

IMPACT Enrollment Job Aid: Ownership

Updated 09/22/26



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OUR VISION FOR THE FUTURE

We improve lives.

- ▶ We address social and structural determinants of health.
- ▶ We empower customers to maximize their health and well being.
- ▶ We provide consistent, responsive service to our colleagues and customers.
- ▶ We make equity the foundation of everything we do.

This is possible because:

▶ **We value our staff as our greatest asset.**

We do this by:

Fully staffing a diverse workforce whose skills and experiences strengthen HFS.

Ensuring all staff and systems work together.

Maintaining a positive workplace where strong teams contribute, grow and stay.

Providing exceptional training programs that develop and support all employees.

▶ **We are always improving.**

We do this by:

Having specific and measurable goals and using analytics to improve outcomes.

Using technology and interagency collaboration to maximize efficiency and impact.

Learning from successes and failures.

▶ **We inspire public confidence.**

We do this by:

Using research and analytics to drive policy and shape legislative initiatives.

Clearly communicating the impacts of our work.

Being responsible stewards of public resources.

Staying focused on our goals.

IMPACT Enrollment Job Aide: Ownership

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Who should be listed in the Ownership Step?



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Who should be listed in the Ownership Step?

1

Any individual or entity that directly or indirectly owns 5% or more of the business.

2

Any individual who meets the definition of a managing employee. See below for definition of managing employee.

3

If the business is incorporated, any individual that is on the Board of Directors.

TIP: Managing employees must always be listed – even if they don't directly or indirectly own at least 5% of the business



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Reporting Owner Information

1. Why does IMPACT need this information?

This information is required to be disclosed per CMS regulation, as part of transparency requirements outlined in the Affordable Care Act.

[CFR Ownership Disclosure Requirements](#)

2. Is IMPACT secure?

Access to IMPACT data is secured through ILogin and Okta single sign-on and multi-factor authorization identity proofing. More information about IMPACT security features can be found here:

[Provider Notice Issued 3/14/2022](#)

<https://iloginhelp.illinois.gov/>

Definitions

- Disclosing Entity
- Ownership Interest
- Indirect Ownership Interest
- Person with Ownership or Controlling Interest
- Managing Employee
- Non-Profit Entities
- Government-Owned Entities





Disclosing Entity

The entity that is enrolling/modifying their enrollment.

This is the organization the enrollment belongs to.





Ownership Interest

The possession of equity in the capital, the stock, or the profits of the disclosing entity

