropractors creates an unnecessary gap that limits timely access for Canadians who rely on chiropractic care as part of their ongoing disability-related support needs. This gap also places additional administrative burden on family physicians, despite chiropractors being well-positioned to complete these assessments based on their regulated scope of practice .

We also note that the House of Commons Standing Committee on Finance recommended in 2018 that chiropractors be authorized to complete DTC assessments, and that this recommendation has been supported by multiple disability and health organizations across Canada, including Disability Without Poverty .

Recognizing chiropractors within the DTC certification process would:

- Improve timely access to the DTC for eligible Canadians
- Reduce administrative bottlenecks in primary care
- Ensure assessments are completed by practitioners with appropriate expertise
- Advance the government's stated commitment to disability inclusion and equitable access

For these reasons, Disability Without Poverty supports the Canadian Chiropractic Association's proposed amendments to subsection 118.4(2) and related provisions of the Income Tax Act to include chiropractors as eligible practitioners for certifying impairments under the Disability Tax Credit.

We appreciate the opportunity to contribute to this consultation and encourage the Department of Finance to adopt these amendments to strengthen accessibility, fairness, and efficiency within the DTC system.

Sincerely,

Rabia Khedr, MA
Chief Executive Officer
Disability Without Poverty/Le handicap sans pauvreté

CANADIAN NURSES ASSOCIATION
ASSOCIATION DES INFIRMIÈRES ET INFIRMIERS DU CANADA

December 19. 2018

Via email: Bill.Morneau@canada.ca
Hard copy to follow via mail

The Hon. William Francis Morneau
Minister of Finance
Department of Finance Canada
90 Elgin Street
Ottawa, ON K1A 0G5

Dear Minister Morneau:
In my recent meeting with representatives of the Canadian Chiropractic Association (CCA), the Canadian Nurses Association (CNA) discussed their 2019 Pre-Budget submission to authorize chiropractors to assess and certify patients for the federal Disability Tax Credit (DTC) and their appearance in front of the Standing Committee on Finance to present on the matter.

Canada's 9,000 licensed Doctors of Chiropractic are regulated musculoskeletal (MSK) experts who play a critical role in supporting the care of patients with disabilities. The authority to diagnose disability currently already exists at the provincial level, with chiropractors recognized as assessors under numerous programs such as Workers' Compensation, and Motor Vehicle Accident rehabilitation.

The CCA's concern is for patients who meet the criteria for disability and have been working to manage significant symptoms related to MSK conditions with their chiropractors. Most common among these conditions is osteoarthritis, which disproportionately affects seniors and women. It is my understanding that with the proposed change, these individuals will not be forced to schedule an additional visit to another profession who may not know the patient's history.

Additionally, as President of CNA, I am encouraged that strong patient advocates including the Arthritis Society and the Canadian Council of Disabilities are supporting this change and have expressed it would help their members.

This proposal improves access to an important program for disabled Canadians. To that end, CNA fully supports the efforts of the CCA in urging the federal government to add chiropractors as assessors for the Disability Tax Credit in Budget 2019.

For more information on this recommendation, please contact Ms. Alison Dantas, CEO, at adantas@chiropractic.ca or at 1-877-222-9303 ext. 226.

Yours sincerely,

Claire Betker
CNA President

cc: *Joël Lightbound*, M.P., Parliamentary Secretary to the Minister of Finance
Ben Chin, Chief of Staff for the Minister of Finance
Alison Dantas, CEO, Canadian Chiropractic Association

The Honourable Bill Morneau, PC, MP,
Minister of Finance
Finance Canada
90 Elgin Street
Ottawa, ON
K1A 0G5

Via Email: Bill.Morneau@parl.gc.ca

Dear Minister,

The Arthritis Society is a national health charity, fueled by donors and volunteers, with a vision to live in a world where people can be free from the devastating effects that arthritis can have on their lives.

Arthritis is Canada's most prevalent chronic health condition. As many as one in five Canadians have arthritis. Women are more likely to have arthritis, with 59.5% of people with arthritis being women. Osteoarthritis (OA) is the most common type of arthritis, affecting more Canadians than all other forms of arthritis combined.

There is currently no cure for OA. However, there are options that can help reduce risk, relieve pain, and improve function. One such option, and one of the most commonly used, is chiropractic care.

A significant proportion of people living with OA report difficulties with activities of daily living, such as doing housework and running errands, and report needing assistance with aspects of daily life. Many Canadians suffering from osteoarthritis trust their chiropractor to help manage pain and improve function that can restrict activities of daily living including dressing, walking, and feeding. The Arthritis Society both recognizes and values the expertise of chiropractors in the assessment and management of conditions such as OA that can progress to the point of disability.

There are, however, barriers for these patients. Currently, a patient of a chiropractor suffering from markedly or severely restricted function or mobility due to OA must make an appointment with another health practitioner in order to have access to the Disability Tax Credit. This, despite their chiropractor knowing their pain history and being recognized to assess disability under many provincial government programs. To that end, **we encourage the Government of Canada to fix a serious oversight in the *Income Tax Act* by including chiropractors as qualified assessors to determine eligibility for the Disability Tax Credit in Budget 2018**.

Correcting this oversight doesn't require the expansion of the Disability Tax Credit. Instead this change simply makes it easier to access the benefits to which disabled Canadians are already entitled. We encourage the government to allow patients of chiropractors suffering from severe OA to be able to work with their doctors to apply for the Disability Tax Credit.

We are hopeful that the government implements this change in Budget 2018.

Sincerely,

Janet Yale
President and CEO

Société Arthrite Arthritis Society

1700 - 393 University Ave. | Rue University, Toronto, ON M5G 1E6 | arthritis.ca | arthrite.ca

February 2, 2016

Honourable Bill Morneau, PC, MP
Minister of Finance
Finance Canada
90 Elgin Street
Ottawa, Ontario
K1A 0G5

Via E-mail: Bill.Morneau@parl.gc.ca

Dear Minister Morneau,

The Council of Canadians with Disabilities (CCD) is a national organization of people with disabilities working for an inclusive and accessible Canada. CCD has been working collaboratively with the Department of Finance to make Canada's tax system fairer for people with disabilities. For example, in 2004 the Minister of Finance released and supported a report of the Technical Advisory Committee on Tax Measures for Persons with Disabilities, *Disability Tax Fairness.* CCD was a member of the Technical Advisory Committee.

CCD recognizes the expertise of chiropractors in the assessment and management of musculoskeletal (MSK) conditions, including the severe and prolonged conditions that can lead to disability. We support an amendment to the *Income Tax Act* to include chiropractors as recognized providers to determine eligibility for the Disability Tax Credit Certificate.

Chiropractors are part of the healthcare team for many Canadians who have a chronic MSK condition, including degenerative joint disease. They rely on the expertise of their chiropractor to assess and manage their condition and lessen the impact of symptoms, including making it easier for them to accomplish many activities of daily living.

It is our understanding that recognizing chiropractors would not change eligibility but instead reduce a significant barrier to accessing the Disability Tax Credit Certificate for these patients of chiropractors

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who meet the current criteria, respect their choice of provider, and avoid requiring an additional appointment with another provider who may not have the same familiarity with their condition.

The omission of chiropractors from the list of eligible providers appears to be an oversight, but has significant implications. We are asking the federal government to amend the *Income Tax Act* to add chiropractors to the list of practitioners eligible to assess disability and issue the Disability Tax Credit Certificate.

Thank you for your consideration.

Sincerely,

Tony Dolan,
Chairperson,
Council of Canadians with Disabilities