

Tax-exempt financing results in a lower cost of capital for governmental or 501(c)(3) health care providers but also requires ongoing compliance with the Internal Revenue Code and associated Treasury Regulations. The introduction of Schedule K to Form 990 has recently highlighted the importance of an efficient and effective debt compliance program. In an effort to assist our clients in the development, implementation and ongoing management of such programs, Hall Render's Health Care Finance Team offers a variety of special finance counsel services.

SPECIAL FINANCE COUNSEL SERVICES:

- Developing and implementing post-issuance compliance processes, including:
 - Drafting or updating written post-issuance compliance policies to meet current IRS standards;
 - Determining and documenting historical bond-financed assets to clearly identify which assets are subject to private use restrictions; and
 - Identifying and quantifying existing private use for Schedule K reporting and general post-issuance compliance purposes.
- Rendering ongoing advice regarding private business use compliance, including review of ownership and leasing arrangements, management and service contracts and sponsored research arrangements.
- Providing review and advisory services with respect to the completion of IRS Form 990, Schedule K – Supplemental Information on Tax-Exempt Bonds.
- Planning and strategic advisory services when contemplating the tax-exempt financing or refinancing of qualified assets, particularly with respect to the identification of qualified assets and financing structures.
- Resolving existing private use or other compliance issues through remedial action or the IRS's Voluntary Closing Agreement Program (VCAP).
- Assisting health care providers with changes in use of tax-exempt financed assets, including the sale or disposition of financed assets.

WHY HALL RENDER:

- We know health care. As part of the largest health care focused law firm in the country, Hall Render's finance attorneys work with health care providers on a daily basis; you benefit from our experience and insight.
- We understand your mission. Our goal is to assist you in executing your mission in a compliant way, not simply to say "no" to any proposed action or transaction affecting tax-exempt financed assets.
- We are practical. While the applicable rules and regulations can be technical and specialized, we pride ourselves on translating dated and restrictive rules into workable arrangements and practical, actionable advice.

A well-designed debt compliance program is key to complying with the relevant rules and regulations and to empowering health care providers to implement their missions with a clear understanding of their debt portfolio. Hall Render's Health Care Finance Team is uniquely positioned to assist our clients in this effort and to do so in an efficient and cost-effective way.

For more information regarding topics related to health care, please visit www.hallrender.com.

HALL RENDER VALUE:

- Lower Your Legal Costs. Hall Render's Midwestern low-rate structure compares favorably with those of counsel in higher cost markets.
- Reduce Utilization of Bond Counsel. Utilizing Hall Render to review and structure management and service agreements, can reduce the need for higher-priced bond counsel involvement.
- Do More In-House. Our attorneys are available to train your treasury, finance, legal and other personnel. By educating those "in the trenches" you can reduce the need for outside counsel and improve the efficiency of outside counsel when necessary.
- Leverage Industry Experience. Our Health Care Finance attorneys are involved in professional groups that define industry standards for health care finance. Moreover, our large health care client base provides Hall Render with industry insight and experience that benefits all our clients.
- Streamline Financings. In our role as special finance counsel, Hall Render develops a detailed understanding of your operations and financing history. This integration, along with our experience, allows for a more efficient and cost-effective representation in connection with new financing or refinancing transactions.