Also described as “Direct” ownership interest



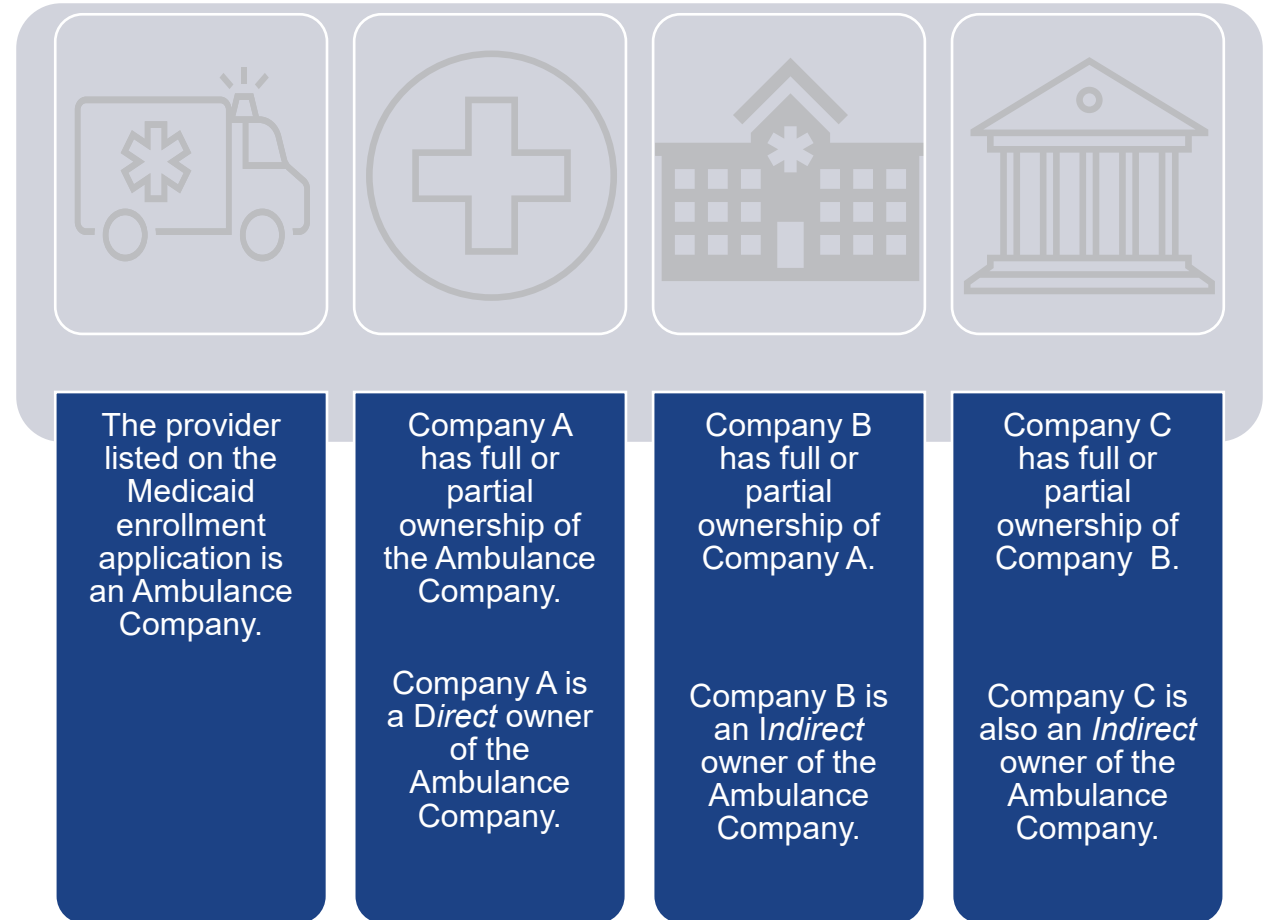
Indirect Ownership Interest

An ownership interest in an entity that has an ownership interest in the disclosing entity.

This term includes an ownership interest in any entity that has an indirect ownership interest in the disclosing entity.

A *direct* owner has an actual ownership interest in the provider, whereas an *indirect* owner has an ownership interest in an organization that owns the provider.

For Example:



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Person with Ownership or Controlling Interest

A person that has interest of 5% or more in the disclosing entity through *any* of the following:

Direct ownership interest

Indirect ownership interest

A combination of direct and indirect ownership interest

Ownership of 5 percent or more in any mortgage, deed of trust, note, or other obligation secured by the disclosing entity

An Officer or Director role with a disclosing entity that is organized as a corporation

Partnership in a disclosing entity that is organized as a partnership



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Managing Employee

A general manager, business manager, administrator, director, or other individual who exercises operational or managerial control over, or who directly or indirectly conducts, the day-to-day operation of an institution, organization, or agency.

There are not exceptions to the managing employee disclosure requirement. To the extent any individual meets the definition of “managing employee” under § 455.101, their information is required to be disclosed.





Non-Profit Entities

Non-profit entities generally do not have owners unless state law permits such ownership.

However, **managing employees** in a Non-Profit entity would have to be disclosed.

In addition, all entities that are organized as **corporations** must provide disclosures regarding their officers and directors.

Also, if a Non-Profit corporation has “trustees” instead of officers or directors, these trustees must be disclosed.



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Government-Owned Entities

For purposes of enrollment, a government-owned entity (GOE) exists when a particular government body (e.g., Federal, State, city or county agency) will be legally and financially responsible for Medicaid payments received.

All officers and directors must be disclosed, regardless of their number (e.g., 100 board members) and even if they serve in a voluntary (e.g., unpaid) capacity. If a non-profit corporation has “trustees” instead of officers or directors, these trustees must be disclosed.

