

TAX UPDATE FOR EXEMPT ORGANIZATIONS - 2022

December 13, 2022



Today's presenters



Morgan Souza

Senior Manager, Washington National Tax

Morgan Souza is a senior manager in the exempt organization's group of the Washington National Tax office of RSM US LLP.



Erica Cline

Senior Manager, Tax Services

Erica is a senior manager and part of RSM's Washington metro market's state and local tax group at RSM US LLP.



Ayana Martinez

Principal, Washington National Tax

Ayana is a principal and part of the Washington National Tax international tax services practice at RSM US LLP.

Learning objectives

By the end of this presentation, participants will be able to:

- Discuss key tax considerations for exempt organizations
- Describe recent updates in the areas of federal, state and local, and international tax



FEDERAL TAX UPDATES

NEWS FROM THE IRS

Federal tax updates

2022-2023 Priority Guidance Plan

- Guidance year: July 1, 2022 – June 30, 2023
- Ten items directly affecting exempt organizations
 - Rev. Proc. 80-27 regarding group exemption letters (Notice 2020-36 published May 18, 2020)
 - Final regulations on supporting organizations (Proposed regulations published Feb. 19, 2016)
 - UBTI regulations on allocation of expenses and NOL carrybacks
 - Self-dealing issues relating to PF and DP coinvesting in partnerships
 - **DAF regulations**
 - **Regulations under section 4966 regarding donor advised funds, regarding the excise taxes on donor advised funds and fund management**
 - **Regulations under section 4967 regarding prohibited benefits, including excise taxes on donors, donor advisors, related persons, and fund management**
 - **Regulations under section 4958 regarding donor advised funds and supporting organizations**
 - **Guidance regarding the public support computation with respect to distributions from donor advised funds**
 - Section 6104(c) disclosure to state officials (Published Aug. 16, 2022)
 - Section 7611 church audit regulations (Proposed regulations published Aug. 5, 2009)

[RSM Tax Alert](#)

Compliance program and priorities

- IRS's [website](#) updated quarterly
- Priorities include implementation of The Inflation Reduction Act (IRA)
- Current TE/GE priorities
 - Deploy e-filing of additional returns, including Forms 5227, 5330, and 8038-CP
 - Launch new consolidated TE/GE Examination Internal Revenue Manual (IRM)
 - Monitor and evaluate case work on compliance strategies in process
 - Collaborate across IRS on existing and emerging issues, including examinations of high income/high wealth individuals
 - Expand the use of data, machine learning, and artificial intelligence algorithms to select returns for exam
- Additional items for employee plans and tax-exempt bonds

[RSM Tax Alert](#)

2023 inflation adjustments

Items affecting tax exempt organizations	2023 inflation adjustment
Exemption of annual dues paid to agricultural or horticultural organizations	\$191
Low cost articles, for purposes of defining an unrelated trade or business	\$12.50
Insubstantial benefits that may be received by a donor without reducing the value of the charitable contribution deduction	\$12.50, \$62.50, and \$125
Dues limitation for the reporting exception for nondeductible lobbying expenditures	\$132
Penalty for failure to file a 2023 Form 990-T	Lesser of \$485 or 100% of the amount required to be shown as tax
Penalty for failure to file a 2023 Form 990, Form 990-EZ or Form 990-PF (Organizations with gross receipts of \$1,208,500 or less)	\$20 per day, not to exceed the lesser of \$12,000 or 5% of gross receipts
Penalty for failure to file a 2023 Form 990, Form 990-EZ or Form 990-PF (Organizations with gross receipts over \$1,208,500)	\$120 per day, not to exceed \$60,000

[Rev. Proc. 2022-38](#)

Mandatory e-file update

Form	E-filing requirement
Form 990-PF	YE 7/31/20 and later
Form 990	YE 7/31/20 and later
Form 990-EZ	YE 7/31/21 and later
Form 990-T	2020 Forms 990-T and later
Form 4720	2020 Forms 4720 and later *Required for Form 990-PF filers
Form 8872	Periods 1/1/20 and later
Form 1023	Effective February 1, 2020
Form 1024-A	Effective January 6, 2021
Form 1024	Effective January 3, 2022

Failure to e-file is failure to file

- IRS issued [PMTA 2022-05](#) (July 8, 2022)
- Paper filing a mandatory e-file return constitutes failure to file
- Taxpayers may be subject to failure to timely file penalties under sections 6651(a) or 6652(c), unless able to demonstrate reasonable cause

[See RSM Tax Alert](#)

Forms 4720: Common pitfalls

- Private foundation must e-file
 - Other exempt organizations may paper-file (e-file recommended)
- Disqualified persons must paper-file
 - Organizations and disqualified persons may not file combined Form 4720
- ONLY complete the portions of the form applicable to the filer
 - Organizations: Do not complete Part II
 - Disqualified persons: Do not complete Part I
- Abatement requests now require paper-filed Forms 843

