



A Study of the Disability Benefit Professionals Industry: Serving Taxpayers

Prepared for: The Association of Canadian Disability Benefit Professionals

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EXECUTIVE SUMMARY

In Canada, disability benefit professional firms (called promoters in the legislation) exist to help disabled taxpayers and their caregivers claim the federal Disability Tax Credit (DTC). They charge a fee for their service, generally in the form of a percentage of the past overpayment secured on behalf of the taxpayer (not future refunds or credits). Passed in May 2014, Bill C-462 Disability Tax Credit Promoters Restrictions Act seeks to set the maximum fee charged by these professional firms.

On behalf of the Association of Canadian Disability Benefit Professionals, BDO reviewed the economics of the DTC disability benefit professional industry through interviews with leaders of these firms and other third parties, research into similar credit programs, and analysis of provided data about the service model, fees and operating costs. Our key insights include:

- Taxpayers are not compelled to use the services of DTC professionals; *taxpayers have options for assistance in claiming the DTC*. Furthermore, there is differentiation between DTC professionals' service levels and fee options allowing taxpayers to select the service that meets their needs.
- There is a need for the service. *Taxpayers are using DTC professional services*. The industry has grown since 2008 with an estimated 15% of taxpayers who claimed the credit using the service.
- Studies highlight that 60% of eligible taxpayers are NOT claiming the credit. *DTC professional services helps taxpayers overcome several of the known barriers associated with this unacceptably low uptake* - the DTC awareness and complexity of the CRA process.
 - The industry helps address awareness through *promotion targeted at eligible taxpayers who are not receiving the credit*
 - The industry helps address a burdensome and complex process by applying their *expertise* in helping the community *navigate the process from start to resolution*. The disability benefit professional service model goes beyond assisting a taxpayer to submit form T2201 DTC Certificate Part A (DTC

Certificate) and claiming the disability-related tax deductions on their T1 Individual Income Tax and Benefits Return. Professionals help

- The *industry has formed an association and developed a code of conduct* that outlines practices for marketing and relationships with doctors and clients as well as setting a maximum 30% contingency fee. Currently, disability benefit professional firms do not receive any compensation with respect to future credits or refunds.
- The *contingency fee model is an advantageous model that offers numerous benefits* including simplicity and minimizing financial barriers for disabled seeking assistance (it only requires payment if taxpayers receive a credit); it is similar to that of professional advisors of other federal credits and professionals such as lawyers, realtors, & others. The fee maximum to be set under the regulations should recognize the model already established by the industry under normal competitive market conditions including existing differentiation of service options and industry competition as well as the work involved in supporting eligible taxpayers through to the conclusion of the process.

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INTRODUCTION

In Canada, there exists an industry of disability benefit professional firms (called promoters in the legislation) to help disabled taxpayers and their caregivers claim the federal Disability Tax Credit (DTC). In May 2014, a private members bill, Bill C-462 Disability Tax Credit Promoters Restrictions Act, was passed and seeks to set the maximum fee a DTC promoter can charge and establish penalties for those who fail to comply.

This report summarizes BDO's review of the DTC professional industry on behalf of the Association of Canadian Disability Benefit Professionals and provides insight for consideration as the regulations supporting the Bill, including the fee maximum, are developed.

To develop this report in 2016, BDO conducted interviews with leaders of disability benefit professional firms and other third parties (see Appendix A for a list of interview participants) as well as research into the industry and the recent Bill. Using this input, BDO developed a generic business model for the disability benefit industry in Canada, documenting the activities required to provide the service and fees. Updates to this document in 2019 reflect recent research and information provided by the industry.

THE DISABILITY TAX CREDIT

The DTC is a non-refundable tax credit used to reduce income tax payable by persons with severe and prolonged mental or physical disabilities and their caregivers.

The purpose of the DTC is to provide for greater tax equity by allowing some relief for disability costs, since these are unavoidable additional expenses that other taxpayers don't have to face.

(Canada Revenue Agency, 2019)

In 2005, the DTC was expanded to allow eligible disabled persons and caregivers to adjust their income tax returns for the previous ten years to claim unused credits and collect past tax overpayments.

Often called a “gateway” credit, a certified person is then eligible for other federal, provincial, or territorial programs such as provincial/territorial tax credits, the Registered Disability Savings Plan (RDSP), the child disability benefit, and the working income benefit (Canada Workers Benefit) disability supplement.