There is no exception to the managing employee disclosure requirement for GOEs. GOEs must disclose anyone meeting the definition of **managing employee**. GOEs would only need to disclose board members if organized as a **corporation** or if a board member meets the definition of **managing employee**.



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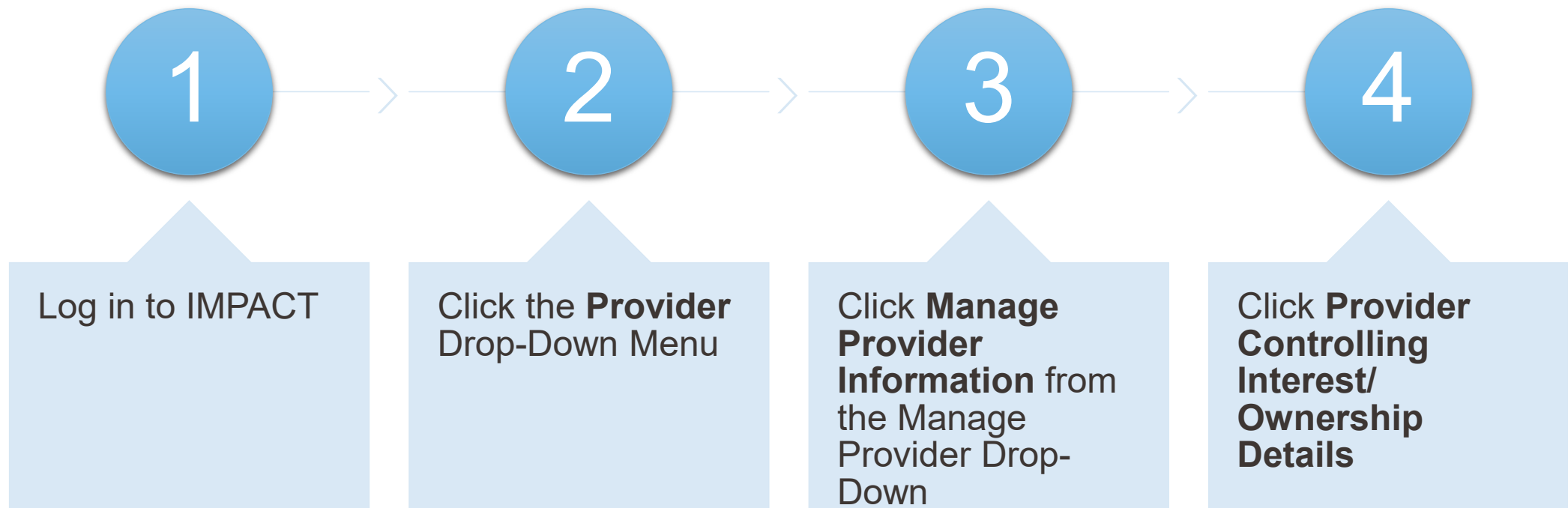
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Adding a New Owner



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Adding a New Owner: Step by Step



Adding a New Owner: Step by Step

5

Click **Add Owner** and complete the required fields indicated by the asterisk (*).

- Owner Type: click the drop-down arrow and select the appropriate ownership type, e.g. Entity-Direct or Indirect, Entity or Individual-Managing Employee, Individual-Direct or Indirect, or Individual-Board of Directors.
- Percentage Owned: enter the percentage owned for owner(s).

6

Owner Information
Select OK in bottom right corner.

Identifying Information:

First and Last Name, Social Security Number, Phone number, Date of Birth, Email address

Address:

Enter owner's residential street address in line 1 and zip code in zip code box, then click **Validate Address**. The system will auto populate the city, state, and county.

Per federal guidelines address line 1 must be residential and cannot be a P.O. Box. **If you have a P.O. Box, you will list that in address line 3.**

Start and End Dates:

Start date → The date you are adding the owner.

End date → Leave this field blank. This field will auto populate with 12/31/2999.

Adverse Action:

Select Yes or No. If yes, explain in the comment field.



