

The Canadian National Institute for the Blind

**Submission to the Advisory Committee on Tax Measures for
Persons with Disabilities**

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INTRODUCTION

The Canadian National Institute for the Blind (CNIB) is pleased to participate in the on-going consultation process of the Committee.

The CNIB assists over 107,000 blind, vision-impaired and deafblind Canadians in becoming or remaining full participants in all aspects of Canadian society. Our mandate, as established when incorporated in 1918, is to ameliorate the condition of the blind of Canada; to prevent blindness; and to promote sight enhancement services. In speaking of "blindness" and "vision impairment", we include both those who are functionally blind, and those who are experiencing a level of vision loss that causes difficulty with daily living activities.

The CNIB provides seven core services:

- < Counselling and Referral**
- < Rehabilitation Teaching**
- < Orientation and Mobility Instruction**
- < Sight Enhancement**
- < Technical Aids**
- < Career Development and Employment**
- < Library Services**

We work in partnership with voluntary, government, and private sectors to achieve our goals, and are pleased to have the opportunity to submit this brief to the Standing Committee on Finance. The CNIB is encouraged by the heightened understanding of the needs and issues of blind and vision impaired Canadians by government agencies and departments like the CCRA and the Department of Finance.

BACKGROUND

The Disability Tax Credit (DTC) originated during the Second World War as a \$480 deduction from taxable income for persons who were totally blind and did not claim an amount for attendant care under the medical expense deduction. This provision was intended to recognize undocumented, non-discretionary costs that blind persons usually incur and to help compensate unpaid family members providing assistance and transportation.

Today, the DTC has evolved to become a non-refundable, fixed credit against basic federal personal income tax that is available to a much larger population of persons with a full range of severe disabilities. It is intended to help offset their disability-related costs. Applicants must have a qualified professional complete a DTC certificate (form T2201) to be considered for the credit. Trained CCRA staff then review this certificate and make the final decision on eligibility.

AGING POPULATION

According to the National Action Coalition on Aging Report "1999 and Beyond", for most seniors, Canada is a good place to grow older. Canadian seniors live longer and in better health than seniors in many other countries. The aging of the population is here to stay. With people living longer and families having proportionately fewer children, the seniors' portion of the population is expected increase for the foreseeable future. ¹

One of the impacts of aging on our society and Canadian seniors will be the decrease in visual function associated with eye conditions common in aging. Presbyopia affects everyone sometime after the age of 40. As the eye ages, the lens becomes less flexible and can no longer easily focus on near objects or small print, however, this can be accommodated with glasses or contact lenses. Serious visual impairment is a result of major eye diseases that tend to affect people later in life. Visual impairments that occur among older adults include: macular degeneration, glaucoma, diabetic retinopathy and cataracts.

EFFECT ON READING AND WRITING TASKS

A factor for many Canadian seniors is that they are concurrently experiencing vision difficulties and other impairments such as mobility.

While vision loss has an obvious impact on personal mobility and driving; one of the greatest effects is the decreased ability to read and write. Reading bills and financial reports, leisure or work related material, letters, recipes, prices, newspapers are all everyday reading needs that can become difficult or impossible to perform. Likewise, jotting notes, writing cheques and letters, word processing, writing email or other documents becomes difficult to see, edit and review.

CURRENT POLICY

At present low visioned Canadians are eligible to apply for DTC under the following criteria:

“You are blind all or almost all of the time, even with the use of corrective lenses or medication, and the impairment is prolonged... This means visual acuity in both eyes with proper refractive lenses is 20/200 (6/60) or less with the Snellen Chart or an equivalent, or when the greatest diameter of the field of vision in both eyes is 20 degrees or less.”

WHAT ABOUT THOSE WITH A VISUAL ACUITY OF 20/70 OR LESS ?

Although it is a progressive tax measure that Canadians with a visual acuity in both eyes with proper refractive lenses of 20/200 (6/60) or less are eligible for the DTC, the CNIB feels that another group that falls outside this category is equally deserving of financial relief through a disability tax credit. We are referring to

those whose eyesight is impaired and visual acuity is 20/70 or less.

CNIB is very concerned about this group of low-visioned Canadians. They or their families are also incurring undocumented, non-discretionary costs directly related to their visual impairment.

With a visual acuity of 20/70 or less, a person is unable to drive, or read print without specific conditions of good lighting. Even reading clear print becomes problematic.

The recommendation to include Canadians whose eyesight is impaired and visual acuity is 20/70 or less is based on individual cases documented within the case management system of the CNIB. This information as it exists, does not provide quantitative evidence of the economic impact of vision impairment for persons with visual acuity between 20/70 and 20/200.

RECOMMENDATIONS

Therefore CNIB recommends to the Committee, the following:

- 1. That the eligibility criteria for the Disability Tax Credit be expanded to include persons with visual acuity of 20/70 or less.**
- 2. That research be conducted to determine the numbers of Canadians affected by a visual acuity of 20/70 and less, the demographic characteristics of these people, and the negative financial impact this level of visual impairment causes.**
- 3. That the Technical Advisory Committee on Tax Measures for Persons With Disabilities funds this research. Ideally the research would be conducted by a coalition made up of the Canadian Optometrists**

Association, The Canadian Ophthalmologic Society and the CNIB.

CONCLUSION

In conclusion we believe that, if acted upon, the above recommendations will enhance the criteria and methods used to establish eligibility for the disability tax credit for persons with disabilities. The proposed changes will contribute to a more inclusive Canadian society, where Canadians who are blind or vision impaired may enjoy optimum quality of life.

In drafting these suggestions, we have focused on the goal of enhancing the independence and quality of life for persons who are blind and vision-impaired, such that they are able to function as full and contributing members of society. We know that both your committee and the government shares our vision of a society in which people with disabilities, including those who are blind or vision-impaired, cannot only survive, but can thrive. The CNIB looks forward to working with this Committee and all levels of government to achieve these shared goals.

Thank you.

¹ Health Canada document: Highlights 1999 and Beyond: Challenges of an Aging Society. Retrieved from the World Wide Web:
http://www.hc-sc.gc.ca/seniors-aines/pubs/beyond1999/trends_e.htm

² Health Canada document: Barriers to Seniors' Autonomy: Sensory Loss-Vision. Retrieved from the World Wide Web:
<http://www.hc-sc.gc.ca/seniors-aines/pubs/vignette/vige86.htm#86>