As outlined by CRA in its publications, to apply for the DTC, Part A of *Form T2201 Disability Tax Credit Certificate* contains biographical information is completed by the person with the disability (or a legal representative) and Part B is completed by a qualified medical practitioner (a doctor or other medical professional) to certify the disability. The form is then submitted to a Canada Revenue Agency (CRA) tax centre, reviewed by CRA and any follow-up requests are addressed, and then CRA approves or denies their eligibility.

For those approved disabled adult persons, the value of the federal tax credit is \$8,235 (Canada Revenue Agency, 2019). As a tax credit, lowest tax rate (15%) is applied to this amount so the actual tax reduction is much less. Taxpayers see their tax payable reduced by \$1,235 in addition to any provincial/territorial tax credits and other credits.

CRA published statistics for the 2011 to 2018 calendar years noting that the number of claimants (unique tax filers were currently claiming the disability tax credit) was 844,020 in 2018 up 39% since 2011 when 606,080 were claiming the credit. In 2018, 371,510 new applications were submitted; 333,440 (or 90%) were ultimately approved including those that

were initially rejected. The Canada Revenue estimates shows that the DTC was \$1,386M in 2018. (Canada Revenue Agency, 2019)

THE DTC DISABILITY BENEFIT PROFESSIONAL INDUSTRY

In Canada, there exists an industry of disability benefit professional firms that work with disabled Canadians and their caregivers to claim the DTC for past years.

Sixteen of these professional firms, the majority of the industry, are members of the Association of Canadian Disability Benefit Professionals (ACDBP). (Association of Canadian Disability Benefit Professionals, 2019)

As the industry matured, firms responded to the need to self-regulate their business practices by forming an industry association. ACDBP members respect a code of conduct that outlines practices for fees, marketing, and relationships with doctors and clients. Recognizing their position of working with disabled Canadians, many of whom can be in vulnerable positions, member firms pledge to act in a transparent and honest manner.

The Association will strive to ensure barrier-free access to benefits for Canadians living with a long-term disability.

(The Association of Canadian Disability Benefit Professionals, 2019)

Several reports have highlighted barriers that eligible Canadians face in accessing the DTC. Disability benefit professional firms' services assist eligible disabled and their caregivers receive the DTC.

A 2018 study published by the University of Calgary's School of Public Policy estimates that *60% of qualified adults are not receiving the credit* calling the credit The report cited barriers including lack of awareness and complexity of the application process. (Dunn, 2018)

Similarly, the Standing Senate committee on Social Affairs, Science and technology noted that the *credit is underused* citing similar barriers - troubles claiming the credit, complex administration and others - in their June 2018 report Breaking Down Barriers. (Standing Senate Committee on Social Affairs, Science and Technology, 2018)

These barriers have resulted in a need that disability benefit professionals help address by:

- Building *awareness* about the DTC through active promotion activities such as advertising, cultivation of referrals, seminars (including those hosted by service

organizations for the disabled), and others targeted at the 60% of qualified adjusters who are not receiving the credit

- Assisting clients in applying for the DTC by working with many individuals including the disabled, multiple family members, their caregivers, and their medical team (including paying any fees on behalf of the client to medical practitioners) to *complete the T2201 forms* in the manner expected by CRA and to ensure the credit due to the taxpayer is fully maximized
- Assisting clients in the *certification submission process* by, for example:
 - seeking answers from the disabled and their caregivers to respond to CRA follow-up questions or liaising with medical practitioners to ensure responses are submitted in a timely fashion
 - covering out-of-pocket fees charged by medical practitioners for completing the form and other services not covered under provincial healthcare programs removing this financial barrier for those disabled who are unable to pay these fees themselves
- Providing tax advice and *adjusting up to ten years of past tax returns* to claim the any federal and provincial credits owed and return past tax overpayments
- Working with additional family members to transfer the credit *adjusting up to ten years of past tax returns*
- Assisting clients with CRA's *appeal process* should the initial application be denied that includes support through a process that can often take months to resolve
- Assisting clients with the *Tax Court of Canada process* should the issue require resolution at this level

Disability benefit professional firms are experts in the DTC. Over the past fifteen years, these professionals have built in-depth knowledge of the certification submission process and the criteria as well as the related tax complexities that may be associated with a claim (such as bankruptcies, divorce, death, trusts, and others). This expertise allows them to *advocate effectively for their disabled and caregiver clients so that they receive entitled tax credits.*

One firm illustrates this expertise by showing 66% of previously rejected applications are now approved and 33% of previously approved applications got more money returned with the help of their services.

