Dear Member,

We are excited to share a few significant updates regarding your most pressing questions on tax free therapy for regulated titles and Canadian Certified Counsellors. Please review the information carefully.

GST Exemption Confirmed for CCCs in Unregulated Provinces

The Canada Revenue Agency (CRA) has officially confirmed that Certified Canadian Counsellors (in good standing) are exempt from collecting GST/HST on their counselling therapy and psychotherapy services in provinces where the profession is not regulated.

The CRA's confirmation states:

"The information in the letter can be used by members of your association who hold the CCC designation to confirm that they are practitioners for GST/HST purposes, in respect of supplies of counselling therapy and psychotherapy services made in provinces that do not regulate the profession of counselling therapy and psychotherapy."

Key Highlights from the CRA Confirmation

- The CRA has accepted the letter provided by the College of Counselling Therapists of New Brunswick (CCTNB) and the College of Registered Psychotherapists of Ontario (CRPO), confirming that CCCs meet substantial equivalency standards for GST/HST exemption purposes when compared to Licensed Counselling Therapists in New Brunswick and Registered Psychotherapists in Ontario.
- 2. CCCs can now rely on this recognition to confirm their status as practitioners exempt from GST/HST when providing psychotherapy services in unregulated provinces.
- 3. The CCPA is committed to ensuring that our members maintain ongoing recognition of equivalency for tax purposes.
- 4. If there are future changes to the CCC or regulatory college requirements, the CCPA will obtain updated confirmation from CRPO and CCTNB.
- 5. The CCPA maintains a public registry of qualified CCC members accessible to the CRA, listed as our CCC Directory on the CCPA website.

What This Means for CCCs

Effective immediately, Certified Canadian Counsellors are no longer required to collect GST/HST on psychotherapy services in provinces without psychotherapy regulation.

Tax exemption for CCCs is back dated to June 20, 2024 to align with the exemption for regulated Counselling Therapists and Psychotherapists. Any tax charged after this date will need to be returned to the client. Please see below for details.

Next Steps for CCCs

- 1. **Cease Collecting GST:** As of today, stop collecting GST on exempt psychotherapy and supervision services.
- 2. **Review Your GST Account:** If you provide other taxable services, like training, retain your GST account but adjust your billing practices accordingly.
- 3. **Inform Your Clients:** Update your clients about this change in billing for counselling therapy and psychotherapy services.
- 4. Renew Your Membership for 2025: This exemption applies specifically to Canadian Certified Counsellors only (ie professional members who hold the CCC designation). Professional Members in unregulated provinces who do not hold the CCC designation are not exempt unless they hold a title from a regulatory body.

Tax Free Therapy Updates for all Practitioners

Remittance of Tax Charged to clients from June 20, 2024 to Present

There are two options to address charging tax on treatment services after June 20, 2024. The two options are:

- Repay all tax to clients
- Clients may request a repayment of the tax from CRA directly.

See Paragraphs 27-29 of Refund, Adjustment, or Credit of the GST/HST under Section 232 of the Excise Tax Act - Canada.ca

Proof of Professional Title to CRA

This includes Registered Psychotherapists, Registered Counselling Therapists, Licensed Counselling Therapists and Canadian Certified Counsellors.

CCPA Professional Members who do not hold the CCC designation are NOT included in tax exemption (unless they hold a regulated title).

CRA has confirmed that practitioners are NOT required to prove their professional title to the CRA directly or during the process of filing taxes. The CRA will verify each practitioner's status through the CCPA CCC Directory and the directories of the regulatory colleges.

Input Tax Credits

Practitioners are no longer able to claim input tax credits as of June 20, 2024.

The CRA has previously supported Naturopathic Doctor's with info on this process. They will be creating a similar resource for our profession. In the meantime, CRA has confirmed that members can reference the following document for the same application to changes of claiming input tax credits.

Application of the GST/HST to the Practice of Naturopathic Doctors - Canada.ca

Looking Ahead

The CRA has confirmed they will be publishing a new document on frequently asked questions to provide further clarification on these changes in February 2025. This document is informed by the survey feedback received from 270 CCPA members.

Member Webinar

We will be organizing a webinar in collaboration with the CRA and Chartered Professional Accountants of Canada to review this information in the coming weeks. Please stay tuned for additional information.

CCPA's Role

The CCPA remains dedicated to upholding the high standards of the counselling profession that have earned this recognition. To support our members, we will:

- Continue collaborating with CCTNB and CRPO to maintain substantial equivalency for tax purposes.
- Ensure our CCC Directory is kept current for CRA access.

This accomplishment reflects the CCPA's advocacy efforts over the past year to secure this important exemption for our members.

We are deeply grateful for CCTNB and CRPO's partnerships and expertise in helping achieve this milestone, as well as for your patience and understanding as we worked through the complexities of this issue.

CCPA Disclaimer

It is the responsibility of each practitioner and business owner to be aware of the laws relating to their business and make decisions accordingly. Please note that CCPA does not provide any tax advice. If you have questions relating to your specific circumstances, please reach out to CRA directly.

Sincerely,

CCPA Head Office