

# The Corporate Transparency Act: *Reporting Considerations for Health Care Entities*

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- **Section II.** The CTA Reporting Requirements.
- **Section III.** Updating and Maintaining Accurate Reports.
- **Section IV.** Key Considerations for Health Care Entities.
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***Section I. Overview of the Corporate  
Transparency Act.***

# Overview of the Corporate Transparency Act (“CTA”)

- Starting January 1, 2024, many privately-owned entities are subject to ongoing disclosure and reporting obligations required by the CTA.
- The goal of the CTA is to strengthen national security and the integrity of the U.S. financial system by making it more difficult for illicit actors to use shell companies for money laundering, terrorism, tax evasion, and other financial crimes.
- The CTA mandates the creation of the Beneficial Ownership Secure System (“BOSS”) database and requires entities to disclose information regarding beneficial ownership.
- On September 30, 2022, the U.S. Treasury Department’s Financial Crimes Enforcement Network (“FinCEN”) issued the final rule outlining the CTA’s reporting requirements. The final rule is estimated to affect over 32 million entities by mandating reports of Beneficial Owners.

Penalties for failure to comply with the CTA’s reporting requirements are severe, and include civil penalties of \$591 per day, criminal fines of up to \$10,000, and up to two years imprisonment.

# The Elephant in the Room

***On March 1, 2024, U.S. District Court Judge Liles C. Burke ruled that the CTA is unconstitutional and permanently enjoined the government from enforcing the CTA against the plaintiff.***

The court found that the CTA exceeds the Constitution's limits on the legislative branch and lacks a sufficient nexus to any enumerated power to be a necessary or proper means of achieving Congress' policy goals.

Despite the decision, the opinion makes it clear that ***it is only applicable to the Plaintiffs***. Therefore, entities throughout the United States that fail to qualify for an exemption are ***still required to comply with the CTA's reporting obligations***.

Treasury Department officials appealed the judgment to the Eleventh Circuit Court of Appeals on March 11, 2024. Additionally, the opinion issued by Judge Burke provides a blueprint for amending the CTA to comply with the Constitution.

# The Small Entity Compliance Guide

**FinCEN published the Small Entity Compliance Guide to help small entities comply with the reporting requirements under the Corporate Transparency Act. The Guide includes helpful decision trees and exemption summaries.**

**Small Entity Compliance Guide**

**BOI**  
Beneficial Ownership Information Reporting Requirements

Financial Crimes Enforcement Network  
U.S. Department of the Treasury  
Version 1.1 December 2023

**What does this Guide include?**

There are six key questions to help you comply with the Reporting Rule. This Guide includes a chapter for each key question, listed below. This Guide includes interactive flowcharts, checklists, and other aids to help you determine whether your company needs to file a BOI report with FinCEN, and if so, how to comply with the reporting requirements. This Guide will be updated periodically with new or revised information.

- 01** Does my company have to report its beneficial owners?  
Click here to go to Chapter 1
- 02** Who is a beneficial owner of my company?  
Click here to go to Chapter 2
- 03** Does my company have to report its company applicants?  
Click here to go to Chapter 3
- 04** What specific information does my company need to report?  
Click here to go to Chapter 4
- 05** When and how should my company file its initial report?  
Click here to go to Chapter 5
- 06** What if there are changes to or inaccuracies in reported information?  
Click here to go to Chapter 6

Beneficial Ownership Information Reporting Requirements  
Small Entity Compliance Guide, December 2023 - Version 1.1

**Large operating company (Exemption #21)**

An entity qualifies for this exemption if all six of the following criteria apply:

1. The entity employs more than 20 full-time employees, when applying the meaning of full-time employee provided in 26 CFR 54.499011-1(a) and 54.499011-3. In general, "full-time employee" means, with respect to a calendar month, an employee who is employed an average of at least 30 hours of service per week with an employer.	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. More than 20 full-time employees of the entity are employed in the "United States," as that term is defined in 21 CFR 1010.1093(a).	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. The entity has an operating presence at a physical office within the United States. "Operating presence at a physical office within the United States" means that an entity regularly conducts its business at a physical location in the United States that the entity owns or leases and that is physically distinct from the place of business of any other unaffiliated entity.	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. The entity filed a Federal income tax or information return in the United States for the previous year demonstrating more than \$5,000,000 in gross receipts or sales. If the entity is part of an affiliated group of corporations within the meaning of 26 U.S.C. 1361, refer to the consolidated return for such group.	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. The entity reported this greater-than-\$5,000,000 amount as gross receipts or sales (net of returns and allowances) on the entity's IRS Form 1120, consolidated IRS Form 1120, IRS Form 1120-S, IRS Form 1065, or other applicable IRS form.	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. When gross receipts or sales from sources outside the United States, as determined under Federal income tax principle, are excluded from the entity's amount of gross receipts or sales, the amount remains greater than \$5,000,000.	<input type="checkbox"/> Yes <input type="checkbox"/> No

Beneficial Ownership Information Reporting Requirements  
Small Entity Compliance Guide, December 2023 - Version 1.1

**2.2 What is ownership interest?**

Reporting companies are required to identify all individuals who own or control at least 25 percent of the **ownership interests** of the company. Any of the following may be an ownership interest: equity, stock, or voting rights; a capital or profit interest; convertible instruments; options or other non-binding privileges to buy or sell any of the foregoing; and any other instrument, contract, or other mechanism used to establish ownership. A reporting company may have multiple types of ownership interests. The following chart identifies the ownership interest types and provides examples.

