

The Global Academy of Holistic Nursing was accepted as a 501(c)3 organization with the designation of a 509(a)2 status. A clip that clarify the meaning of this designation. A copy of the acceptance letter follows.

Clip from <https://www.501c3.org/509a1-vs-509a2-nonprofit/>

### **Public Charity Status**

In the world of 501(c)(3) organizations, the public charity is the kind that first comes to mind for most people. It is typically the type of nonprofit that actively conducts programs that provide a charitable impact to its chosen community.

But, not all public charities are the same. The IRS sub-classifies many based on their purpose. For example, there is a specific sub-classification of public charity status that is exclusively for churches. There is another one for schools, and yet another for charity hospitals, and so on. For those who really like details, here's the breakdown of the most common examples:

- Churches and associations of churches – 509(a)(1) and 170(b)(1)(A)(i)
- Schools – 509(a)(1) and 170(b)(1)(A)(ii)
- Hospitals and similar orgs – 509(a)(1) and 170(b)(1)(A)(iii)
- Supporting organization – 509(a)(3)
- Testing for public safety – 509(a)(4)

**So what about a 501(c)(3) public charity that isn't so specific** that it falls under one of the above sub-classifications? These are nonprofits with less laser-focused purposes, such as general education, arts, youth sports, assisting the poor, etc. Far more 501(c)(3) public charities fall under this fuzzier description than those listed above.

With these, the IRS sub-classifies them by source of revenue, specifically those that receive most of their revenue from donor support, and those that receive a combination of donor support, program revenue, and investment income. They are sub-classified as a 509(a)(1) and 170(b)(1)(A)(vi) public charity and a 509(a)(2) organization respectively.

### **Revenue Source: Contributions, Program Revenue, and Investments - 509(a)(2) Status**

A public charity recognized under sub-section 509(a)(2) is one that, normally receives not more than one-third of its financial support from gross investment income and receives more than one-third of its financial support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions).

Similar to the 509(a)(1), a 509(a)(2) likely receives donation support. In addition, a portion of its revenue comes from investment income (limited to 33% of total income), membership dues, and/or program revenue, the latter being money earned from the sale of goods and/or services that are directly related to the nonprofit's exempt purpose.



Department of the Treasury  
Internal Revenue Service  
Tax Exempt and Government Entities  
P. O. Box 2508  
Cincinnati, OH 45201

GLOBAL ACADEMY OF HOLISTIC NURSING  
ASSOCIATION  
2900 SW PLASS COURT  
TOPEKA, KS 66611-1980

Date:  
08/05/2021  
Employer ID number:  
85-3073708  
Person to contact:  
Name: Customer Service  
ID number: 31954  
Telephone: (877) 829-5500  
Accounting period ending:  
December 31  
Public charity status:  
509(a)(2)  
Form 990 / 990-EZ / 990-N required:  
Yes  
Effective date of exemption:  
January 30, 2021  
Contribution deductibility:  
Yes  
Addendum applies:  
No  
DLN:  
26053492003031

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to [www.irs.gov/charities](http://www.irs.gov/charities). Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

Sincerely,

Stephen A. Martin  
Director, Exempt Organizations  
Rulings and Agreements

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