

**Written Submission for the Pre-Budget
Consultations in Advance of the Upcoming
Federal Budget**



July 2025

List of Recommendations:

- **Recommendation #1:** That the government eliminate the requirement for a disability certificate to claim part-time attendant care **in** the home to ensure the new Ontario Seniors Care at Home Tax Credit (OSCAH) reaches as many Ontario seniors as possible who need this assistance to help them stay in their homes.
- **Recommendation #2:** That the government expand the GST/HST exemption in the *Excise Tax Act* for services rendered to individuals by certain health care practitioners to include services rendered by personal support workers (PSWs).

Recommendation #1: Remove Disability Certificate Requirement to Claim the OSCAH Tax Credit for Part-Time Attendant Home Care

Background:

Seniors across Ontario are increasingly choosing to age and receive care at home. This means that the home care system is now delivering more care than any other part of the health care system combined, yet demand continues to outpace available resources. As a result, more and more seniors and their families have begun funding their own care or supplementing the care they are already receiving. To help offset these costs, the Ontario government introduced the new OSCAH in 2022. This is an important change as in-home care services are critical supports that help keep seniors healthy, safe at home and out of hospitals and other publicly-supported facilities. Often, just a few hours of care a week is enough to keep seniors living independently at home and prevent unnecessary illness or accidents.

The Issue:

The OSCAH is a refundable personal income tax credit that is tied to the federal process for approving the medical expense tax credit, with eligible recipients receiving a maximum credit of \$1,500. The issue is, however, that eligible expenses for the OSCAH must also qualify for the federal medical expense tax credit which requires a disability certificate (Form T2201) in order to claim part-time attendant care at home which must be approved by the Canada Revenue Agency (CRA). While many seniors living with physical and brain health issues receive home care, most do not have the level of physical or mental impairment to meet CRA's stringent eligibility criteria for a disability certificate.

These seniors will not be able to claim expenses related to the in-home care they depend on to keep them healthy, safe and living at home. This could mean some of these seniors would no longer be able to afford these necessary and critical home care services. The loss of access to these services would both undermine their own health and may force families to consider permanent placement in long term care. It could also put further strain on our overburdened ER's, hospitals and broader health care system.

Recommendation:

Home Care Ontario respectfully asks the federal government to **eliminate the requirement for a disability certificate to claim part-time attendant care in the home in the upcoming budget** to ensure the new OSCAH reaches as many Ontario seniors as possible who need this assistance to help them stay in their homes.

Recommendation #2: Expand the GST/HST exemption in the *Excise Tax Act* for services rendered to individuals by certain health care practitioners to include PSWs.

Background:

The *Income Tax Act* has not been updated to reflect the changing role of home care in the health care system since 2013. The current provision only allows for an HST exemption when a client is also receiving government funded support and is only eligible for certain types of care received. This approach puts a difficult onus on external care providers, to verify if government funded supports are provided to clients before exempting HST from their invoices.

The Issue:

The continued evolution of a patient has created two issues regarding the exemption. The first is that as a client's medical circumstance can change quickly, or they may even transition to a different care setting. It is very difficult for providers to know if their client's care is being publicly subsidized on an ongoing basis in order to continue qualifying for an HST exemption.

The second issue is that the strong desire to age at home has meant an increasing amount of care in the home care space is delivered by Personal Support Workers (PSWs). These services, however, do not qualify for the HST exemption as government officials have previously stated that this exemption is typically reserved for care provided by regulated health services (such as nursing, chiropractor, OT services, midwife). They further indicated that professional oversight would be needed for any further extension of the exemption, but that a profession does not need to be regulated across the entire country to receive an HST exemption.

We have seen several provinces move to regulate or provide oversight for PSWs in recent years. Most recently, the [Health and Supportive Care Providers Oversight Authority Act, 2021](#) (HSCPOA Act), was enacted by the Ontario government to support public protection and confidence that registered PSWs will deliver safe, competent, ethical, quality care to recipients in their homes, hospitals, long-term care facilities, or other health care environments. The legislation came into force on December 1, 2024.

HSCPOA also established the [Health and Supportive Care Providers Oversight Authority \(HSCPOA\)](#) as an independent oversight body accountable to the Ontario government where PSWs can be registered and listed on the registry.

With this new authority in Ontario, oversight of PSWs is now in place in four provinces ([Nova Scotia](#), [Alberta](#), [British Columbia](#) and [Ontario](#)), and it is now an appropriate time for the Government of Canada to move forward on an HST exemption for services rendered by PSWs and all home care services.

Recommendation:

Home Care Ontario recommends that the federal government expand the GST/HST exemption in the *Excise Tax Act* for services rendered to individuals by certain health care practitioners to include services rendered by PSWs.

About Home Care Ontario:

Home Care Ontario is a member-based organization representing the full spectrum of home care providers in the province, including publicly-funded, not-for-profit and family-funded organizations. Our members are united by a singular mission to provide outstanding nursing care, home support services, personal care, physiotherapy, occupational therapy, respiratory therapy, infusion pharmacy, social work, dietetics, speech language therapy and medical equipment and supplies to people in the comfort of their homes.