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Beyond the Basics of Affiliated Service Groups and Controlled Groups

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What Will Be Covered

- Why worry about common control?
- How do we determine controlled group status?
- How do we determine affiliated service group status?
- Examples



***Why worry about common
control?***

Common Control

- All employees of entities under common control must be considered to determine if a plan maintained by an entity under common control meets requirements of:
 - Code §401
 - Code §408(k)
 - Code §408(p)
 - Code §410
 - Code §411
 - Code §415
 - Code §416

Common Control

- If entities under common control maintain multiple plans, someone must quarterback compliance with:
 - Minimum coverage under Code §410(b)
 - Nondiscrimination requirements under Code §401(a)(4)
 - Top heavy testing under Code §416
 - Contribution and benefit limits under Code §415

Common Control

- If entities under common control maintain multiple plans, someone must quarterback issues related to:
 - Aggregating plans for testing
 - Employee transfers from one entity under common control to another entity under common control



***How do we determine controlled
group status?***

Definitions

- Controlled group definition found in Code §§ 414(b) and 414(c)
 - Code §414(b) - 2 or more corporations under common control within meaning of Code §1563(a)
 - Code §414(c) – applies to controlled group of trades or businesses (whether or not incorporated)
 - Treasury Regs 1.414(c)-1 through 1.414(c)-5 mirror Code §1563 principles

Definitions

- Controlled group relationships:
 - Parent-subsidiary
 - Brother-sister
 - Combination of above

Parent-Subsidiary

- One or more chains of corporations are connected through stock ownership with common parent
 - 80% of stock of each corporation owned by one or more corporations in the group
 - Parent must own 80% of at least one other corporation

Parent-Subsidiary Example

- XYZ Corp owns:
 - 95% of the stock of Corp A
 - 80% of the stock of Corp B
 - Corp B owns 80% profits interest in ABC Partnership
 - 62% of the stock of Corp C
- Unrelated persons own the stock not owned by XYZ Corporation

Parent-Subsidiary Example

- XYZ Corporation owns 80% or more of Corps A & B and Corp B owns 80% of ABC Partnership
- XYZ Corp is common parent of parent-subsubsidiary group consisting of XYZ Corp, Corps A & B and ABC Partnership
- Corp C is not under common control as XYZ Corp owns less than 80%

Brother-Sister

- Group of 2 or more corporations
- 5 or fewer common owners
 - Common owners must include individual, trust or estate
- Own directly or indirectly a controlling interest of each group and have effective control

Brother-Sister

- Controlling interest – 80% or more of stock of each corporation
- Effective control – more than 50% of stock of each corporation, only to extent ownership is identical

Brother-Sister Example

Ownership %

Shareholder	My Corp	Your Corp
A	82%	32%
B	8%	38%
C	6%	15%
D	4%	15%
Total	100%	100%

Brother-Sister Example

- First part of test is met
 - 4 shareholders own 100% of stock

Brother-Sister Example

Identical Ownership %

Shareholder	
A	32%
B	8%
C	6%
D	4%
Total	50%

Brother-Sister Example

- Second part of test is NOT met
 - The four shareholders do NOT own more than 50% of stock of each corporation using only identical ownership

Combined Group

- 3 or more organizations that are organized as:
 - Each organization is member of either a parent-subsidary or a brother-sister group
 - A least one corporation is the common parent of a parent-subsidary and a member of a brother-sister group

Combined Group Example

Relationship #1 - Her Corp owns 88% of My Corp

Relationship #2 Ownership %

Shareholder	His Corp	Her Corp
A	82%	40%
B	8%	30%
C	6%	15%
D	4%	15%
Total	100%	100%

Combined Group Example

- Her Corp is common parent of parent-subsidary group including Her Corp and My Corp
- Her Corp and His Corp is a brother-sister group
 - First part - 4 shareholders own 100% of stock
 - Second part – 58% identical ownership

Combined Group Example

- Her Corp, His Corp and My Corp are each members of parent-sub or brother-sister
- Her Corp
 - Common parent of Her Corp and My Corp
 - Member of Her Corp and His Corp is brother-sister group
- Her Corp, His Corp and My Corp are a combined group

Attribution

- Attribution written in terms of stock
- Same principles applied for unincorporated entities