**Chart 4 – Ownership interests**

**EQUITY, STOCK, OR VOTING RIGHTS**  
any interest classified as stock or anything similar, regardless whether it confers voting power or voting rights, and even if the interest is transferable.  
**EXAMPLES** include:  
• equity, stock, or similar instrument  
• preorganization certificate or subscription  
• transferable share of, or voting trust certificate or certificate of deposit for, an equity security, interest in a joint venture, or certificate of interest in a business trust

**CAPITAL OR PROFIT INTEREST**  
any interest in the assets or profits of a company organized as an LLC, which is similar to stock in a corporation and sometimes referred to as a "unit"

**CONVERTIBLE INSTRUMENTS**  
any instrument convertible into equity, stock, or voting rights or capital or profit interest, whether or not anything needs to be paid to exercise the conversion. The RELATED items are also ownership interests:  
• any future on any convertible instrument  
• any warrant or right to purchase, sell, or subscribe to a share or interest in equity, stock, or voting rights or capital or profit interest, even if such warrant or right is a debt

**OPTION OR PRIVILEGE**  
any put, call, straddle, or other option or privilege of buying or selling equity, stock, or voting rights, capital or profit interest, or convertible instruments, EXCEPT if the option or privilege is created and held by others without the knowledge or involvement of the reporting company

**CATCH-ALL**  
any other instrument, contract, arrangement, understanding, relationship, or mechanism used to establish ownership

Beneficial Ownership Information Reporting Requirements  
Small Entity Compliance Guide, December 2023 - Version 1.1





***Section II. The CTA Reporting Requirements.***

# The CTA Reporting Requirements – Timeline

***Any entity that is created by filing with a Secretary of State or any similar office under the law of a State or Indian Tribe is deemed a “Reporting Company” subject to the CTA. The CTA impacts almost all closely held entities that fail to qualify for a codified exemption.***

## Reporting Company Registered Pre-Enactment:

Any Reporting Company registered before January 1, 2024, must file an initial report with FinCEN by **January 1, 2025**.

## Reporting Company Registered Post-Enactment:

Any Reporting Company registered after January 1, 2024, must file an initial report **90 days** after its creation or registration. This 90-day deadline runs from the time the Reporting Company receives actual notice that its creation or registration is effective, or after a Secretary of State first provides public notice of its creation or registration, whichever is earlier.

The information reported is not publicly available but will be accessible by certain government agencies including the Centers for Medicare and Medicaid Services.



# What Information Must be Reported?

***The following information must be reported for each entity or individual that meets the definition of Reporting Company, Beneficial Owner, or Company Applicant:***

- The Reporting Company information that must be reported includes:
  - Legal name and trade names;
  - Street address for the entity's principal place of business;
  - State of formation;
  - Tax Identification Number; and
  - An identifying document from an issuing jurisdiction and an image of that document.
- The Beneficial Owner and Company Applicant information that must be reported includes:
  - Full legal name;
  - Date of birth;
  - Residential address; and
  - PDF of the individual's U.S. passport or state driver's license.

If Beneficial Owners or Company Applicants have concerns about repeatedly providing personal information within the Reporting Company's report, the final rule outlines a process for obtaining a FinCEN identifier number.

**FAQ:** I own an existing entity organized in State A. Do I need to file a CTA report within 90 days of registering as a foreign entity doing business in State B?

***No. Reporting companies created or registered to business before January 1, 2024, will have additional time—until January 1, 2025—to file their initial CTA reports. Only companies created or registered on or after January 1, 2024, and before January 1, 2025, have 90 calendar days after receiving actual or public notice that their company’s creation or registration is effective to file their initial CTA reports.***