Clients of a disability benefit professional firm, who now have a Disability Tax Credit Certificate approved by CRA, will then be in a position to claim for themselves the DTC and other tax credits and programs going forward without the help of the firm. Currently, disability benefit professional firms do not receive any compensation with respect to future credits or refunds nor from benefits from other programs.

Disability benefit professional firms are not the only option that taxpayers who are seeking assistance have in the market. Other options exist as well as competition between firms on fees.

Taxpayers seeking to claim the DTC have several options for help in submitting a certification for the DTC. They can complete the form along with a qualified medical practitioner and submit it along with any necessary tax adjustment forms to CRA using, if necessary, CRA's guides available on the CRA website, and information from the CRA general inquiries call centre. CRA provides generic information as it is not mandated to provide tax advice. However, it should be noted that according to the Fall 2017 Auditor General of Canada's report that CRA call centre agents answer only about a third of calls leaving taxpayers with limited access to information. Furthermore, the same report noted that the wrong information was given almost 30% of the time highlighting lack of achievement of the commitment the CRA made under the Taxpayer Bill of Rights to provide accurate information. (The Auditor General of Canada, 2017)

As with any tax matter and as outlined under the Taxpayer Bill of Rights, individuals not wishing to complete the process on their own can be represented by a person of their choice and many seek professional advice on the process and tax related issues. Several options exist including disability tax credit professionals. However, taxpayers are not compelled to use a disability benefit professional firm. Alternate options include:

- Accountants and other tax professionals. Taxpayers can use the services of accountants, tax preparers and other services for tax assistance to claim the DTC.

- **Constituency Offices.** Many Members of Parliaments’ constituency offices offer taxpayers help with the T2201 form.
- **Charities and service organizations.** Taxpayers can seek assistance from charities and service organizations dedicated to helping the disabled with the T2201 form.

The following table summarizes the typical services (as outlined above) provided by each of these options. Note, in all cases, the use of the disability benefit professional or other option does not replace the role of CRA or the medical practitioner in the process.

Assistance Options	Promote Awareness of DTC	Assist with T2201 Form	Assist with Certification Submission Process*	Advise & Adjust Past Taxes	Assist with Appeals (if necessary)	Assist with Tax Court (if necessary)
Tax Professionals	✓	✓		✓	Note: these professionals do not typically participate in the appeal/court process; they are seen as medical arguments (not tax arguments)	
Constituency Offices	✓	✓				
Charities and Service Organizations	✓✓	✓				
Disability Benefit Professionals	✓✓	✓	✓	✓	✓	✓
* This includes covering the out-of-pocket fees charged by qualified medical practitioners						

Table 1 DTC Assistance Options

With these choices, the disabled and their caregivers can choose the option that best fits their needs and whose fee model suits their expectations of value and service.

It should also be noted that no other option provides the same end-to-end support as the industry.

Taxpayers are using the services of disability benefit professional firms.

Based on an analysis in 2016 of data since 2008, taxpayers are interested in, see value in, and are seeking the services of disability benefit professional firms. To the best of our ability using the data provided by firms participating in this study and published by the CRA, disability professional firms support about 15% of the DTC applications.

The following graph shows the growth in the number of cases based on data from two professional firms (a case is opened when a client inquires about the DTC and the service; it may not be pursued for a variety of reasons including the taxpayer not wishing to pursue).

