



TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

July 31, 2008

MEMORANDUM FOR MANAGER, EO DETERMINATIONS  
MANAGER, EO DETERMINATIONS QUALITY ASSURANCE

FROM: Robert Choi \s\ *Robert Choi*  
Director, EO Rulings and Agreements

SUBJECT: Donor Advised Funds

The purpose of this memorandum is to transmit guidelines for processing Form 1023 applications for recognition of exemption under IRC 501(c)(3) submitted by sponsoring organizations that maintain donor advised funds. The guidelines are set forth in the attachments to this memorandum, as described below:

1. Donor Advised Funds Guide Sheet
2. Donor Advised Funds Guide Sheet Explanation

The content of this memorandum and the attachments will be incorporated into IRM 7.20.8, Exempt Organizations Determination Letter Processing, Special Determination Issues.