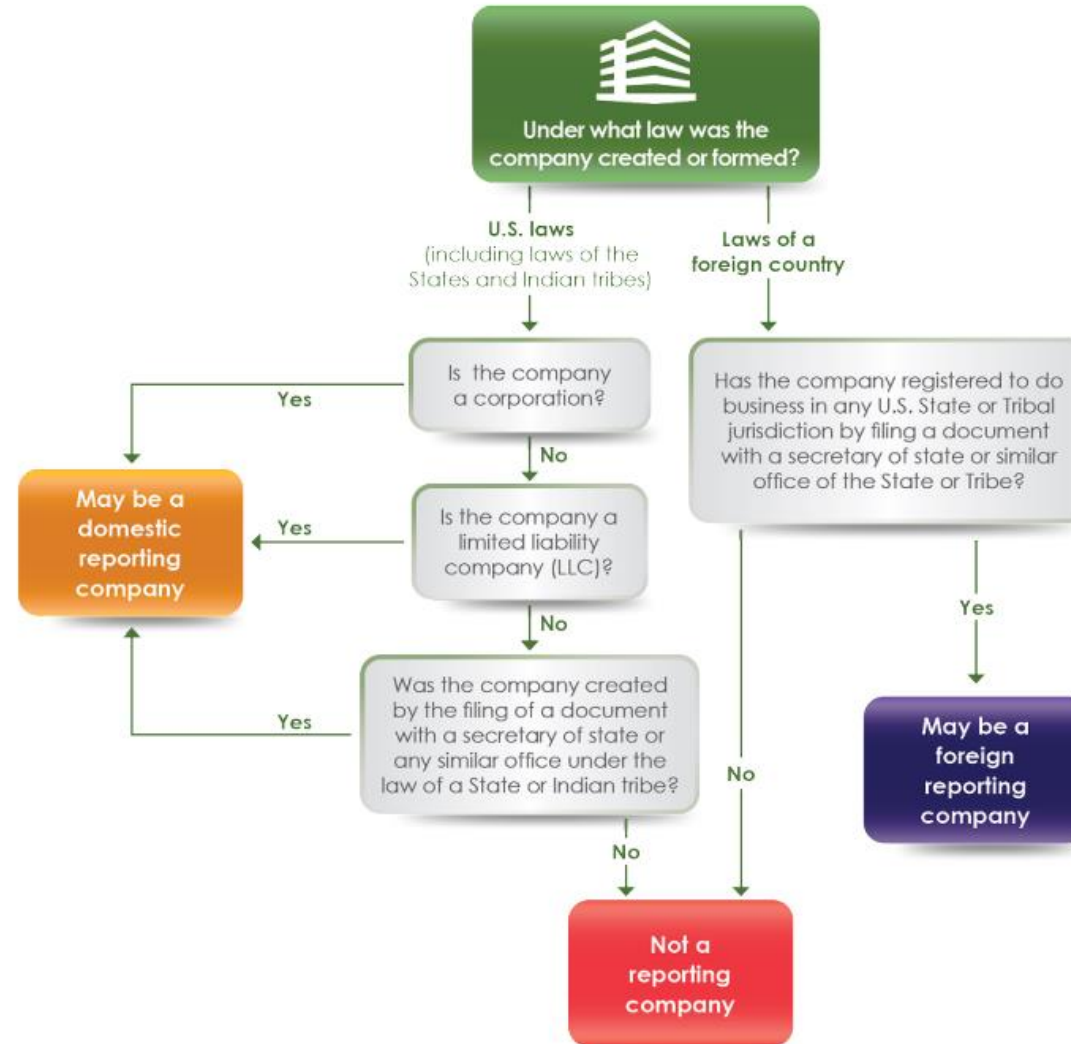
# What is a Reporting Company?

***The definition of “Reporting Company” is broad and includes any entity that is created by filing with a Secretary of State or any similar office under the law of a State or Indian Tribe.***

***In contrast, if an entity does not meet the definition of “Reporting Company” or qualifies for an exemption, it is not required to file a CTA report with FinCEN.***

Despite the broad definition of Reporting Company, the CTA contains 23 codified exemptions for entity’s that already have significant government reporting requirements.

# What is a Reporting Company?



# What is a Reporting Company?

***There are 23 codified exemptions to the CTA's reporting requirements. The exemptions are listed below:***

1. Securities Reporting Issuer
2. Governmental Authority
3. Bank
4. Credit Union
5. Depository Institution Holding Company
6. Money Services Business
7. Broker or Dealer in Securities
8. Securities Exchange or Clearing Agency
9. Other Exchange Act Registered Entity
10. Investment Company or Advisor
11. Venture Capital Fund Adviser
12. Insurance Company
13. State-Licensed Insurance Producer
14. Commodity Exchange Act Registered Entity
15. Accounting Firm
16. Public Utility
17. Financial Market Utility
18. Pooled Investment Vehicle
- 19. Tax-Exempt Entity***
20. Entity Assisting a Tax-Exempt Entity
- 21. Large Operating Company***
- 22. Subsidiary of Certain Exempt Entities***
- 23. Inactive Entity***

# What is a Beneficial Owner?

***In addition to providing information about the Reporting Company, the CTA also requires information to be reported regarding any individual who is a “Beneficial Owner.” There are two ways that an individual could qualify as a Beneficial Owner:***

## Exercising Substantial Control:

A Beneficial Owner is generally anyone that exercises substantial control over the Reporting Company. There are 4 tests to determine “substantial control.”

- Senior Officer;
- Appointment or Removal Authority;
- Important Decision-Maker; and
- Catch-All.

## Owning 25% of the Ownership Interests:

A Beneficial Owner is generally anyone that owns or controls at least 25% of the ownership interests of the Reporting Company.

Any of the following may be an ownership interest: equity, stock, or voting rights, a capital or profit interest, convertible instruments, options or other non-binding privileges to buy or sell any of the foregoing, and any other instrument, contract, or other mechanism used to establish ownership.

# Substantial Control – Senior Officer

Under the Substantial Control test, a Beneficial Owner includes *any individual* holding the position or exercising the authority of a:

- President;
- Chief Financial Officer;
- General Counsel;
- Chief Executive Officer;
- Chief Operating Officer; or
- Any other officer, regardless of official title, who performs a similar function to these officers.



