

An organization formed to promote equal rights for women by investigating instances of discrimination in employment and to aid women in recognizing and dealing with discrimination qualifies for exemption under section 501(c)(3) of the Code.

Advice has been requested whether an organization that otherwise qualifies for exemption from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954 is operated for charitable and educational purposes by reason of the activities described below.

The organization was formed to promote equal rights for women, primarily in connection with employment and other economic opportunities. It studies employment conditions and conducts investigations in instances where discrimination on the basis of sex appears to be present. Its evaluations of employment practices and recommendations for eliminating discrimination are published and distributed free of charge to guide employers in establishing and maintaining equal employment opportunities for women. It does not promote, support, or engage in economic boycotts, reprisals, or picketing.

The organization also undertakes studies of the rights and protections afforded women as employees. It publishes a handbook and numerous pamphlets explaining the rights of women employees under Federal, state, and local laws and provides free counselling services to women whose rights are disregarded. In addition, it conducts seminars, meetings, and other activities designed to educate women about discrimination and other common problems they face as women with respect to their socioeconomic image in society. No part of the organization's activities consists of carrying on propaganda or otherwise attempting to influence legislation.

The organization charges nominal fees for some of its publications. Its primary source of support is from public contributions and grants.

Section 501(c)(3) of the Code provides for exemption from Federal income tax of organizations organized and operated exclusively for charitable or educational purposes.

Section 1.501(c)(3)-1(d)(2) of the Income Tax Regulations defines the term 'charitable' as including the promotion of social welfare by organizations designed to eliminate prejudice and discrimination.

Section 1.501(c)(3)-1(d)(3) of the regulations defines the term 'educational' as including the instruction of the public on subjects useful to the individual and beneficial to the community.

By investigating instances of apparent discrimination and

disseminating its findings, and by counselling women as to available remedies, the organization is attempting to eliminate prejudice and discrimination. By publishing guidelines for employers and providing publications and activities designed to aid women in recognizing and dealing with discrimination, the organization is instructing the public on subjects useful to the individual and beneficial to the community.

Accordingly, it is held that the organization's activities are charitable and educational and, since it otherwise qualifies for exemption, it is held that the organization is exempt from Federal income tax under section 501(c)(3) of the Code.

Even though an organization considers itself within the scope of this Revenue Ruling, it must file an application on Form 1023, Exemption Application, in order to be recognized by the Service as exempt under section 501(c)(3) of the Code. The application should be filed with the District Director of Internal Revenue for the district in which is located the principal place of business or principal office of the organization. See section 1.501(a)-1 of the regulations.