RECENT GUIDANCE AND DEVELOPMENTS

Federal tax updates

New guidance for 2022

- Court cases of interest to exempt organizations
- The Inflation Reduction Act of 2022
- Final regulations
- Other guidance

Redi Foundation v. Commissioner

- The founder of a section 501(c)(3) organization held to be an employee of the foundation for employment tax purposes
 - Founder served as a board member and an officer
 - Served as the sole service provider
 - Did not meet the “minor services” exception

[Redi Foundation v. Comm'r, T.C. Memo 2022-34.](#)

Mayo Clinic v. United States

- Mayo Clinic held to be a qualified organization described in section 170(b)(1)(A)(ii)
 - Primary purpose is educational
 - Entitled to \$11.5 million refund for exclusion of debt-financed rental income under section 514(c)(9)
- Activities may further both educational and noneducational purposes
 - Relevant inquiry: Does the activity have a purpose in addition to education or no educational purpose?
- Noneducational activities held to be insubstantial
 - Patient care and clinical practice are part of educational mission
 - Research and laboratory testing further educational purposes
 - Administrative functions are incidental and are not disqualifying

[Mayo Clinic v. United States, No. 16-cv-03113 \(D. Minn\).](#)

The Inflation Reduction Act of 2022

- Imposes corporate minimum tax on adjusted financial statement income (AFSI) over \$1 billion
 - Section 56A(c)(12) provides that AFSI only includes and exempt organization's UBI
 - Not expected to apply to exempt organizations
- Exempt organization may elect direct payment of 12 clean energy credits under section 6417
 - Includes states and political subdivisions and tribal governments
 - Exempt organizations may elect credit refunds using Form 990-T
 - Applicable for tax years beginning after Dec. 31, 2022

Final regulations: Disclosure to state officials

- Effective Aug. 16, 2022
- Largely adopt proposed regulations under Section 6104(c)
- Describe the authority and scope of the IRS's disclosure of certain exempt organization taxpayer information to state officials
 - IRS authorized to disclose information about certain *proposed* revocations and proposed denials
 - IRS may disclose information to a designated state officer or employee, but not to an agent or contractor
 - State officials must notify the IRS of an intent to redisclose any information obtained under this provision, and such redisclosure may be prohibited

Rulings and determinations

- Rev. Proc. 2022-3: Areas in which rulings will not be issued
 - Section 3.01(127) – acts of self-dealing when a private foundation (or other entity subject to section 4941) owns or receives an interest in a limited liability company or other entity that owns a promissory note issued by a disqualified person
- Rev. Proc. 2022-5: Determination letters (exempt organizations)
 - IRS will not grant exempt status under section 501(c)(5) for organizations that promote the growth, improvement, betterment of marijuana crops (and other controlled substances)

Form 990-N auto-revocation

- Ineligible Form 990-N filers will be automatically revoked for failure to file for three consecutive years
 - Form 990-N is not a valid filing if the organization is required to file Form 990, 990-EZ, or 990-PF
 - [FSA 20221101F](#)

Secure messaging for IRS exams

- TE/GE required to invite taxpayers to use The Taxpayer Digital Communications Secure Messaging (TDC SM) for exams beginning after June 22, 2022
- TDC SM is optional
 - Similar to a web-based email platform
 - Taxpayers and representatives may send/receive messages to/from IRS
 - Upload attachments securely

Compensation reporting for management companies

- Organizations that do not report management company compensation on Form 990 in accordance with the instructions must start doing so for 2022 returns (filed 5/15/23 and later)
- [Announcement 2001-33](#) provided a reasonable cause exception to certain management company compensation reporting
- [Announcement 2021-18](#) rescinds that exception

2022 Audit technique and technical guides

- TEGE working to combine and update the Audit Technique Guides with other technical content to create [Technical Guides](#)
- New in 2022:
 - [TG 6 IRC 501\(c\)\(6\) Business Leagues](#)
 - [TG 23 Religious and Apostolic Associations IRC 501\(d\)](#)
 - [TG 58 Excise Taxes on Self-Dealing under IRC 4941](#)
 - [TG 62 Excise Taxes on Taxable Expenditures under IRC 4945](#)

2022 Issue snapshots

- [Private Foundations: Incidental and Tenuous Exception to Self-Dealing Under Treas. Reg. 53.4941\(d\)-2\(f\)\(2\)](#)
- [Private Foundations: Estate Administration Exception to Indirect Self-Dealing Under Treas. Reg. 53.4941\(d\)-1\(b\)\(3\)](#)
- [Private Foundations: Treatment of Qualifying Distributions IRC 4942\(h\)](#)
- [Qualified Parking Fringe Benefit](#)