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Adding a New Owner: Step by Step

- 7 Once all owners have been added, click on **Manage Relationships**.
 - a. Click on the arrow (>) next to each owner to open the relationship section for each owner.
 - b. Select the appropriate relationship status for each owner in the drop down, then click Save. Options are None, Child, Parent, Sibling or Spouse.
 - c. Click Save. When finished, the Relationship Status column for that owner will say Completed.

NOTE: This step must be completed for *each owner separately*. As you complete this process you will identify each owner's relationship to all other owners.

- 8 **Complete steps 13 and 14** to submit your modification for review.

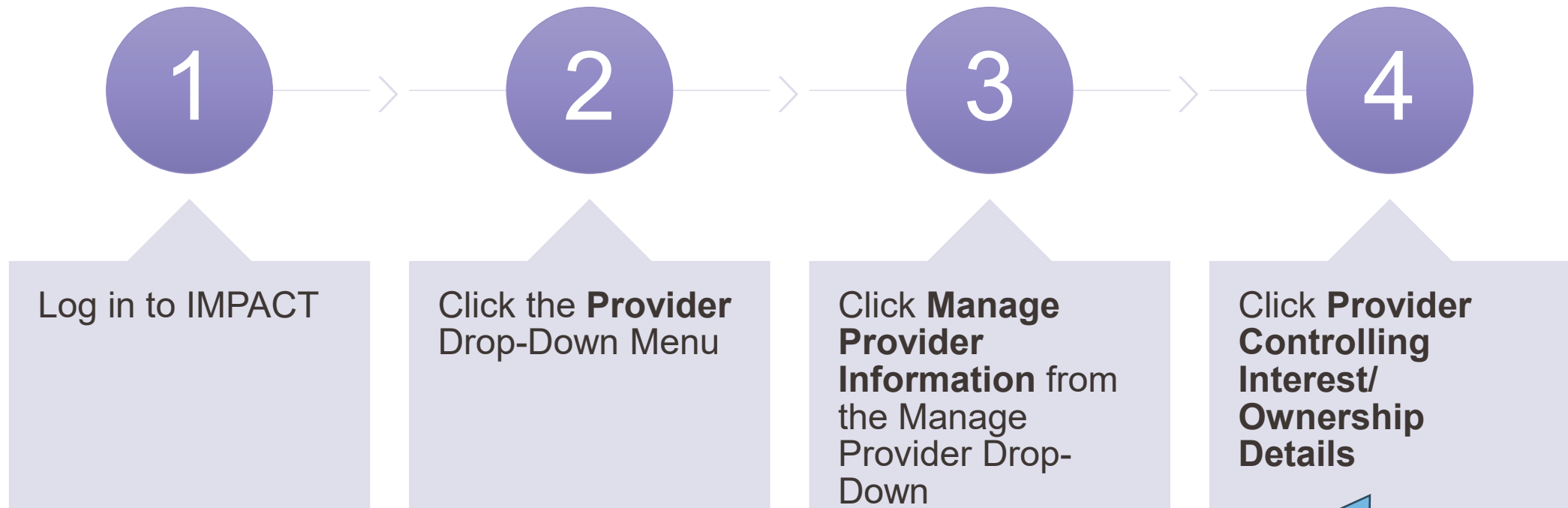


Changing an Existing Owner



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Changing an Existing Owner: Step by Step



Once you click here, you will see a list of owners that have previously been added.





Changing an Existing Owner: Step by Step

- 5 Click on the blue hyperlink of the EIN/TIN/SSN of current owner/type listed.
- 6 Go to the End Date field and enter the date you are submitting the modification.
- 7 Click Save. Then, click Close.

There will be 2 lines displayed for the owner. One will say “In Review” and the other will say “Approved”. Once the modification is processed, the “In Review” line will disappear, and show “Approved” line only .
- 8 Follow directions for Adding a New Owner if needed.

Need Help?

If you have additional questions about completing the ownership step in your IMPACT application:

- Call 1-877-782-5565 and speak to an enrollment specialist, or
- Email the MTAC Team for assistance at:
 - OMI.IMPACT@uillinois.edu
 - Info.mtac@uillinois.gov