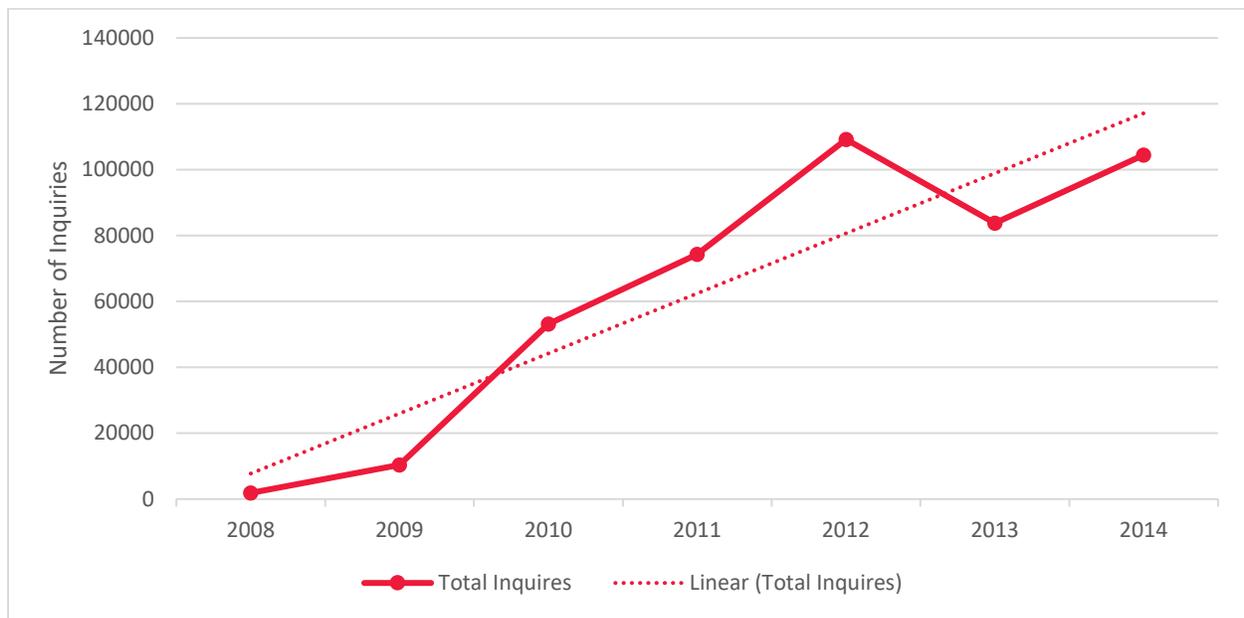


Figure 1 Annual number of Inquiries

More recent data from 2014 to 2018 from one of these firms shows that inquiries continued to grow at an annual rate of 32.23%.

Similarly, the second graph also shows (for 2010 onwards; no prior data exists) agreements signed by the client authorizing the firm to assist with their case.

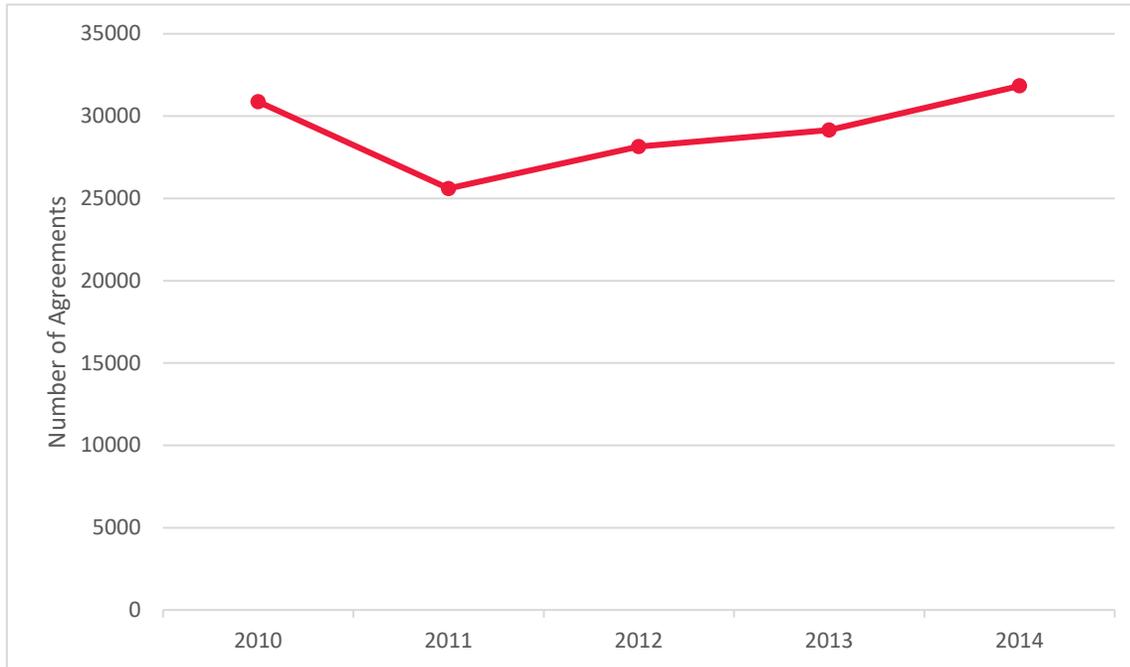


Figure 2 Annual Number of Agreements

Data from 2014 to 2018 from one of these firms shows that agreements also continued to grow at an annual rate of 32.53%.