ANTICIPATED DEVELOPMENTS

Federal tax updates

Continued focus on donor advised funds

- Accelerating Charitable Efforts (ACE) Act
 - Proposes a number of limitations on DAFs and their donors
 - Introduced in both chambers
 - Expected to be reintroduced in the new Congress
- Current administration proposal (Green Book)
 - Private foundations' distributions to DAFs would not constitute qualifying distributions unless paid out of corpus

Other proposals

- Charitable mileage rate proposals
 - Match with business mileage rate
 - Increase to \$0.625 for 2 years and permanently to \$0.24
- Make permanent non-itemized charitable contribution deduction
 - Many additional proposals being discussed to incentivize charitable giving
- Educational Choice for Children Act
 - Credit for charitable contributions to exempt organizations that provide scholarships to certain elementary and secondary school students
- Reductions to section 4968 excise tax for scholarships
 - Build Back Better included proposed amendments
 - Credit against excise tax for scholarship dollars provided by institution

Spotlight on coaches' compensation

- House Ways and Means Oversight Subcommittee issued a [report](#) compiling coaches' salary information from 9 major colleges and universities
 - Summarized athletics revenue and coaches' compensation in excess of \$1 million, based on the schools' tax return filings and their written responses to letters from Rep. Pascrell
- The report does not contain formal recommendations



STATE AND LOCAL TAX UPDATES

DIGITAL PRODUCTS

State and local tax updates

Digital products

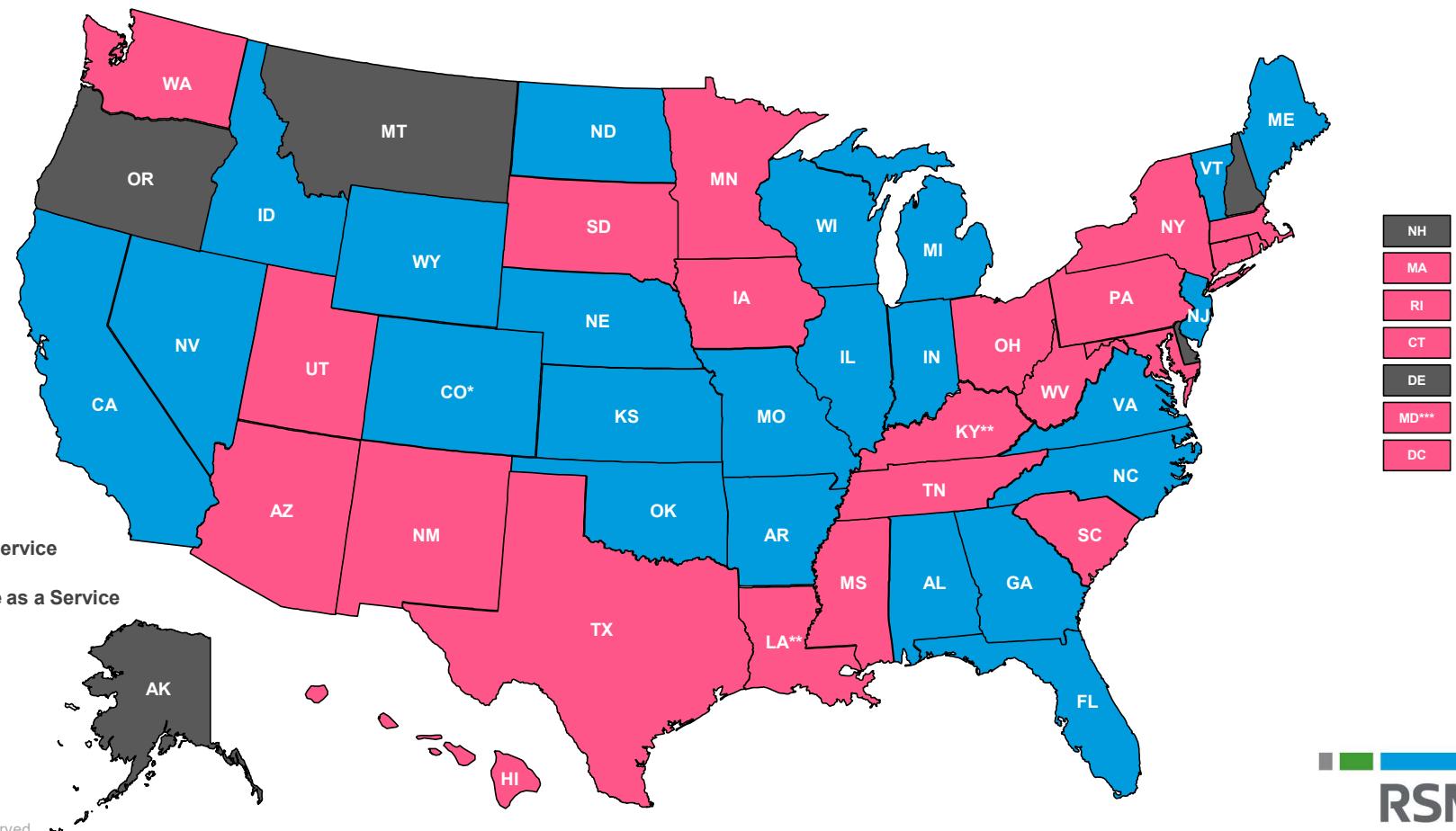
- As taxpayers expand their nexus footprint, they must also determine if their products/services are taxable in these new jurisdictions.
- More and more states/localities taxing digital products:
 - Software as a Service (SaaS)
 - E-books and other downloaded materials
 - Pre-recorded webcasts or professional education
 - Digital applications (visual and/or audio)