In case of a:	Ownership relates to the:
Trust or estate	Actual interest
Partnership	Capital or profits
Sole proprietorship	Sole proprietorship

Attribution

- Use greater of:
 - Corporate ownership – voting stock or value of stock
 - Partnership ownership – capital or profits

Attribution

- Family attribution for brother-sister group

Ownership interest	Attributed to	
Spouse	Spouse	Exception - no direct ownership, no participation in co. or no more than 50% of business income is passive
Minor child (under 21)	Parent	
Parent	Minor child (under 21)	
Parent	Adult child(21 or older)	Adult child owns > 50% of business
Adult child	Parent	Parent owns > 50% of business
Grandparent	Minor or Adult child	Minor/Adult child owns > 50% of business
Minor or Adult child	Grandparent	Grandparent owns > 50% of business

Attribution

- Attribution for organizations

Ownership interest	Attributed to	
From corporation to shareholder	Corporate ownership interest attributed proportionately	Only to shareholders owning at least 5% of stock Applicable to brother-sister group only
From partnership to partners	Partnership interests attributed proportionately	Only to partners owning at least 5% of capital or profits interest Applicable to brother-sister group only
From trust to beneficiaries	Trust ownership interests attributed proportionately	Only to beneficiaries having at least 5% actuarial interest Applicable to brother-sister and parent-subsidiary groups

Attribution Example 1

- The FAM Partnership is owned as follows:
 - Dad - 40%
 - Son A (age 20) - 30%
 - Son B (age 30) - 20%
 - Unrelated person - 10%

Attribution Example 1

- Dad's ownership
 - Considered to own 90%
 - 40% direct ownership
 - 30% interest owned by Son A
 - Since Son A is a minor, ownership is attributed to Dad
 - 20% interest owned by Son B
 - Since Dad has controlling interest, Son B's ownership is attributed to Dad

Attribution Example 1

- Son A's ownership
 - Considered to own 70%
 - 30% direct ownership
 - 40% interest owned by Dad
 - Since Son A is a minor, ownership is attributed to Son A
 - No attribution between siblings

Attribution Example 1

- Son B's ownership
 - Considered to own 20%
 - 20% direct ownership
 - No attribution between siblings
 - Since Son B does not have controlling interest, Dad's interest is not attributed

Attribution Example 2

- Tina and Dave are married with no children
- Tina is the 100% owner of a pension administration firm
- Dave is the sole proprietor of a law firm specializing in criminal law
- They separately manage their own businesses

Attribution Example 2

- There is no controlled group since Tina and Dave meet the spousal exception
 - No direct ownership
 - No participation in business
 - No more than 50% of business income is passive

Attribution Example 2

- What happens if Tina and Dave have a child?
 - Their two businesses will be under common control since they both will attribute 100% ownership to their minor child

Tax Exempt Organizations

- Tax-exempt organizations are considered to be under common control if at least 80% of the directors or trustees of one organization either are
 - representatives of the other organization
 - or
 - directly or indirectly controlled by the other organization

Tax Exempt Organizations

- A director or trustee is a representative of another organization if he is also a trustee, director, agent, or employee of the other organization
- A director or trustee is controlled by another organization if the other organization has the power to remove that individual and designate a new director or trustee

Tax Exempt Example

- End Hunger, Inc. has the power to appoint 10 of the 12 trustees of Food Collectors, Inc.
- Food Collectors, Inc. owns 90% of the outstanding shares of Truck Rentals, Inc. (which is not an exempt organization)
- End Hunger, Inc. controls 7 of the 8 trustees of Collect for Hunger, Inc.

Tax Exempt Organizations

- Food Collectors, Inc. and Truck Rentals, Inc. are a Parent-Subsidiary controlled group.
- End Hunger, Inc. is under common control with Food Collectors, Inc. and Collect for Hunger, Inc. since it can appoint or controls more than 80% of the trustees of each organization
- End Hunger, Inc., Food Collectors, Inc., Truck Rentals, Inc. and Collect for Hunger, Inc. are treated as a single employer under the controlled group rules.