Furthermore, referrals are a key source of new clients, which speaks to the value that clients place on the service that the professional firms offer. For one large professional firm, 39.3% of new clients say that it was a referral that led them to the firm. For another firm, the number is 45%.

Finally, a survey by the firm Leger in November 2014 commissioned by the ACDBP for internal use, found that 38% of Canadians affected by disability either first-hand or second-hand, would be willing to pay a portion of a disability compensation in exchange for assistance navigating the system.

THE DISABILITY BENEFIT PROFESSIONAL SERVICE MODEL

The disability benefit professional service model is broader than assisting a taxpayer to submit form T2201 DTC Certificate (DTC Certificate) and claiming the disability-related tax deductions on their T1 Individual Income Tax and Benefits Return.

While the detailed way in which a disability benefit professional firm operates varies, firms work with the disabled and their caregivers to secure a refund or credit for unclaimed past-year DTCs. The following figure illustrates the generic service model.

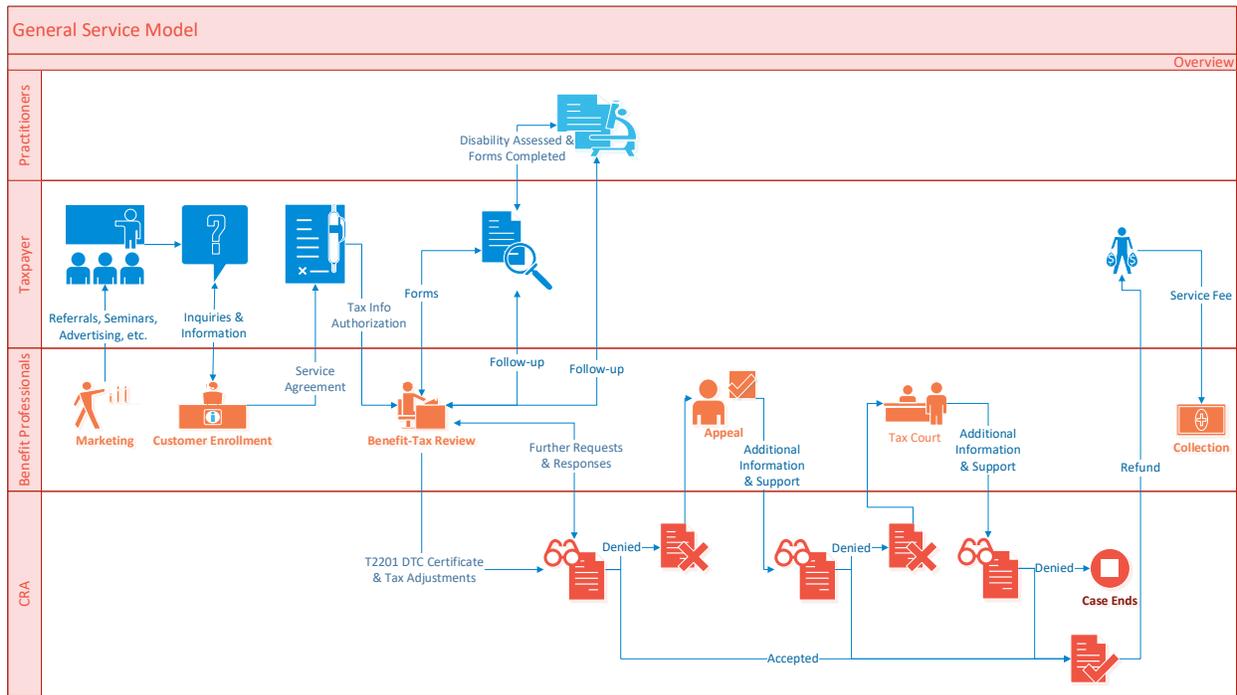


Figure 3 Disability Benefit Professional Generic Service Model

The following table describes the key functions along with the key cost drivers for each function based on the operating model the firm has chosen to pursue in the market. For example, some firms have a call centre in-house, some have outsourced their call centre. Similarly, some firms will predominately use referrals to acquire new clients; others will use online or print advertising, and others will use seminars and presentations. Some firms are located in large cities in premium locations to offer their employees and clients easily accessible offices; others will choose locations that minimize rent.

