

HHSC Related-Party Transaction Documentation Checklist

A structured review tool for identifying relationships, documenting transactions, and assembling support before amounts are included in a cost report or financial-compliance submission.

Provider legal name _____	Program / service _____
Reporting period _____	Prepared by _____
Management reviewer _____	Review date _____

Identification comes before measurement

First determine whether ownership, control, family, management, shared personnel, common facilities, or another relationship exists. Then evaluate each transaction under the current program instructions and applicable rules. A market-rate invoice alone does not resolve every reporting question.

1. Identify potentially related parties

- ☐ Owners, officers, directors, partners, members, key management, and immediate or extended family relationships relevant under the applicable instructions.
- ☐ Parent, subsidiary, brother-sister, commonly controlled, affiliated, management, leasing, staffing, pharmacy, therapy, transportation, or purchasing entities.
- ☐ Entities using common employees, office space, equipment, bank accounts, vendors, systems, or administrative personnel.
- ☐ Individuals or organizations able to influence pricing, terms, selection, operations, or financial decisions.
- ☐ Formerly related entities or changes in ownership or control occurring during the reporting period.

2. Build the transaction inventory

- ☐ List every related-party payment, charge, reimbursement, receivable, payable, loan, contribution, distribution, asset transfer, lease, or service arrangement.
- ☐ Reconcile the inventory to general-ledger accounts, vendor activity, payroll, intercompany accounts, and year-end balances.
- ☐ Identify the nature, date, amount, frequency, program, location, and financial-statement or cost-report line affected.
- ☐ Document transactions that were netted, recorded through journal entries, paid by another entity, or allocated through a central office.

3. Assemble relationship and transaction support

- ☐ Ownership records, organizational charts, governing documents, family or control relationship description, and changes during the year.
- ☐ Executed agreements describing services, responsibilities, pricing, payment terms, renewal, and termination provisions.
- ☐ Invoices, payroll records, time support, purchase documents, proof of payment, and evidence that the goods or services were received.
- ☐ Cost records or other evidence needed to evaluate the amount eligible for reporting under the applicable instructions.
- ☐ Comparable quotes, appraisals, market information, or procurement documentation when relevant to management's review.

4. Evaluate reporting and disclosure

- ☐ Determine whether the transaction is allowable, allocable, reasonable, necessary, properly classified, and supported under the current program instructions.
- ☐ Identify any limitation based on the related organization's cost, another applicable ceiling, or a program-specific reporting rule.
- ☐ Separate capital purchases, financing components, markups, management fees, owner compensation, and other elements requiring distinct analysis.
- ☐ Confirm the allocation method for shared related-party costs and reconcile allocated amounts to the underlying source records.
- ☐ Record book-to-report adjustments and retain the calculation supporting the amount reported, excluded, or reclassified.
- ☐ Complete all applicable related-party disclosures and ensure descriptions agree across the report, financial statements, contracts, and supporting schedules.

5. Management review and retention

- ☐ A knowledgeable reviewer has confirmed that the related-party population is complete.
- ☐ The final schedule agrees to the trial balance, general ledger, intercompany balances, and filed report.
- ☐ Unusual terms, unpaid balances, retroactive agreements, unsupported allocations, and material changes from the prior year are resolved.
- ☐ Management has approved the conclusion for each material transaction and understands the representations included in certification.
- ☐ The final relationship analysis, transaction schedule, source support, calculations, disclosures, and reviewer sign-off are retained together.

Related-party transaction log

Party	Relationship	Transaction	Book amount	Reported amount	Support / conclusion

Official sources to verify

- HHSC Provider Finance Department
- HHSC Cost Report Information
- HHSC Program-Specific Instructions and Resources
- HHSC STEPS Transition Information

Need help preparing for Texas HHSC financial reporting?
JConner provides cost-reporting, accounting-readiness, and independent CPA services. [Visit jconnerpc.com](#) to learn more or schedule a consultation.

Educational-use disclaimer. This resource provides general educational information. It is not legal advice, an HHSC determination, or a substitute for the current rules, reporting instructions, contract terms, training requirements, or written directions that apply to a particular provider, program, and reporting period. HHSC may require additional information.