States that tax Software as a Service (SaaS) (as of November 1, 2022)

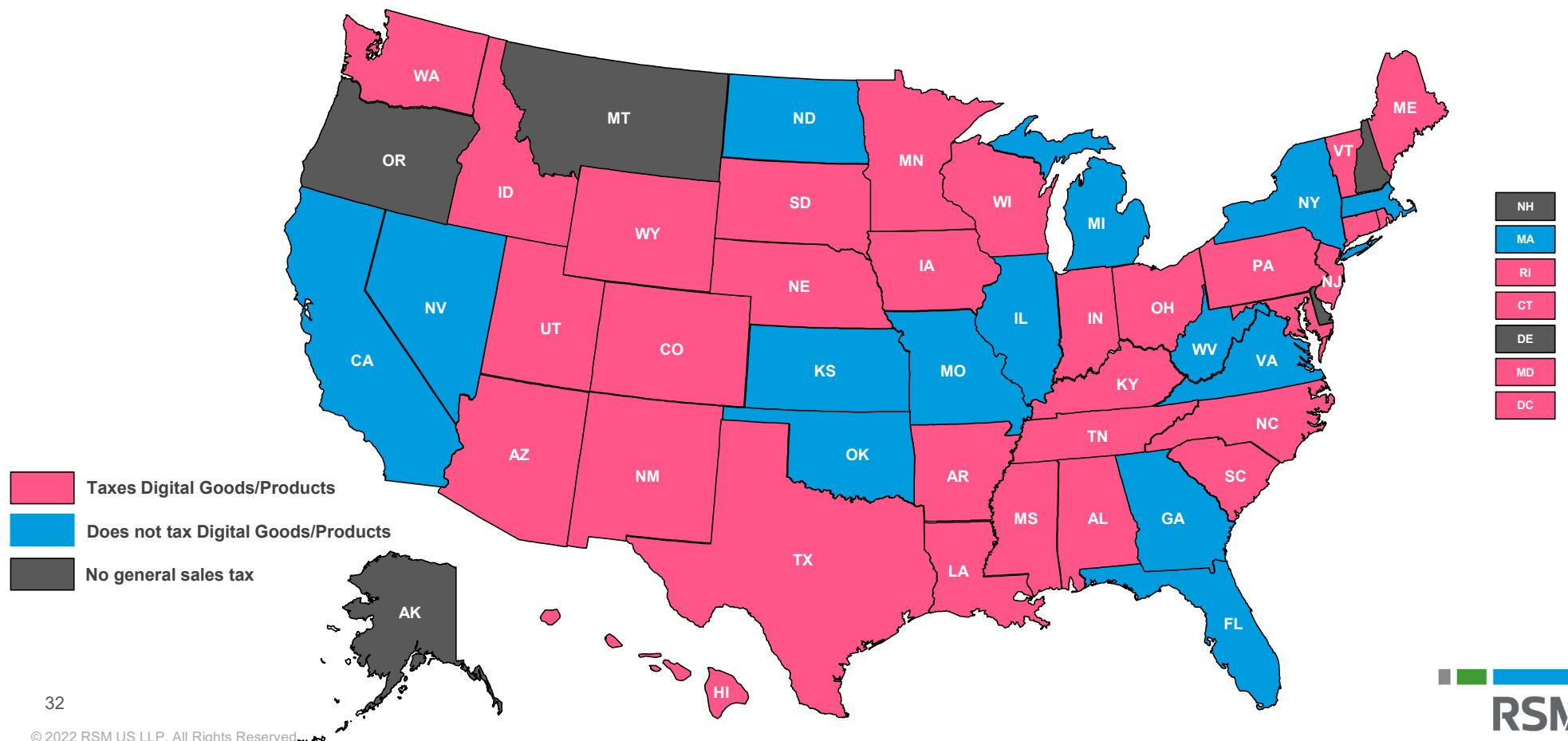
*The state of Colorado does not tax SaaS, but many local jurisdictions apply their own taxability rules and regulations

**Effective Jan. 1, 2023 (Kentucky, Louisiana)

***Exemptions for specific types of software apply (Maryland)



States that tax digital goods/products (as of November 1, 2022)



Digital products – state and local tax

- Items for exempt organizations to consider:
 - Do we have membership dues? If so, what do our members receive in exchange for dues?
 - Do we offer online events? Are there any downloads participants receive with those events?
 - Do we earn revenue from online advertisements?
 - Do we sell digital publications?
- Have we expanded our nexus footprint in recent years? If so, have we reviewed taxability in those new jurisdictions?