# Substantial Control – Appointment or Removal Authority

Under the Substantial Control test, a Beneficial Owner includes *any individual* with the ability to appoint or remove any Senior Officer or a majority of the board of directors or similar body.

# Substantial Control – Important Decision Maker

Under the Substantial Control test, a Beneficial Owner includes **any individual** who directs, determines, or has substantial influence over important decisions made by the Reporting Company, including the following:

- **Business**, such as:
  - Nature, scope, and attributes of the business.
  - The selection or termination of business lines or ventures, or geographic focus.
  - The entry into or termination, or the fulfillment or non-fulfillment, of significant contracts.
- **Finances**, such as:
  - Sale, lease, mortgage, or other transfer of any principal assets.
  - Major expenditures or investments, issuances of any equity, incurrence of any debt, or approval of operating budget.
  - Compensation schemes and incentive programs for senior officers.
- **Structure**, such as:
  - Reorganization, dissolution, or merger.
  - Amendments to any substantial governance documents of the Reporting Company.

# Substantial Control – Catch-All

Finally, under the Substantial Control test, a Beneficial Owner includes **any individual** who exercises any other form of substantial control over the reporting company. For example, flexible corporate structures may have different indicators of control.

The Catch-All test is extremely broad and a main criticism of the recent opinion out of the 11<sup>th</sup> Circuit.

Despite the ambiguity, FinCEN did publish a helpful checklist within the Small Entity Compliance Guide to assist in identifying Beneficial Owners.

Substantial control question:	Answer	If response is "Yes":
1. Does your company have a president, chief financial officer, general counsel, chief executive officer, or chief operating officer?	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are <b>senior officers</b> in your company.
2. Does your company have any other officers that perform functions similar to those of a President, chief financial officer, general counsel, chief executive officer, or chief operating officer? <i>Note:</i> One individual may perform one or more functions for a company, or a company may not have an individual who performs any of these functions.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
3. Does your company have a board of directors or similar body AND does any individual have the ability to appoint or remove a majority of that board or body?	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are individuals with <b>appointment or removal authority</b> over your company.
4. Does any individual have the ability to appoint or remove a senior officer of your company?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5. Does any individual direct, determine, or have substantial influence over important decisions made by your company, including decisions regarding your company's business, finances, or structure? <i>Note:</i> Certain employees who might fit this description are nevertheless exempt from the beneficial owner definition. See <a href="#">section 2.4</a> for more information.	<input type="checkbox"/> Yes <input type="checkbox"/> No	There are <b>important decision-makers</b> over your company.
6. Are there any other individuals who have substantial control over your company in ways other than those identified in 1-5 above?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

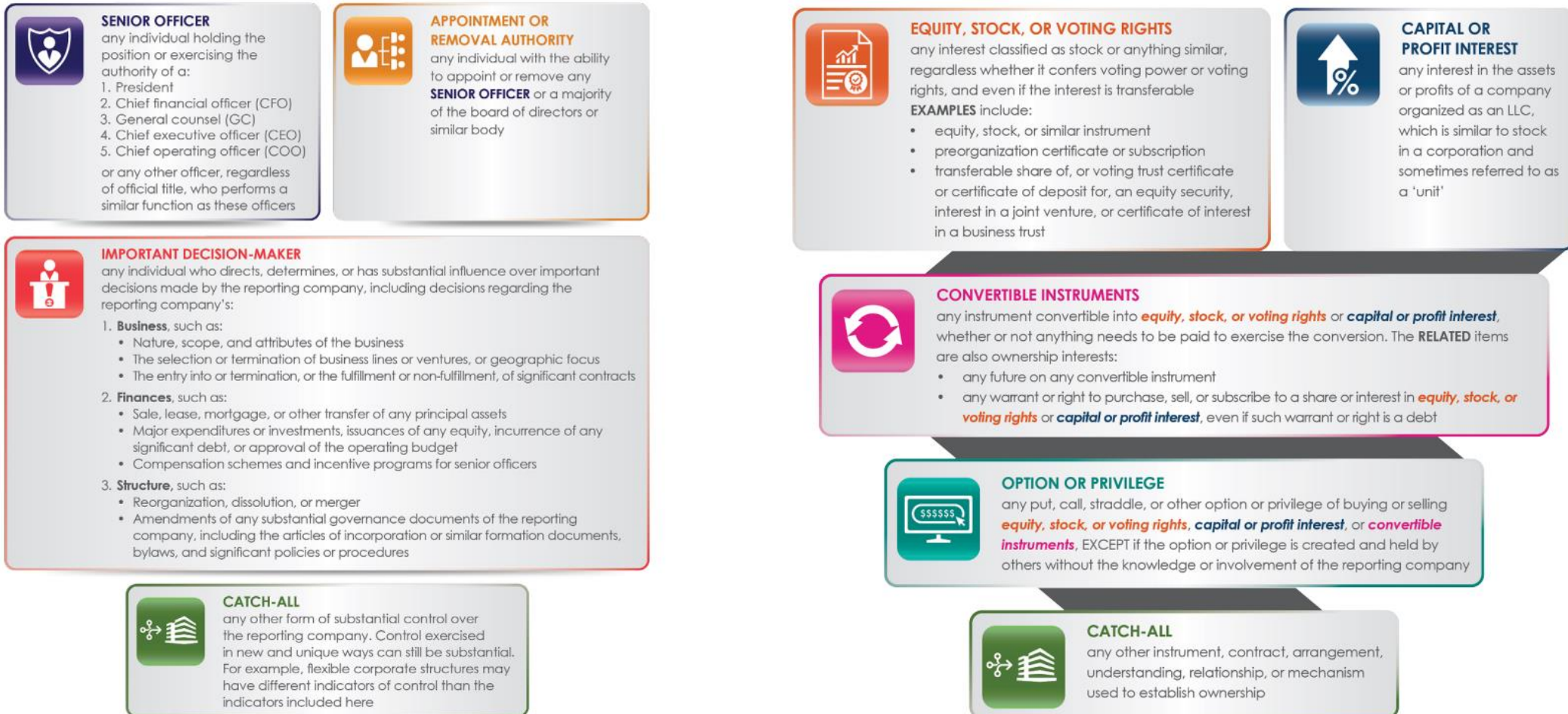
## FAQ: Do I need to report every member of my Board of Directors as a Beneficial Owner?