Tax Exempt Organizations

- Exempt organizations that maintain a plan to which Code §414(c) applies that covers one or more employees from each organization may treat themselves as under common control if each of the organizations regularly coordinates their day-to-day exempt activities

Tax Exempt Organizations

- A tax-exempt hospital and another exempt organization with which it coordinates the delivery of medical services may treat themselves as under common control if
 - a single plan covers employees of the hospital and the other exempt organization
 - coordination is a regular part of their day-to-day exempt activities



***How do we determine
affiliated service
group status?***

Definitions

- Affiliated Service Group (ASG) definition found in Code §414(m)
 - ASG can fall into one of three categories
 - A-Organization groups (A-Org)
 - Consists of a First Service Organization (FSO) and at least one “A organization”
 - B-Organization groups (B-org)
 - Consists of a First Service Organization (FSO) and at least one “A organization”
 - Management groups

Definitions

- FSO must be a service organization
 - Performance of services is principal business of the organization
 - As defined in Code §414(m)(3) and Proposed Treas. Reg. § 1.414(m)-2(f)
 - Organization refers to corporation, partnership or other organization

Definitions

- To be A-Org, organization must satisfy 2-part test
 - Ownership Test
 - Organization is a partner or shareholder in the FSO (regardless of ownership % in FSO)
 - Apply constructive ownership rules of Code §318(a)
 - Working Relationship Test
 - Organization regularly performs services for the FSO
 - Regularly associated with FSO in performing services for third parties
 - Facts & circumstances determines if working relationship exists

Definitions

- To be B-Org, organization must meet following requirements
 - Significant portion of its business must be performance of services for a FSO, for one or more A-Org's determined with respect to FSO, or for both

Definitions

- To be B-Org, organization must meet following requirements
 - Services must be of type historically performed by employees in service field of the FSO or the A-Org
 - 10% or more of the interests in the organization must be held, in aggregate, by persons who are HCEs of the FSO or A-Org
- B-Org need not be a service organization

Definitions

- Principal business of organization will be considered performance of services if:
 - capital is not a material income producing factor
 - gross income consists principally of fees, commissions or other compensation for personal services
- Capital is material income producing factor if substantial portion of gross income of business is attributable to employment of capital
 - i.e. investment in inventories, plant or machinery

Definitions

- Organization in one or more of the following fields is a service organization:
 - Health
 - Law
 - Engineering
 - Architecture
 - Accounting
 - Actuarial Science
 - Performing Arts
 - Consulting
 - Insurance

A-Org Example

- The Yours, Mine & Ours Partnership is a law partnership with offices nationwide. Helpers, P.C. is a Washington,, DC corporation that is a partner in the law firm. Helpers, P.C. provides paralegal and administrative services for the law firm attorneys. All employees of the corporation work directly for the corporation, and none of them work directly for any of the other offices of the law firm.

A-Org Example

- A-Org ASG needs a FSO and A-Org
- Is there an FSO?
 - FSO must be a service organization
 - By definition, a law firm is a service organization
 - Yours, Mine & Ours Partnership is the FSO

A-Org Example

- A-Org ASG needs a FSO and A-Org
- Is there an A-Org?
 - A-Org must have ownership in FSO and be regularly associated with FSO in performing services for third parties.
 - Helpers, P.C. is a partner in the law firm.
 - Helpers, P.C. provides all paralegal and administrative services for the law firm clients.
 - Helpers, P.C. is an A-Org

A-Org Example

- A-Org ASG needs a FSO and A-Org
- Yours, Mine & Ours Partnership and Helpers, P.C. are an ASG.
- The two entities must be aggregated and treated as if they are employed as a single employer for retirement plan purposes.

B-Org Example

- ABC & Associates is a financial services organization that has 9 partners with equal ownership. Each partner of ABC own 2% of the stock of DEF Corp. DEF Corp provides services to the partnership of a type historically performed by employees in the financial services field. A significant portion of the business of DEF consists of providing services to ABC.