RECENT DEVELOPMENTS & LEGISLATIVE GUIDANCE

State and local tax updates

Letter Ruling #22-06 (August 8, 2022)

- Out-of-state section 501(c)(3) organization selling subscriptions to its print and electronic publications to Tennessee customers
 - Subscriptions to the electronic versions of the taxpayer's publications
 - Sales of advertising space in the print and online publications
 - Sales of subscription access to other electronic publications and databases

Maryland

Broadway Services, Inc. v. Comptroller of Maryland, Docket No. C-02-CV-18-000554 (Md. Ct. App., April 1, 2022)

- Maryland Court of Appeals held that a for-profit company could not purchase cleaning supplies for use in tax-exempt hospitals free of sales tax
- Implied agency relationship between Broadway and the hospitals
- Purchasing and providing cleaning supplies for use by the hospitals' janitorial staffs
- Is the agency relationship alone sufficient?
- Maryland's sales tax exemption rules

Maryland

Comcast v. Comptroller of Maryland, Docket No. C-02-CV-21-000509 (Md. Cir. Ct. Oct. 20, 2022)

- Struck down the Maryland tax on digital advertising services.
- Held that the tax violates the Internet Tax Freedom Act, the federal commerce clause, and the first amendment.
 - Digital advertising is similar to traditional advertising
 - Tax targets out-of-state companies and interstate commerce by using worldwide gross revenues to calculate the tax
- Caution: Maryland intends to appeal

EXEMPTION CERTIFICATE MANAGEMENT

State and local tax updates

Collecting customers' exemption certificates



Selling taxable items
= tax collection or
exempt certificate



Is good faith
acceptance enough?



Does one state
certificate work
for all?



Multistate tax
type risk



Automated versus
manual

Exemption certificates: True or false?



Misconceptions

- “I’m always exempt because the IRS says so.”
- “I’m not registered to collect tax, so I don’t need to.”



Realities

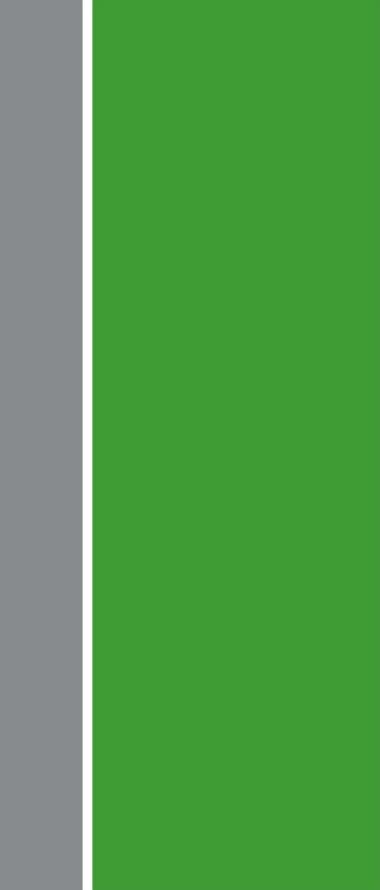
- Certain state exemptions, but not all
- Purchases = exempt
- Taxable sales = taxable

Exemption certificates (cont.)

- In order to be exempt from paying sales taxes, most states require a completed sales tax exemption form be submitted to the seller at the time of the purchase.
- Exemption requirements
- Section 501c3 letter of exemption does NOT exempt entity from sales tax
 - Example: Universities

Exemption certificates – North Carolina

- In order to be exempt from paying sales taxes, most states require a completed sales tax exemption form be submitted to the seller at the time of the purchase.
 - *Exception: North Carolina*
- **North Carolina procedure:**
 - Tax paid up front
 - Semiannual claim for refund: [Form E-585](#)
 - October 15 and April 15
 - Qualifications



INTERNATIONAL TAX UPDATES

FORM 5471 FILING FOR FOREIGN CHARITABLE ENTITY

International tax updates

Form 5471 filing for foreign charitable entity

Determining whether an exempt organization (EO) has a 5471 filing requirement:

1. Entity was formed in foreign jurisdiction.
2. Entity is a separate legal entity with limited liability for members/ shareholders/ board and is not a branch in foreign jurisdiction.
3. Meets ownership requirements
 1. The entity has stock or shares and the EO is a U.S. shareholder (has a 10% or greater interest in it by vote or value); OR
 2. The entity does not have stock or shares, but the EO has control over the entity via majority of the board seats or being the sole member, etc.