***Not necessarily. Whether or not a member of the Board of Directors qualifies as a Beneficial Owner is fact sensitive. For instance, a Board of Directors comprised of 25 individuals is unlikely to result in substantial control. In contrast, a Board of Directors comprised of 3 individuals is more likely to result in substantial control. Nonetheless, at this time, FinCEN has not published guidance stating that all members of a Board of Directors are considered a Beneficial Owner.***

**FAQ:** My entity is managed by 3 individuals. However, we do not use titles such as President, CEO, or COO. Who is considered a Beneficial Owner?

***In this scenario, we recommend reporting all 3 individuals as Beneficial Owners. Based on the broad definitions of “Substantial Control,” it is likely that all 3 individuals meet one of the four tests discussed previously.***

# What is a Beneficial Owner?



# What is a Company Applicant?

***In addition to providing information about the Beneficial Owners, Reporting Companies created on or after January 1, 2024, will also have to provide information regarding the “Company Applicant.” There are two categories of Company Applicant:***

## Category 1 – The Direct Filer:

This is the individual who directly filed the document that created the Reporting Company. In other words, this is the individual who would have physically or electronically filed the document with the secretary of state or similar office.

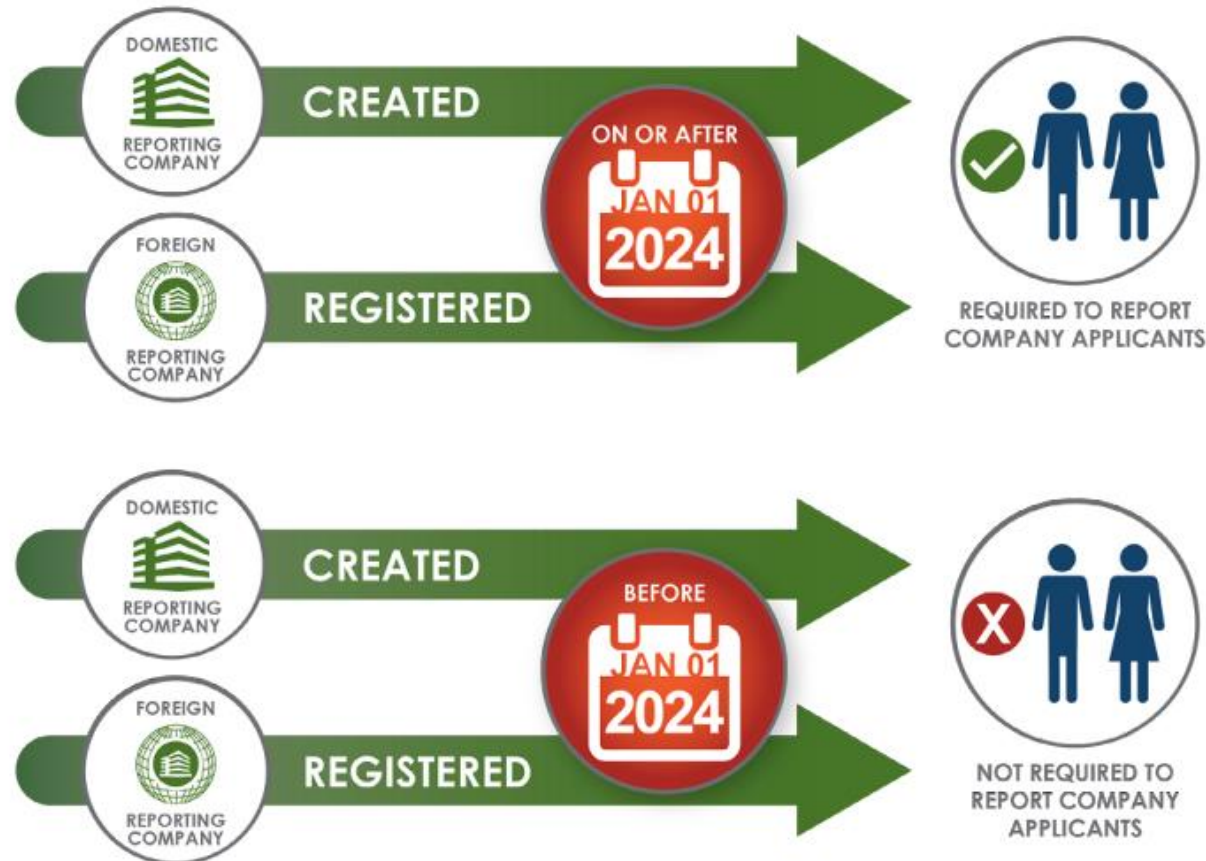
## Category 2 – Directs or Controls the Filing:

