Department of the Treasury Internal Revenue Service
Tax Exempt and Government Entities

Date:
08/18/2026
Taxpayer ID number:

Person to contact:
Name:
ID number:
Telephone:

Release Number: 202646017
Release Date: 11/13/26

LEGEND
B = Program
C = Disease
D = Entity
E = Number
F = Number
G = Board
w dollars = dollar amount
y dollars = dollar amount

UIL: 4945.04-04

Dear :

You asked for advance approval of your educational grant procedures under Internal Revenue Code (IRC) Section 4945(g)(3).

This approval is required because IRC Section 4945 provides for the imposition of taxes on each taxable expenditure of a private foundation. IRC Section 4945(d)(3) provides that the term "taxable expenditure" includes any amount paid or incurred by a private foundation as a grant to an individual for travel, study, or similar purposes by the individual, unless the grant satisfies the advance approval requirement of IRC Section 4945(g).

Our determination
We approved your procedures for awarding educational grants. Based on the information you submitted, and assuming you will conduct your program as proposed, we determined that your procedures for awarding educational grants meet the requirements of IRC Section 4945(g)(3). As a result, expenditures you make under these procedures won't be taxable.

Description of your request
Your letter indicates you will operate an educational grant program referred to as the B. The purpose of the B is to advance the science, understanding, and possible cure of C, a form of cancer.

You will accomplish your purpose by funding travel to collaborating laboratories within the D research community, which primarily consists of laboratories at universities and hospitals that have received grants from your other funding programs. The B will enable hands-on training, provide access to unique technologies or reagents, and facilitate the analysis and exchange of data to foster deeper scientific engagement and accelerate

research progress.

During your first year, you anticipate awarding approximately E grants worth up to w dollars each for a total of y dollars. Grants will be used to pay for travel expenses incurred while visiting collaborating laboratories.

You will publicize your grants through your website, announcements at D annual summit meetings, as well as to the greater C community, including universities, hospitals, and other research institutions. You estimate up to F applicants will be eligible to apply each year based on the number of laboratories you have funded in the past. You will close applications for the calendar year once you award your available number of grants.

Your grant is open to researchers at any career stage, such as students, technicians, post-doc, staff scientists, or principal investigators, who meet the following requirements:

- the home laboratory of the researcher and destination laboratory are both in the U.S.A.;
- either the researcher from the home laboratory or the destination laboratory have received grants through your various funding programs in the past; and
- no one from the applicant's home laboratory has received a B grant from you during the calendar year.

Eligible applicants must submit a completed application form that includes:

- a written statement describing the purpose and specific goals of the research;
- an explanation as to why the travel is necessary to achieve these goals;
- the proposed length of time and estimated budget for the travel; and
- letters of support from a director or principal investigator of both the home and destination laboratories, communicating the commitment of both to provide sufficient space, time, and resources to accomplish the proposed research.

Your selection committee will consist of your president and the chair of your G, who possess the scientific and medical expertise to evaluate applications based on merit in a fair and impartial manner. Your committee will evaluate the feasibility and scientific merit of the proposed research and the level of commitment from the letters of support. Applicants will then be ranked and grant award recommendations will be sent to your board of directors. Your trustees will make final grant awards and may exercise discretion to decline to fund one or more recommended grant recipients. Approved grantees will be notified of their selection by email.

Grant funds will be provided after completion of travel based on actual expenses incurred; a reimbursement form with original receipts must be submitted, along with a one-page report describing the outcome of the trip and explaining whether the research goals were achieved.

Grants will not be renewable, but grantees may apply for future grants under the B. However, submission of an unsatisfactory report, incomplete report, or failure to abide by your travel policy may adversely impact a grantee's ability to apply for and secure future grants.

You represent that you will complete the following:

- Arrange to receive and review grantee reports annually and upon completion of the purpose for which the grant was awarded,
- Investigate diversion of funds from their intended purposes,
- Take all reasonable and appropriate steps to recover the diverted funds and ensure other grant funds held by a grantee are used for their intended purposes, and
- Withhold further payments to grantees until you obtain grantees' assurances that future diversions will not occur and that grantees will take extraordinary precautions to prevent future diversion from occurring.

You also represent that you will:

- Maintain all records relating to individual grants including information obtained to evaluate grantees,
- Identify a grantee is a disqualified person,
- Establish the amount and purpose of each grant, and
- Establish that you undertook the supervision and investigation of grants described above.

Basis for our determination

IRC Section 4945 imposes excise taxes on the taxable expenditures of private foundations. A taxable expenditure is any amount a private foundation pays as a grant to an individual for travel, study or other similar purposes. However, a grant that meets all the following requirements of IRC Section 4945(g) is not a taxable expenditure.

- The foundation awards the grants on an objective and nondiscriminatory basis.
- The IRS approves in advance the procedure for awarding the grant.
- The grant is:
  - A scholarship or fellowship subject to IRC Section 117(a) and is to be used for study at an educational organization described in IRC Section 170(b)(1)(A)(ii); or
  - A prize or award subject to the provisions of IRC Section 74(b), if the recipient of the prize or award is selected from the general public; or
  - To achieve a specific objective; produce a report or similar product; or improve or enhance a literary, artistic, musical, scientific, teaching, or other similar skill or talent of the recipient.

To receive approval of its educational grant procedures, Treasury Regulation Section 53.4945-4(c)(1) requires that a private foundation show:

- The grant procedure includes an objective and nondiscriminatory selection process.
- The grant procedure results in the recipients performing the activities the grants were intended to finance.
- The foundation plans to obtain reports to determine whether the recipients have performed the activities that the grants were intended to finance.

Other conditions that apply to this determination

- This determination only covers the grant program described above. This approval will apply to succeeding grant programs only if their standards and procedures don't differ significantly from those described in your original request.
- The effective date of our approval is which is the date your request was submitted.

- This determination applies only to you. It may not be cited as a precedent.
- You cannot rely on the conclusions in this letter if the facts you provided have changed substantially. You must report any significant changes to your program to the IRS at:

  Internal Revenue Service
  Exempt Organizations Determinations
  TE/GE Stop 31A Team 105
  P.O. Box 12192
  Covington, KY 41012-0192
- You can't award grants to your creators, officers, directors, trustees, foundation managers, or members of selection committees or their relatives.
- All funds distributed to individuals must be made on a charitable basis and further the purposes of your organization. You cannot award grants for a purpose that is inconsistent with IRC Section 170(c)(2)(B).
- You should keep adequate records and case histories so that you can substantiate your grant distributions with the IRS if necessary.

We'll make this determination letter available for public inspection after deleting personally identifiable information, as required by IRC Section 6110. We've enclosed Letter 437, Notice of Intention to Disclose - Rulings, and a copy of the letter that shows our proposed deletions.

- If you disagree with our proposed deletions, follow the instructions in the Letter 437 on how to notify us.
- If you agree with our deletions, you don't need to take any further action.

Please keep a copy of this letter in your records.

If you have questions, you can contact the person shown at the top of this letter.

Sincerely,

Stephen A. Martin
Director, Exempt Organizations
Rulings and Agreements

Enclosures:
Letter 437