Form 5471 filing for foreign charitable entity

Related Form 8992, U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI), Filing Obligation:

- A U.S. Shareholder of a CFC is required to file a Form 8992, even if there is no GILTI tax payable.

Failure to file forms 5471 could result in substantial penalties.

- \$10,000 for each Form 5471;
- Additional \$10,000 for failure to file Schedule O of Form 5471.

Delinquent International Information Return Submission Procedures ([DIIRSP](#))

- Taxpayers may be able to remedy failed filings for prior years through this program.
 - Attach delinquent returns to the amended return and file in accordance with instructions for the amended return.
 - Penalties may still be assessed regardless of reasonable cause and organization may still need to respond to questions from the IRS regarding the delinquent filings.

Form 5471 filing for foreign charitable entity

Potential alternatives

- Check-the-box election
 - Organizations considered to be U.S. Shareholders and control or wholly own subsidiaries may want to consider “checking the box” for the entity and treat it as an FDE.
 - File Form SS-4 (if entity does not already have an EIN)
 - File Form 8832 (one time filing) to make an election to treat the foreign entity as a FDE for US tax purposes.
 - As a FDE, income and expenses would flow-through to the parent organization.
 - Form 8858 would need to be filed for FDE
 - **Note: if there is a chance that UBI would flow through from the foreign entity to the U.S. organization, treating the foreign entity as a FDE may not be beneficial.**

Reminders: Form 5471, Schedule M and Form 5713

- Schedule M update on Form 5471.
 - Grants need to be included on line 14 “other amounts received” along with an attachment.
- Form 5713 – International Boycott
 - Digital services : As organizations occupy the digital space much more than before, associations should be aware of students or organization logging on and buying services from countries on the boycotted country list. This could trigger a Form 5713 filing requirement.



ALTERNATIVE INVESTMENTS

International tax updates

Schedules K-2 and K-3

- New for 2021 K-2 and K-3 reporting requirements
 - **Form K-2**
 - An extension of Schedule K
 - Used to report international tax items for partnerships
 - **Form K-3**
 - An extension of Schedule K-1
 - Used to report partner share of items reported on K-2
 - Not all international tax provisions are identified on the new Schedules.
 - If an international provision is relevant to determining U.S. tax and is not included on Schedules K-2 or K-3, a separate statement must be attached.
 - For 2022, there is a more limited exception for K-2 and K-3 reporting, so expect more of these forms.

Form 8858 – Indirect partner

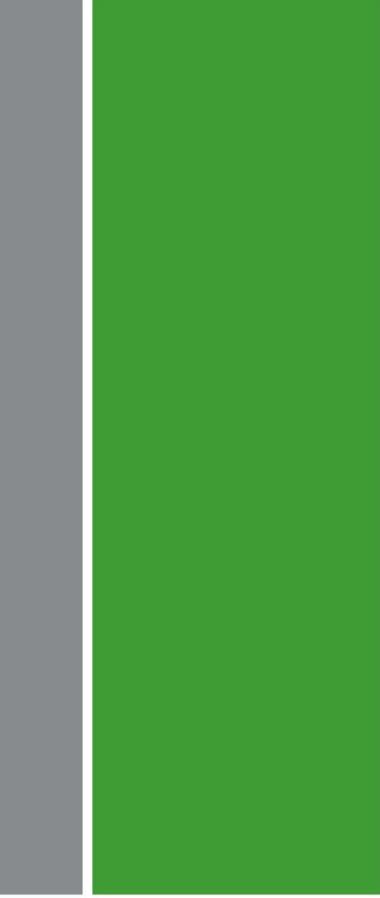
Does an indirect partner in a FDE have to file the Form 8858?

- A U.S. person that indirectly/constructively owns a foreign disregarded entity (FDE) through a tiered structure (partnerships or FDEs), has a Form 8858 filing requirement.
- A U.S. corporation that is a partner in a U.S. partnership must file even though it is not the “tax owner” of the FDE.
 - U.S. Corp - must complete information related to its distributive share related to dual consolidated loss (DCL), pursuant to Regulations sections 1.1503(d)-1 through 1.1503(d)-8, on Schedule G.

Form 8858 filing from K-1 footnote information – Multiple filer exception

Does the multiple filer exception automatically apply if the direct tax owner files the return?

- The multiple filer exception only applies - instances where there is a Form 5471 and 8865
- Category 4 or 5 filers of Form 5471 and Category 1 filers of Form 8865 may be eligible for the exception
- Purpose for requiring this filing for an indirect owner - capture information relating to dual consolidated losses (DCL)



CORPORATE TRANSPARENCY ACT AND EXEMPT ORGANIZATIONS

International tax updates

Corporate Transparency Act

- This past September, the Department of Treasury issued final regulations implementing the Corporate Transparency Act, effective January 1, 2024.
 - Companies formed before January 1, 2024, are required to report beneficial owners by January 1, 2025.
 - Companies formed after January 1, 2024, are required to report within 30 days that regulation becomes effective.
- The CTA will require certain companies to report to FinCen certain information about their owners, beneficial owners and related individuals.

