MT. DIABLO UNIFIED SCHOOL DISTRICT
JAMES W. DENT EDUCATION CENTER
Fiscal Services
1936 Carlotta Drive
Concord, CA 94519-1397
Phone (925) 682-8000

July 10, 2026

To Whom It May Concern:

Deductibility:

Mt. Diablo Unified School District is a Local Educational Agency (a local government). Contributions made directly to this school district would be deductible under certain circumstances as described below. The Internal Revenue Code Section 170(c) states charitable contributions include contributions or gifts to or for the use of:

> "A State, a possession of the United States, or any political subdivision of any of the foregoing, or the United States or the District of Columbia, but only if the contribution or gift is made exclusively for public purposes."

Under Internal Revenue Code Section 103, a political subdivision is defined as:

> "Any division of any state or local government unit which is a municipal corporation ... "

Internal Revenue Service Form 1040 Schedule A instructions state that "you may deduct contributions or gifts you gave to ... Federal, state, and local governments if the gifts are solely for public purposes". IRS Publication 526 likewise states that contributions to local governments are deductible as charitable contributions when made solely for public purposes.

Contributions (cash, real, and/or personal property) are deductible if the contributor specifies that:

1. The contribution be used "for exclusively public purposes" and
2. The donor does not receive any substantial benefit in return for the contribution.

The Internal Revenue Code may limit the percentage of charitable deductions allowed in certain circumstances. Please consult your tax advisor if you have additional questions.

Tax Exempt Status:

Government entities are frequently asked to provide a tax-exempt number or "determination" letter to prove its status as a "tax-exempt" or charitable entity. For example, applications for grants from a private foundation or a charitable organization generally require this information as part of the application process. In addition, donors frequently ask for this information as substantiation that the donor's contribution is tax deductible, and vendors ask for this to substantiate that the organization is exempt from sales or excise taxes.

There is no tax exempt number provided by the Internal Revenue Service to governmental entities.

Some private foundations require grant applicants to submit a letter from the Internal Revenue Service determining them to be exempt under section 50l(c) (3) and classified as a non-profit entity. Such a letter, or an underlying requirement that a grantee be a public charity, is not legally required when the prospective grantee is a governmental unit and the grant is for qualifying (public or charitable) purposes.

Under the Foundation and Similar Excise Tax Regulations, grants to governmental units for public purposes are "qualifying distributions" under section 53.4942(a)-3(a) of the regulations; and, if they are for charitable purposes, will not be taxable expenditures, under section 53.4945-6(a) of the regulations. Per the Internal Revenue Service, most grants to governmental units will qualify as being for charitable as well as public purposes.

Sincerely,

Brenda Barbera

Brenda Barbera
Director of Budget, Accounting and Fiscal Compliance
Mt. Diablo Unified School District

CC: Adrian Vargas, Chief Business Official