Function	Description	Cost Drivers
Marketing	Firms have a marketing function to support client acquisition. The function builds the visibility necessary to reach the estimated 60% eligible taxpayers who are not receiving the benefit. Tactics include referrals, various forms of advertising (online, print, etc.), online presence, seminars & presentations, and others.	<ul style="list-style-type: none"> • Advertising and promotion
Customer Enrollment	Firms have a front line function that responds to client inquiries and provides the caller with general information. Tactics include insourced or outsourced call centres with staff who respond to calls, answer questions, and do a very preliminary assessment as well as printing and mailroom services to send information packages and the necessary forms and agreements. Firms will follow-up with clients to ensure that they have the information they need and to collect the necessary signed forms and agreements of those who wish to engage the firm.	<ul style="list-style-type: none"> • Staff • Insourced/ outsourced call centre • Printing information kits • Postage and couriers
Benefit-Tax Review	Firms have a benefit and tax review function that reviews the past ten years of tax returns of the disabled applicant and his/her caregivers. This work includes numerous follow-ups with clients and their caregivers to ensure paperwork is complete. The benefit review includes a quality review of the T2201 form to ensure it meets CRA expectations. Tax adjustments (often in response to complicated situations) are made. The T2201 and T1 Adjustments are filed with CRA. Any response to CRA follow-up questions are handled; this often involves liaising with doctors, the disabled and their caregivers, and CRA. Once the response on eligibility is received from CRA, firms assess the response and advise clients of any options for re-filing and if necessary, appeals and Tax Court.	<ul style="list-style-type: none"> • Staff • Training • Quality assurance • Tax and other software
Collection	Once the client(s) receive their refund or credit, the firm invoices for their service and collects the fee.	<ul style="list-style-type: none"> • Staff • Payment processing fees • Collections
Administration		<ul style="list-style-type: none"> • Rent and utilities

Table 2 Key Functions and Cost Drivers

The cases can be complex requiring significant effort to work with taxpayers through the end-to-end process to receive the benefit.

Echoing the findings of the University of Calgary's report (Dunn, 2018) and the Senate report (Standing Senate Committee on Social Affairs, Science and Technology, 2018) that both named complexity of the process as a significant barrier, data provided by one ACDBP firm shows two examples of the complex work involved in handling these most complex cases from filing the DTC through to approval.

Case #544804

- Case opened Sept 2nd, 2016
- Elapsed days: 1005
- 209 logs (70 phone logs and 14 emails logs)
- Doctor signed disability from 2008
- DTC filed Dec 28th 2016
- DSQ sent by CRA January 24th 2017
- DSQ returned to CRA February 14th 2017
- DTC Declined: February 21st, 2017
- Objection filed: April 13th, 2017
- Objection Declined: October 26th, 2017
- Filed to Tax Court: Dec 20th, 2017
- Court filed Appeal to CRA: Dec 29th, 2017
- CRA Reply: March 8th, 2018
- Court date set for March 4th 2019
- Settlement date: Approved Feb 2019 for 2012-2016
- Estimate client will receive \$3,957.82

Case #49180

- Case was opened October 12th 2010
- 152 logs (59 phone logs and 7 emails logs)
- Doctor signed mental functions 2001
- DTC filed April 6th 2017
- DSQ sent by CRA N/A
- DSQ returned to CRA N/A
- DTC Declined: June 23rd 2017
- Objected: September 18th 2017
- Objection Accepted: March 6th 2018 (2015-2023)
- Filed to Tax Court: April 9th 2018
- Court filed Appeal to CRA: April 18th 2018
- CRA Reply: June 14th 2018
- Court date set for March 20th 2019
- Settlement date: March 15th 2019 (approved 2010-2014)

THE FEE STRUCTURE

The disability benefit professional firms who are members of the ACDBP subscribe to a code of conduct that includes a clause that contingency fees must not exceed 30% of the refund or credit. And there is no fee collected on future refunds or credits.

These fees do not exceed 30% of any DTC past refunds or credits. Furthermore, members do not charge upfront fees such as an application fee nor do they charge other disbursements for administrative costs with the exception of recovery of doctors' fees when paid on behalf of a client and the claim is successful. Fees are calculated only based on the refund or credit received as a result of the firm's work on past tax adjustments. There is no fee collected on future refunds or credits. Should CRA reverse a past refund or credit, members will repay the fee to the client.

Furthermore ACDBP data of surveyed members shows that there are a range of fees from 20% to 30% allowing taxpayers to chose the professional that suits their needs.