Corporate Transparency Act - Reporting companies and information reported

- The “reporting company” subject to these regulations are domestic corporations, LLCs, limited partnerships. It also includes foreign entities that are registered to do business in the U.S., by filing a registration document with any state’s Secretary of State.
- Reporting companies will have to report the following about their beneficial owners:
 - Full legal name
 - Date of birth
 - Address
 - Identifying number

Corporate Transparency Act - Exceptions

- Under the U.S. Code and regulations, certain entities are exempt from reporting obligations under the CTA. Exempt entities include (but not limited to):
 - Accounting firms,
 - Organizations exempt from tax under IRC section 501(a),
 - An entity that operates exclusively to provide financial assistance or hold governance over a IRC section 501(c) entity,
 - Any subsidiary whose ownership interests are owned or controlled by any other exempt entity (such as a registered IRC section 501(c) tax exempt organization).

FORM 990 REPORTING OF FOREIGN ACTIVITY

International tax updates

Form 990, “Core” Form

- Form 990, Part IV, Checklist of required schedules
 - (Lines 14–16)

Form 990 (2020)

Page 3

Part IV Checklist of Required Schedules

	Yes	No
14a Did the organization maintain an office, employees, or agents outside of the United States?	<input type="checkbox"/>	<input type="checkbox"/>
b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If “Yes,” complete Schedule F, Parts I and IV.	<input type="checkbox"/>	<input type="checkbox"/>
15 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If “Yes,” complete Schedule F, Parts II and IV	<input type="checkbox"/>	<input type="checkbox"/>
16 Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If “Yes,” complete Schedule F, Parts III and IV.	<input type="checkbox"/>	<input type="checkbox"/>

15

Did the organization maintain an office, employees, or agents outside of the United States?

b Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If “Yes,” complete Schedule F, Parts I and IV.

16

Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If “Yes,” complete Schedule F, Parts II and IV

17

Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If “Yes,” complete Schedule F, Parts III and IV.

Form 990, Schedule F, Parts I-III

Statement of Activities Outside the United States

- Part I – General Information

- Report foreign activities by region (column (a))
- Report expenditures to nearest \$1,000 (column (f))

3 Activities per Region. (The following Part I, line 3 table can be duplicated if additional space is needed.)

(a) Region	(b) Number of offices in the region	(c) Number of employees, agents, and independent contractors in the region	(d) Activities conducted in the region (by type) (such as, fundraising, program services, investments, grants to recipients located in the region)	(e) If activity listed in (d) is a program service, describe specific type of service(s) in the region	(f) Total expenditures for and investments in the region
(1)					

- Part II & III – Grants and Other Assistance

- Complete for each recipient that received more than \$5,000
- Include payments to U.S. recipients for foreign activities

Form 990, Schedule F, Part IV Statement of Activities Outside the United States

- Checklist of foreign forms that may be required

Schedule F (Form 990) 2020 Page 4

Part IV Foreign Forms

1 Was the organization a U.S. transferor of property to a foreign corporation during the tax year? If "Yes," the organization may be required to file Form 926, Return by a U.S. Transferor of Property to a Foreign Corporation (see Instructions for Form 926) Yes No

2 Did the organization have an interest in a foreign trust during the tax year? If "Yes," the organization may be required to separately file Form 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts, and/or Form 3520-A, Annual Information Return of Foreign Trust With a U.S. Owner (see Instructions for Forms 3520 and 3520-A; don't file with Form 990) Yes No

3 Did the organization have an ownership interest in a foreign corporation during the tax year? If "Yes," the organization may be required to file Form 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations (see Instructions for Form 5471) Yes No

4 Was the organization a direct or indirect shareholder of a passive foreign investment company or a qualified electing fund during the tax year? If "Yes," the organization may be required to file Form 8621, Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund (see Instructions for Form 8621) Yes No

5 Did the organization have an ownership interest in a foreign partnership during the tax year? If "Yes," the organization may be required to file Form 8865, Return of U.S. Persons With Respect to Certain Foreign Partnerships (see Instructions for Form 8865) Yes No

6 Did the organization have any operations in or related to any boycotting countries during the tax year? If "Yes," the organization may be required to separately file Form 5713, International Boycott Report (see Instructions for Form 5713; don't file with Form 990) Yes No

Schedule F (Form 990) 2020

Form 990, Schedule R, Parts I-IV

- Foreign disregarded entities, corporations, partnerships, tax exempt organizations, and trusts are also reported on Schedule R. See below.