B-Org Example

- B-Org
 - Significant portion of its business must be performance of services for a FSO
 - Provides services that are historically performed by employees in service field of the FSO
 - 10% or more of the interests in the organization must be held, in aggregate, by persons who are HCEs of the FSO

B-Org Example

- DEF Corp
 - DEF Corp provides services to the partnership of a type historically performed by employees in the financial services field
 - A significant portion of the business of DEF consists of providing services to ABC
 - The 9 partners of ABC are HCEs and own 18% of DEF

B-Org Example

- DEF Corp is a B-Org
- As ABC & Associates is a financial services firm, it is a service organization since it does not rely on capital to produce income
- ABC & Associates is an FSO
- ABC and DEF are an ASG
- Entities must be aggregated and treated as single employer for retirement plan purposes

Significant Portion

- Following substantiates significant portion of an organization on a facts and circumstances basis:
 - Service Receipts Safe Harbor Test
 - Total Receipts Threshold Test

Service Receipts Safe Harbor Test

- Performance of services for FSO, one or more A-Orgs or both is not significant if the “service receipts percentage” is less than 5%

Service Receipts Safe Harbor Test

- Service Receipts Percentage is ratio of:
 - Gross receipts of organization derived from performing services for FSO, one or more A-Orgs or both
 - Total receipts of the organization derived from performing services

Service Receipts Safe Harbor Test

- Ratio is greater of:
 - Ratio for the year for which the determination is being made
- Or
 - Ratio for the 3 year period including that year and the 2 preceding years

Total Receipts Threshold Test

- Performance of services for FSO, one or more A-Orgs or both is considered significant if “total receipts percentage” is 10% or more
- “Total receipts percentage” is calculated in same manner as “service receipts percentage” except the denominator is determined without regard to whether receipts were derived from performing services

Performance of Service Example

- The following chart details income from Happy Corp that is derived from performing both services and other business activities. The chart also details the amount of Happy Corp's total receipts and its receipts derived from performing services and its total receipts from Sad Corp as well as from all customers.



Performance of Service Example

	Origin of Income	All Customers	Sad Corp
Year 1	Services	\$100,000	\$4,000
	Total	\$120,000	
Year 2	Services	\$150,000	\$9,000
	Total	\$180,000	
Year 3	Services	\$200,000	\$42,000
	Total	\$240,000	

Performance of Service Example

- What are the Year 3 percentages?
- Service Receipts % is the greater of:
 - $\$42,000 / \$200,000 = 21.0\%$
 - or
 - $\$55,000 / \$450,000 = 12.2\%$

Performance of Service Example

- What are the Year 3 percentages?
- Total Receipts % is the greater of:
 - $\$42,000 / \$240,000 = 17.5\%$
 - or
 - $\$55,000 / \$540,000 = 10.2\%$

Performance of Service Example

- Since Total Receipts % is greater than 10% and Services Receipts % is greater than 5%, a significant portion of the business of Happy Corp is considered to be the performance of services for Sad Corp.

Attribution

- Family attribution for A-Org and B-Org ASGs

Ownership interest	Attributed to	
Spouse	Spouse	
Parent	Child	Child's age is irrelevant
Child	Parent	Child's age is irrelevant
Grandchild	Grandparent	Grandparent's interest is not attributed to grandchild

Attribution

- Attribution for organizations for A-Org and B-Org ASGs

Ownership interest	Attributed to	
From corporation to shareholder	Corporate ownership interest attributed proportionately	Only to shareholders owning at least 50% of stock
From partnership to partners	Partnership interests attributed proportionately	To all parties
From trust to beneficiaries	Trust ownership interests attributed proportionately	To all parties

Attribution

- Attribution for organizations for A-Org and B-Org ASGs

Ownership interest	Attributed to
To a corporation	Interest owned by individual owning at least 50% of corporation is attributed to the corporation
To a partnership	Interest owned by partner is attributed to the partnership
To a trust	Interest owned by trust beneficiaries is attributed to the trust

Attribution Example 1

- Owners of Geeks, Inc.
 - Sheldon – 70%
 - Leonard – 30%
- Geeks, Inc. owns 40% of Nerds Corp

Attribution Example 1

- Is there any attribution?
- Since Sheldon owns at least 50% of Geeks, Inc. he owns a proportionate share of Nerds Corp
 - Sheldon is attributed 28% of Nerds Corp (70% of 40%)
 - Leonard is not considered to own an interest in Nerds Corp since he owned less than 50% of Geeks, Inc.

Attribution Example 1

- What if Geeks, Inc. and Nerds Corp were a partnership?
- Same attribution for Sheldon
 - Leonard is attributed 12% of Nerds as there is no at least 50% rule applicable to partnerships or trusts

Attribution Example 2

- The Good Corp is a service organization. The sole function of Bad Corp is to provide services to Good Corp of a type historically provided by employees in the service field of Good Corp. Raj owns all of the stock of Bad Corp and 3% of Good Corp. He is not an HCE of Good Corp.