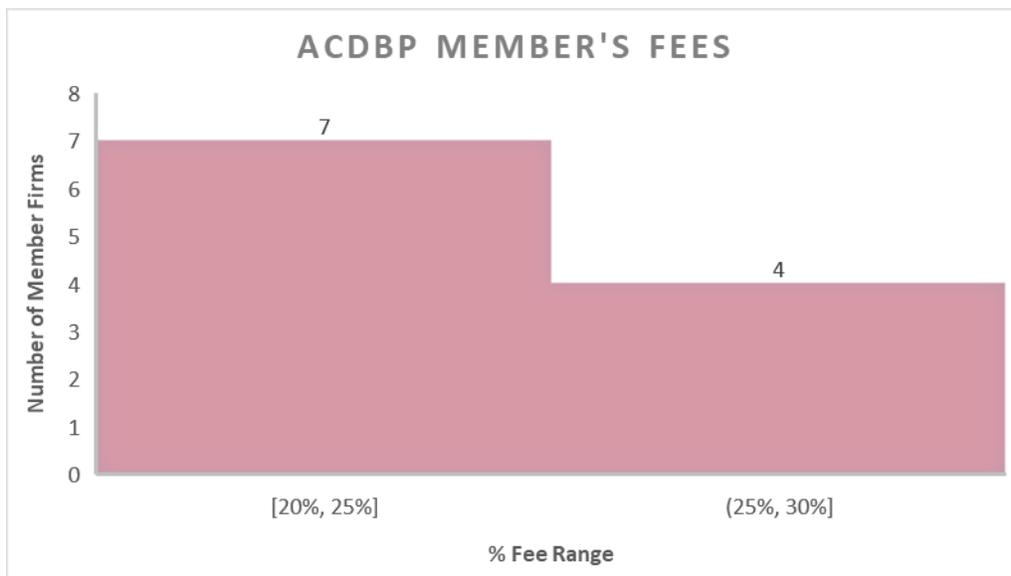


Figure 4 ACDBP Member's Fee Ranges

The disability benefit professionals industry’s contingency fee model is not dissimilar to that of other providers of advice. There is no reason to assume that it won’t continue to evolve under normal competitive market conditions.

A contingency fee structure has long existed and been accepted in the tax and accounting fields in Canada as well as in other professions in the business to consumer space - lawyers, realtors, agents and others. A fee of 30% is also common in several of these professional industries.

There is no reason to assume that the disability benefit professionals industry will not evolve as they begin to self-regulate and, through competition, differentiate their services, fee models and fees allowing the disabled and their caregivers to choose the option that best suits their needs.

The contingency fee model is simple, easy to communicate, predictable facilitates access to the credit by eligible taxpayers including incentivizing positive outcomes and improving success rates.

The following table summarizes our assessment of four common fee models including a tiered model that would have graduated percentages based on the dollar size of the refund. The shaded boxes highlight those models that best meet the assessment criteria.

Criteria	Contingency Fee	Hourly Fee Model	Fixed Flat Fee	Tiered Contingency Model
The fee structure is easy to communicate & understand with few exceptions or scenarios	Easy to communicate and understand. Aligned with commercial movement towards simple consumer pricing models. Quite simply: no refund/credit, no fee.	Easy to communicate and understand.	Easy to communicate and understand.	Difficult to communicate and understand with thresholds and variations needing to be explained. It would then be challenging to compare prices between service providers.
The fee structure leads to predictable fees at the end of the process	Predictable. The fee is predictable based on tax adjustments submitted and confirm (or is lower) when the refund or	Unpredictable. Total fees would vary based on effort. There would be no certainty of fee until the case is complete.	Easily predictable.	Predictable. The fee is predictable based on tax adjustments submitted and confirm (or is lower) when the refund or credit is