SCHEDULE R (Form 990)		Related Organizations and Unrelated Partnerships						OMB No. 1545-0047															
Department of the Treasury Internal Revenue Service		Complete if the organization answered "Yes" on Form 990, Part IV, line 33, 34, 35b, 36, or 37. Attach to Form 990. Go to www.irs.gov/Form990 for instructions and the latest information.						2022 Open to Public Inspection															
Name of the organization								Employer identification number															
Part I Identification of Disregarded Entities. Complete if the organization answered "Yes" on Form 990, Part IV, line 33.																							
(a) Name, address, and EIN (if applicable) of disregarded entity		(b) Primary activity		(c) Legal domicile (state or foreign country)		(d) Total income		(e) End-of-year assets		(f) Direct controlling entity													
(1)																							
Part II Identification of Related Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a partnership during the tax year.																							
Name, address		(a) Name, address, and EIN of related organization		(b) Primary activity		(c) Legal domicile (state or foreign country)		(d) Direct controlling entity		(e) Predominant income (related, unrelated, excluded from tax under sections 512-514)		(f) Share of total income		(g) Share of end-of-year assets		(h) Disproportionate allocations?		(i) Code V-UBI amount in box 20 of Schedule K-1 (Form 1065)		(j) General or managing partner?		(k) Percentage ownership	
(1)		(1)														<input type="checkbox"/> <input type="checkbox"/>		<input type="checkbox"/> <input type="checkbox"/>		<input type="checkbox"/> <input type="checkbox"/>		<input type="checkbox"/> <input type="checkbox"/>	

Form 990, Schedule R, Parts I-IV

- Foreign disregarded entities, corporations, partnerships, tax exempt organizations, and trusts are also reported on Schedule R. See below.

Part III Identification of Related Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a partnership during the tax year.											
(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Predominant income (related, unrelated, excluded from tax under sections 512–514)	(f) Share of total income	(g) Share of end-of-year assets	(h) Disproportionate allocations?	(i) Code V—UBI amount in box 20 of Schedule K-1 (Form 1065)	(j) General or managing partner?	(k) Percentage ownership	
								Yes	No	Yes	No
(1).....							<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
.....											

Part IV Identification of Related Organizations Taxable as a Corporation or Trust. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a corporation or trust during the tax year.									
(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Type of entity (C corp, S corp, or trust)	(f) Share of total income	(g) Share of end-of-year assets	(h) Percentage ownership	(i) Section 512(b)(13) controlled entity?	
								Yes	No
(1).....								<input type="checkbox"/>	<input type="checkbox"/>
.....									

Form 990, Schedule R, Part V

- Part V provides for a disclosure of related party transactions, like a disclosure on the Form 5471 Schedule M or Form 8865 Schedule N. See below.

Part V Transactions With Related Organizations. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, 35b, or 36.

Note: Complete line 1 if any entity is listed in Parts II, III, or IV of this schedule.

1 During the tax year, did the organization engage in any of the following transactions with one or more related organizations listed in Parts II-IV?

- a Receipt of (i) interest, (ii) annuities, (iii) royalties, or (iv) rent from a controlled entity
- b Gift, grant, or capital contribution to related organization(s)
- c Gift, grant, or capital contribution from related organization(s)
- d Loans or loan guarantees to or for related organization(s)
- e Loans or loan guarantees by related organization(s)

- f Dividends from related organization(s)
- g Sale of assets to related organization(s)
- h Purchase of assets from related organization(s)
- i Exchange of assets with related organization(s)
- j Lease of facilities, equipment, or other assets to related organization(s)

- k Lease of facilities, equipment, or other assets from related organization(s)
- l Performance of services or membership or fundraising solicitations for related organization(s)
- m Performance of services or membership or fundraising solicitations by related organization(s)
- n Sharing of facilities, equipment, mailing lists, or other assets with related organization(s)
- o Sharing of paid employees with related organization(s)

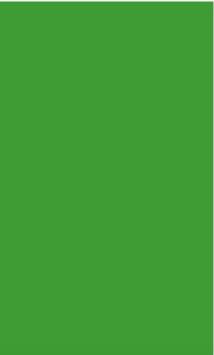
- p Reimbursement paid to related organization(s) for expenses
- q Reimbursement paid by related organization(s) for expenses

- r Other transfer of cash or property to related organization(s)
- s Other transfer of cash or property from related organization(s)

	Yes	No
1a		
1b		
1c		
1d		
1e		
1f		
1g		
1h		
1i		
1j		
1k		
1l		
1m		
1n		
1o		
1p		
1q		
1r		
1s		

2 If the answer to any of the above is "Yes," see the instructions for information on who must complete this line, including covered relationships and transaction thresholds.

(a) Name of related organization	(b) Transaction type (a-s)	(c) Amount involved	(d) Method of determining amount involved
(1)			



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