

something else's, or are abandoned by the applicant. Less than 1% receive denials.

~~You'll probably receive an advance ruling, via a copy of IRS Form Letter 1045. If you're among those who successfully apply for a definitive ruling, it'll be Form Letter 947. Letters of recognition are surprisingly barebones, as you can see by the examples provided on the S/S website. But these are important and valuable documents. Scan your letter, and then put the original in your safe deposit box with your other important papers.~~

~~Advance Ruling Follow-ups~~

~~New organizations claiming to be public charities ordinarily receive advance rulings, because they simply have not been around long enough to accumulate the donor history required to demonstrate that they are publicly supported. As mentioned above, the IRS will begin with a presumption that your organization is a private foundation. It then falls to you to make your case that you are a public charity, not a private foundation.~~

~~The practical definitions of "private foundation" and "public charity" are given above. The IRS, however, relies on Section 509(a)(1) and Section 170(b)(1)(a), or Section 509(a)(2) of the Code. This is mentioned here because the advance ruling follow-up form, IRS Form 8734, *Support Schedule for Advance Ruling Period*, addresses these sections when asking you to evaluate your public support experience. Confusingly, the IRS defines what a public charity is by saying what a private foundation is not and, of course, that definition is verbose and convoluted with referrals to subparagraphs and other sections of the Code. No explanation is provided regarding the differences between Section 509(a)(1) / 170(b)(1)(a) organizations and 509(a)(2) organizations.~~

~~These organizations both qualify as public charities, except that 509(a)(2)'s are organizations that ordinarily receive some form of compensation for the services they perform. These are therefore sometimes called "service provider" charities. Examples might include symphony orchestras, amateur theater companies, children's camps, drug rehabilitation centers, hospice organizations, and others whose primary mission is to provide a service for which a fee is ordinarily charged. Most small nonprofits, therefore, qualify under Section 509(a)(1) and Section 170(b)(1)(a), rather than under Section 509(a)(2).~~

~~Form 8734 seeks to verify your status by evaluating your experience during your five-year advance ruling period. Ideally you'll be able to show that you meet the one-third test on Line 12. If not, but your public support~~