The other possible Company Applicant is the individual who was primarily responsible for directing or controlling the filing of the first registration document. This individual is a Company Applicant even though the individual did not actually file the document with the secretary of state or similar office.

FinCEN has clearly indicated that each Reporting Company formed after January 1, 2024, must identify at least 1 Company Applicant, and at most 2.



# What is a Company Applicant?



## FAQ: How long does it take to file an initial CTA report?

***The process is straightforward and user-friendly. For example, it takes roughly 10-minutes to file an initial CTA report. The largest time commitment is gathering all the required information and performing the analysis to determine whether or not the entity is required to report under the CTA.***

## FAQ: Do I need to file a CTA report annually?

***No. CTA reports do not need to be reported annually. However, as we will now discuss, CTA reports must be updated following any changes or known inaccuracies.***



***Section III. Updating and Maintaining  
Accurate Reports.***

# Updating and Maintaining Accurate Reports

***While there is no annual filing requirement, all Reporting Companies must report changes or known inaccuracies to any filing within **30 days** of the change or knowledge of the inaccuracy.***

- The following are non-exhaustive examples of changes that would require an updated report:
  - Any change to the information reported for the Reporting Company, such as registering a new d/b/a.
  - A change in Beneficial Owners, such as a new Chief Executive Officer, a sale that changes who meets the ownership interest threshold of 25%, or the death of a Beneficial Owner.
  - Any change to a Beneficial Owner's name, address, or unique identifying number provided in a report.

A Reporting Company is not required to file an updated report for any changes to previously reported personal information about a Company Applicant.

## **FAQ: What should I do if an entity that I initially filed a CTA report for later becomes exempt?**

***The BOSS database allows entities to later indicate that they meet a reporting exemption. The process to indicate that an entity now meets an exemption is as simple as checking a box.***

**FAQ: My driver's license or passport expired, am I required to file an update to my CTA report if I am a Beneficial Owner?**

***No. You are not required to update your CTA report simply because your driver's license or passport expires. However, you will be required to update your CTA report if any of the information on your driver's license or passport changes. For example, if you were to change residential addresses.***



## FAQ: How do I ensure that my organization is maintaining accurate CTA reports?

***To ensure that your organization maintains accurate CTA reports, we recommend developing internal tracking processes (i.e., a dedicated process owner). In addition, we recommend discussing the importance of providing updated information with all individuals that qualify as a Beneficial Owner. For instance, a Beneficial Owner must provide updates if they were to change residential addresses.***



***Section IV. Key Considerations for Health  
Care Entities.***

# Exemptions for Health Care Entities

***There is no health care specific reporting exemption. However, the following are likely most applicable to health care entities:***

- Large Operating Company
- Entities Exempt from Taxation Under Section 501(c) of the Internal Revenue Code
- Wholly-Owned Subsidiaries of Certain Exempted Entities
- Dormant and Inactive Entities

As we will discuss later, The applicability of the Wholly-Owned Subsidiaries of Certain Exempted Entities exemption was greatly limited by FinCEN guidance published on January 12, 2024.

# The Large Operating Company Exemption

*The Large Operating Company exemption applies to any entity that meets **ALL** the following requirements:*

- The entity employs more than **20 full-time employees**; and
- The entity has an operating presence at a **physical office within the United States**; and
- The entity filed a Federal income tax or information return in the United States for the previous year demonstrating **more than \$5,000,000 in gross receipts or sales**. If the entity is part of an affiliated group of corporations within the meaning of 26 U.S.C. 1504, refer to the consolidated return for such group.

# The Tax-Exempt Entity Exemption

*The Tax-Exempt Entity exemption applies to any entity that meets **ANY** of the following requirements:*

- The entity is an organization that is described in **section 501(c)** of the Internal Revenue Code; or
- The entity is an organization that is described in section 501(c) of the Internal Revenue Code, and was exempt under section 501(a), but lost its tax-exempt status **less than 180 days ago**; or
- The entity is **a political organization**, as defined in section 527(e)(1) of the Internal Revenue Code, that is tax exempt under section 527(a); or
- The entity is a **trust** described in paragraph (1) or (2) of section 4947(a) of the Internal Revenue Code.