Criteria	Contingency Fee	Hourly Fee Model	Fixed Flat Fee	Tiered Contingency Model
	credit is received by the taxpayer.			received by the taxpayer.
The fee structure is proportionate to the refund or credit	Proportional to refund/credit received.	No relation of fees to the size of the refund or credit. A complex case with significant effort hours could yield a modest refund or credit.	No relation of fees to the size of the refund or credit.	Proportional to refund/credit received.
The fee structure does not act as a barrier to access service	No barriers. The contingency model allows for unobstructed access to the service by removing any up front charges or out-of-pocket expenses. The contingency fee model shares the risk associated with the uncertainty CRA's assessment of eligibility thereby encouraging eligible disabled and their caregivers to seek the DTC and the other associated benefits and credits.	Barriers. The disabled and their caregivers would have to pay for the service without knowing if CRA is going to rule their disability as eligible for the credit. This uncertainty can dissuade many eligible taxpayers from applying. The disabled and their caregivers assume the risk.	Barriers. See previous	No barriers.
The fee structure provides an opportunity for bad behaviour	Incentivizes good behaviour. The contingency fee model incentivizes professionals to work on legitimate cases and weed out weak or fraudulent cases. Regardless of the fee model, CRA determines eligibility for the credit; and the tax law provides corrective action for those that do commit fraud.	May incentivize bad behaviour. May inadvertently incentivize bad behaviour by encouraging providers to take any and all claims - including weak or fraudulent cases.	May incentivize bad behaviour. See previous	Incentivizes good behaviour.
The fee structure incentivizes positive outcomes and improves success rates	Positive. A contingency fee encourages firms to work hard and advocate for the disabled and their caregivers and minimizes the instances when rightful cases are abandoned during the eligibility and	Positive & Negative. An hourly fee encourages firms to work hard. However, the fee itself would increase proportional to the work.	Neutral. No incentive to work on complex cases.	Neutral. May result in unintended behaviour. For example, firms may turn down eligible cases seeking only cases with a high

Criteria	Contingency Fee	Hourly Fee Model	Fixed Flat Fee	Tiered Contingency Model
	reassessment process or appeal. Regardless of the amount of work, the fee is the same.			expected refund or credit. For example, firms may not work for the maximum refund or credit; instead they may work for the “easiest” amount and not expend the effort required to get the maximum amount (given it can be for fewer dollars).
The fee structure incents on-going value to community	Positive. Firms are motivated to educate the disabled and caregiver community of the DTC. The fee model only applies to past taxes; all future benefit accrues to the taxpayer including future access to other tax credits and programs.	Positive.	Positive.	Positive.

Table 3 Fee Model Comparison

Furthermore, the same Leger study from November 2014 found that 75% of respondents, when forced to choose between two possible payment methods, would chose a contingency payment fee based on the success of the claim over an upfront set fee.

Setting a fee maximum different than the current contingency fee model and percentage naturally established by the industry may limit access to the service.

A fee model or contingency fee percentage is set without reflecting what naturally evolved in industry will impact the services provided by the industry. For example, if the contingency fee is reduced, the higher the refund or credit must be to cover expenses. This may have the effect of causing firms to serve only clients whose refunds or credits are high enough to cover expenses or the cases that are easy and take the least amount of time and effort to assist. In turn, this would limit access for those disabled and their caregivers whose refunds or credits are less or whose cases are more complicated denying them their right to receive entitlements and access to their choice of professional service. Furthermore, if they were

unable to secure their disability certificate through other means, they would not only lose the refund or credit associated with past eligible credits, but would also not be eligible for future refunds or credits or other types of credits such as the RDSP.

Fee maximums and models should allow disability benefit professional firms the operating flexibility to differentiate their service models and maintain industry competition.

Fee maximums and models should be sufficient to incent firms to differentiate their service models and maintain industry competition to allow taxpayers the choice of service and value.

Our review of the industry uncovered a wide variety of operating models from large scale operations investing staff and technology to support a high quality, high service model to small scale operations with few staff and limited technology. The fee maximum should allow for variations in operating models and investment so that firms can continue to distinguish themselves, compete with each other, and offer choice to the to the disabled and their caregivers when seeking advice.

CONCLUSIONS

The disability benefit professionals industry provides a critical service to the 60% of eligible taxpayers not claiming the DTC working with the disability and their caregivers from the beginning of the complex process until resolution. Many taxpayers have chosen the services of these firms. These professional firms are one of many options the disabled and their caregivers have to claim the DTC allowing them to chose the service and fee model/fee that best suits their needs.

The disability benefit professionals industry has formed an association to ensure that practices are self-regulated and that their dealings with clients are ethical sensitive and transparent. There is no reason to expect that the disability benefit professionals industry won't continue to evolve as competition between firms continues resulting in further differentiation of service, value, and fees.

We recommend that careful consideration be given to regulatory changes away from the contingency model and the 30% maximum that has developed under the competitive market conditions, reflect the nature and costs of the services, and is similar to other professional industries. The fee model and the maximum fee allows professionals to invest in end-to-end services and build business models that fosters competition between firms and encourages the provision of the service to eligible taxpayers with modest estimated refunds or credits or complex claims and tax situations.

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APPENDIX A: PARTICIPANTS IN THE STUDY

Participants - DTC Professionals

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Over 30 years of specialized medical tax expertise

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Participants - Third Parties

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