

**Internal Revenue Service**  
P.O. Box 2508  
Cincinnati, OH 45201

**Department of the Treasury**

Number: **201833031**  
Release Date: 8/17/2018

**Employer Identification Number:**

**Contact person - ID number:**

**Contact telephone number:**

**Date:** May 22, 2018

**LEGEND**

**UIL: 4945.04-04**

v dollars = Amount  
w dollars = Amount  
X = Program  
Y = Company  
Z = Company

Dear \_\_\_\_\_ :

You asked for advance approval of your employer-related scholarship grant procedures under Internal Revenue Code Section 4945(g). This approval is required because you are a private foundation that is exempt from federal income tax. You requested approval of your scholarship program to fund the education of certain qualifying students.

**Our determination**

We approved your procedures for awarding employer-related scholarships. Based on the information you submitted, and assuming you will conduct your program as proposed, we determined that your procedures for awarding employer-related scholarships meet the requirements of Code Section 4945(g)(1). As a result, expenditures you make under these procedures won't be taxable.

Also, awards made under these procedures are scholarship or fellowship grants and are not taxable to the recipients if they use them for qualified tuition and related expenses (subject to the limitations provided in Code Section 117(b)).

**Description of your request**

Your letter indicates you will operate an employer-related scholarship program called X. The purpose of X is to establish and operate an educational scholarship program for the employees of, and the dependents of the employees of, Y.

You initially plan to offer four scholarships in the amount of v dollars to eligible employees of Y and two scholarships in the amount of w dollars to dependent children of eligible employees of Y. You will determine by the end of each calendar year the number and