April 2017

To Whom It May Concern:

The accompanying correspondence from the Internal Revenue Service confirms that the University of Cincinnati (“UC”) is not subject to federal income tax, as an instrumentality of the State of Ohio, under Internal Revenue Code section 115.

The IRS letter also confirms that donors may claim tax deductions for their donations to UC, under Internal Revenue Code section 170.

The IRS letter also confirms that grant-making organizations who qualify under section 501(c)(3) may make grants to UC without jeopardizing their own tax-exempt status.

Although the IRS correspondence is from 1991, UC’s status as an instrumentality of the State of Ohio has not changed since that time, as confirmed by the Internal Revenue Service during their most recent audit of the University.

While not addressed explicitly in the IRS letter, UC also qualifies under Internal Revenue Code section 509(a)(1) as an organization other than a “private foundation” because:

- UC is “described in section 501(c)(3)” as “organized and operated exclusively for…scientific…or educational purposes”; and
- UC is “described in section 170(b)(1)(A)(ii)” as an educational organization.

Sincerely,

Barry L. Holland
Director, Tax Compliance

attachment
Dear Sir or Madam:

This is in response to your recent request for an exemption letter for your organization.

We have no record of having issued a determination with respect to this matter. However, your letter indicates that you are a governmental instrumentality or a political subdivision of a state.

Governmental instrumentalities and political subdivisions of states are not subject to Federal income tax because they are described in section 115 of the Internal Revenue Code of 1986.

Governmental instrumentalities and political subdivisions of states may receive donations which are tax deductible to the donors under section 170(c) of the Code.

Organizations which are described in section 501(c)(3) of the Code may make grants to governmental instrumentalities and political subdivisions of states. Such grants do not jeopardize the exempt status of the grantors because section 170(b)(1)(A)(v) of the Code provides that governmental instrumentalities and subdivisions of states are not private foundations.

If you have any questions on this matter, please call me at the telephone number shown above.

Sincerely yours,

[Signature]

Harold M. Browning
District Director