Attribution Example 2

- Is there an ASG if Good Corp is considered to be an FSO?
 - Bad Corp is not an A-Org because the corporation does not have an interest in Good Corp
 - Bad Corp is not a B-Org because HCEs do not own at least 10% of it
 - There is no ASG

Attribution Example 2

- Is there an ASG if Bad Corp is considered to be an FSO?
 - Good Corp is an A-Org because it has an interest in Bad Corp due to attribution from Raj and Good Corp regularly performs services for Bad Corp
 - There is an ASG

Attribution Example 3

- The FAM Partnership is owned as follows:
 - Dad - 40%
 - Son A (age 20) - 30%
 - Son B (age 30) - 20%
 - Unrelated person - 10%

Attribution Example 3

- Dad's ownership
 - Considered to own 90%
 - 40% direct ownership
 - 30% interest owned by Son A
 - 20% interest owned by Son B
 - For ASG purposes, child's age and ownership percentages of parent and child are not relevant

Attribution Example 3

- Son A's ownership
 - Considered to own 70%
 - 30% direct ownership
 - 40% interest owned by Dad
 - No sibling attribution
 - For ASG purposes, child's age and ownership percentages of parent and child are not relevant

Attribution Example 3

- Son B's ownership
 - Considered to own 60%
 - 20% direct ownership
 - 40% interest owned by Dad
 - No sibling attribution
 - For ASG purposes, child's age and ownership percentages of parent and child are not relevant

Management Organizations

- Management-type ASG exists when:
 - An organization performs management functions
 - Management organization's principal business is performing management function on a regular and continuing basis for a recipient organization
 - No need for common ownership between the two entities

Management Organizations

- Recipient organization (Code §414(m)(5)):
 - An organization for which management services are performed
 - Any organization aggregated under Code § § 414(b), 414(c), 414(m) and 414(o)
 - All related organizations
 - Need not be a service organization

Management Organization Example

- A Corp and B Corp are under common control
- C Corp and D Corp constitute an ASG
- Assume C Corp or D Corp (or both) perform management functions for A Corp or B Corp (or both)
- C Corp and D Corp are a single management organization and A Corp and B Corp are a single recipient organization

Management Organization

- Management functions
 - Only management activities and services historically performed by employees
 - Include determining, implementing or supervising
 - Daily business operations
 - Personnel
 - Employee compensation and benefits
 - Short-range and long range business planning
 - Organizational structure and ownership

Management Organization

- Code §267 attribution rules for family attribution
 - An individual is attributed interests owned by spouse, siblings, ancestors and lineal descendants
 - Not applied to partnerships and trusts

Management Organization

- Code §267 attribution rules for organizational attribution
 - The interests of a corporation, partnership, or trust are attributed proportionately to all shareholders, partners or beneficiaries
 - No minimum ownership percentage

Management Organization Example

- Jim is the sole owner and employee of Generic Medical Services, Inc.
- Dr. Ann is the sole owner and sole employee of Ann, M.D., P.C.
- Jim was formerly an employee of Ann, M.D., P.C.
- Generic Medical Services, Inc. handles the daily business operations of Ann, M.D., P.C.

Management Organization Example

- Which of these must exist to be an ASG?
 - Common ownership between Generic Medical Services, Inc. and Ann, M.D., P.C.
 - Generic Medical Services, Inc. must perform management functions to more than one recipient organization to satisfy the “principal business” test

Management Organization Example

- Which of these must exist to be an ASG?
 - The principal business of Generic Medical Services, Inc. must be the performance of management functions on a regular and continuing basis for Ann, M.D., P.C.
 - Since Jim was a former employee of Ann, M.D., P.C. and is performing essentially the same functions, as when he was employed, Generic Medical Services, Inc. is not considered a management organization

Real Life Example 1

- Typical Realty, Inc. (TPI)
 - S Corp
 - 60% owned by Anna
 - 40% owned by Katie
- Anna Capital LLC (ACL)
 - Limited Partnership
 - 99.99% owned by Anna
 - .01% owned by Typical Capital General, Inc. (Anna is sole shareholder)
- Katie Capital LLC (KCL)
 - Limited Partnership
 - 99.99% owned by Katie
 - .01% owned by XYZ Realty General, Inc. (Katie is sole shareholder)