**FAQ:** My newly formed entity has not received an IRS determination letter stating that it is tax-exempt, does the tax-exempt entity exemption still apply?

***Good Question. The CTA is ambiguous as to whether the tax-exempt entity exemption applies to a newly formed entity that has not received an IRS determination letter. To ensure compliance and avoid potential penalties, we recommend filing an initial CTA report. Once your entity receives the IRS determination letter, you can file an amended CTA report stating that the entity is now exempt from reporting obligations.***

# The Inactive Entity Exemption

*The Inactive Entity exemption applies to any entity that meets **ALL** the following requirements:*

- The entity was in existence on or before **January 1, 2020**; and
- The entity is **not engaged in active business**; and
- The entity is **not owned by a foreign person**, whether directly or indirectly, wholly or partially; and
- The entity has not experienced any **change in ownership** in the preceding twelve-month period; and
- The entity has not sent or received funds in an amount **greater than \$1,000**, in the preceding twelve-month period; and
- The entity **does not otherwise hold any kind or type of assets**, including any ownership interests in any corporation, limited liability company, or other similar entity.



# Health Care Joint Ventures and Reporting Obligations

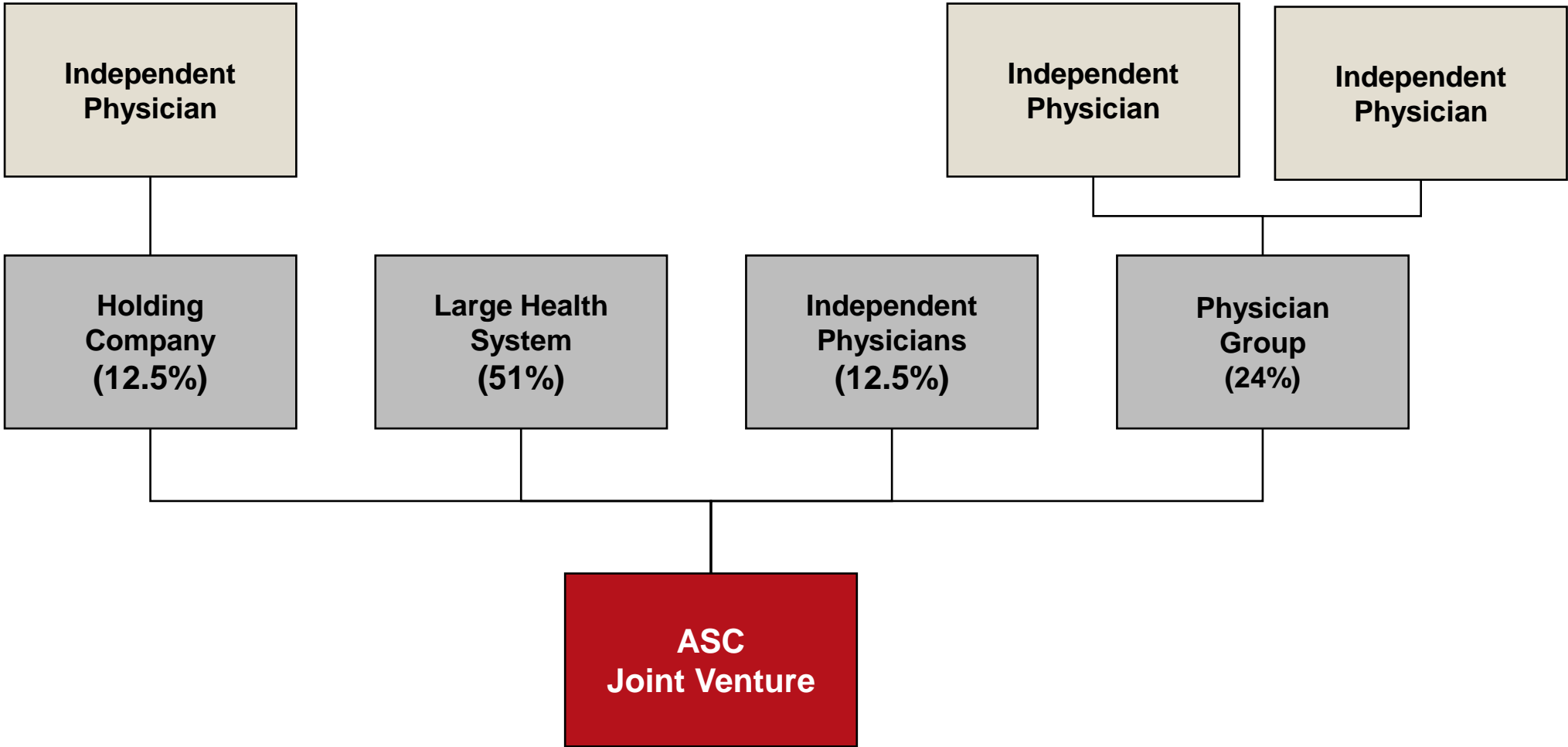
***Prior to January 12, 2024, there were many questions surrounding the applicability of the Wholly-Owned Subsidiaries of Certain Exempted Entities exemption. However, FinCEN clearly indicated that a subsidiary with ownership interests that are only partially owned by an exempt entity will not qualify for the exemption.***

FinCEN specifically stated that, “[i]f an exempt entity controls some but not all of the ownership interests of the subsidiary, the subsidiary does not qualify. To qualify, a subsidiary’s ownership interests must be fully, **100 percent owned or controlled by an exempt entity.**”

Based on this guidance, joint ventures involving **independent physicians** or any entity that **fails to qualify for an exemption** must report under the CTA. Therefore, health care entities should carefully review their current joint venture arrangements to determine whether they will be required to report prior to January 1, 2025.