Real Life Example 1

- ABC Maintenance, Inc. (AMI)
 - S Corp
 - 60% owned by Anna
 - 40% owned by Katie
- DEF Group, Inc. (DGI)
 - S Corp
 - 60% owned by Anna
 - 40% owned by Katie

Real Life Example 1

- ACL and KCL provide asset management services to real estate limited partnerships
- TPI provides property management services to real estate limited partnerships
- Generally, ACL, KCL and TPI provide services to same end users
 - Occasionally, one entity will perform services for an end user that does not use the services of the other organization

Real Life Example 1

- Anna and Katie take no compensation from TPI
- Anna and Katie are compensated from their LLPs
- AMI and DGI do not maintain a tax-qualified plan
- TPI sponsors 401(k) plan for its employees
 - Are there any common control issues?
 - If yes, what do they need to worry about?
- Can ACL and KCL sponsor separate plans?
 - If yes, what are the issues?

Real Life Example 1

- Controlled Group?
 - Parent-Subsidiary
 - One or more chains of corporations are connected through stock ownership with common parent
 - 80% of stock of each corporation owned by one or more corporations in the group
 - Parent must own 80% of at least one other corporation
- Parent-Subsidiary controlled group does not exist

Real Life Example 1

- Controlled Group?
 - Brother-Sister
 - Group of 2 or more corporations
 - 5 or fewer common owners
 - Common owners must include individual, trust or estate
 - Own directly or indirectly a controlling interest of each group (80%) and have effective control (50%)

Real Life Example 1

- Controlled Group?
 - Controlling Interest - Yes
 - Anna and Katie own 100% of TPI, AMI and DGI
 - Effective Control - Yes
 - Anna and Katie have 100% commonality of ownership in TPI, AMI and DGI
- TPI, AMI and DGI are under common control

Real Life Example 1

- Affiliated Service Group?
 - A-Organization groups (A-Org)
 - Consists of a First Service Organization (FSO) and at least one “A organization”
 - FSO must be a service organization
 - » Performance of services is principal business of the organization
- There is no A-Org ASG as none of the organizations perform “professional services” so there is no FSO

Real Life Example 1

- Affiliated Service Group?
 - B-Organization groups (B-Org)
 - Significant portion of its business must be performance of services for a FSO, for one or more A-Org's determined with respect to FSO, or for both
 - Services must be of type historically performed by employees in service field of the FSO or the A-Org
 - 10% or more of the interests in the organization must be held, in aggregate, by persons who are HCEs of the FSO or A-Org
 - B-Org need not be a service organization

Real Life Example 1

- Affiliated Service Group?
 - If ACL or KCL is the B-Organization and TPI is the FSO, neither ACL or KCL performs services for TPI
 - If TPI is the B-Organization and ACL or KCL is the FSO, TPI performs no services for ACL or KCL
- There is no B-Org ASG since no entity performs a significant portion of its business for a FSO

Real Life Example 1

- Affiliated Service Group?
 - Management-type ASG exists when:
 - An organization performs management functions
 - Management organization's principal business is performing management function on a regular and continuing basis for a recipient organization
 - No need for common ownership between the two entities

Real Life Example 1

- Affiliated Service Group?
 - TPI, ACL and KCL all perform management functions for real estate partnerships
 - They perform management functions for many independent organizations
 - Principal business is NOT performing management functions for a single recipient organization
 - There is NO Management ASG with respect to TPI, ACL, KCL and the real estate partnerships.

Real Life Example 2

- Sample Holdings, LLC
 - Owned by Amy and Dave who are married
 - Amy 51%
 - Dave 49%
 - Owns 100% of Quality Construction, Inc.
- Quality Construction, Inc. owns 75% of Ace Construction Services, Inc.

Real Life Example 2

- Not a controlled group
 - Quality Construction, Inc. owns less than 80% of Ace Construction Services, Inc.

Real Life Example 2

- What questions need to be answered?
 - Who else owns Ace construction Company?
 - What is the relationship between Quality and Ace?
 - Does Ace provide services to Quality?
 - Are these services normally performed by employees of the construction industry?
 - Who are Quality's HCEs?

Thank you

QUESTIONS?