The following illustration indicates how nuanced the health care joint venture analysis can become under the Corporate Transparency Act.

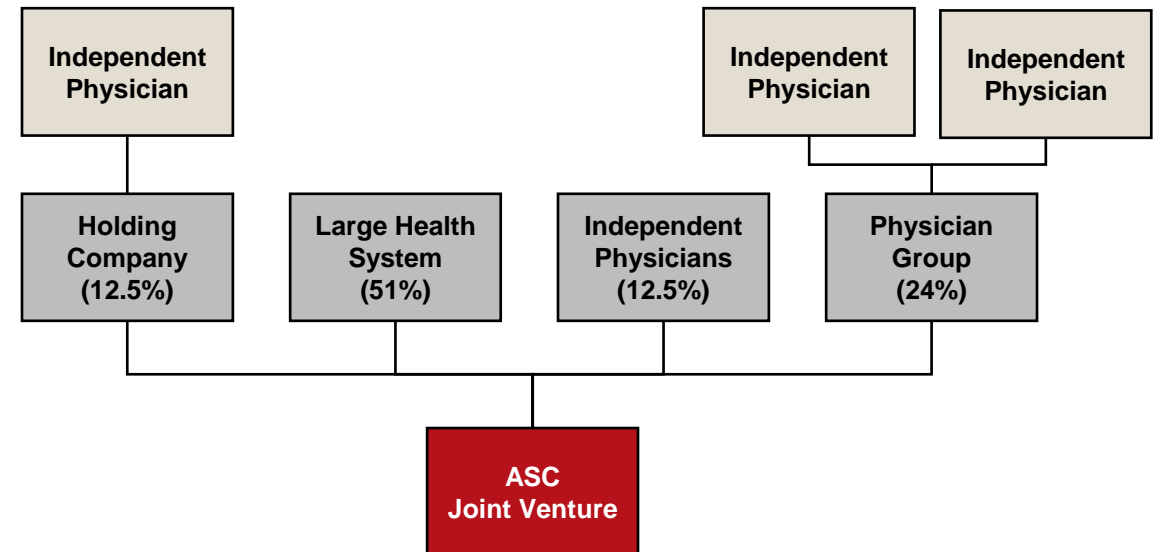
# Practical Application: CTA Reporting Analysis



# Practical Application: CTA Reporting Analysis

## CTA Joint Venture Reporting Considerations:

1. When was the ASC Joint Venture formed?
2. Does the ASC Joint Venture qualify for a reporting exemption independently?
  - Large Operating Company Exemption
  - Tax-Exempt Entity Exemption
  - Inactive Entity Exemption
3. Does the ASC Joint Venture qualify for the Wholly-Owned Subsidiary exemption?
4. Who are the Beneficial Owners of the ASC Joint Venture?
  - Substantial Control Test
  - 25% of Ownership Test
5. Does the ASC Joint Venture need to identify any Company Applicants?
6. What other entities are required to file a CTA report?





***Section V. Maintaining Compliance Based on Recent Updates.***

# National Small Business Association v. Yellen

***The ruling from U.S. District Court Judge Liles C. Burke left many Reporting Companies formed prior to January 1, 2024, wondering what's next?***

- Reporting Companies formed prior to January 1, 2024, should continue to gather required information related to the Reporting Company itself and any Beneficial Owners. However, these Reporting Companies could delay filing their CTA report with FinCEN until the appeals process is completed or FinCEN releases additional guidance later in the year.
- On the other hand, Reporting Companies formed after January 1, 2024, should continue to comply with the 90-day reporting deadline to ensure compliance with the CTA.
- In addition to federal legislation, individual states like New York have passed localized laws aimed at promoting transparency into entities formed within their state. Therefore, be on the lookout for localized reporting obligations in addition to the CTA.

FinCEN intends to publish rolling guidance surrounding compliance with the CTA throughout the remainder of this calendar year and beyond.



# ***Section VI. Questions?***



## ***Section VII. Additional Resources***

# Additional Resources

- **CTA – Statute and Regulations:**
  - [31 U.S.C. § 5336](#)
  - [Regulations](#)
- **Hall Render Alert:**
  - [The Corporate Transparency Act: What it Means and How it will Affect Your Entities](#)
- **FinCEN Resources:**
  - [The Small Entity Compliance Guide](#)
  - [Beneficial Ownership Information Reporting – Frequently Asked Questions](#)



# Questions

For more information on these topics  
visit [hallrender.com](https://hallrender.com).



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