Scholarship Documentation Requirements

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Related Program: 13GEM Sporting Scholarship Opportunity Program
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Approved By: Jacob Echevarria
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1. Purpose

The purpose of this policy is to establish reasonable, consistent, and privacy-conscious documentation requirements for the **13GEM Sporting Scholarship Opportunity Program**.

Documentation is used to verify material facts necessary to determine scholarship eligibility while avoiding unnecessary collection of private family information.

The objective is:

Reliable verification without unnecessary intrusion.

2. Governing Documentation Principle

All scholarship documentation requirements are governed by the principle:

Documentation Should Be Proportional.

13GEM Sporting will request only documentation reasonably necessary to:

- Verify household size;
- Verify countable household income;
- Verify child support actually received;
- Verify a claimed hardship;
- Resolve a legitimate material discrepancy; or
- Answer another material question affecting scholarship eligibility.

Documentation should not be requested merely because it exists or might be interesting to review.

3. Least Intrusive Reasonable Documentation

When multiple forms of documentation can reasonably verify the same fact, 13GEM Sporting should generally accept the **least intrusive documentation sufficient to answer the eligibility question**.

Applicants should not be required to disclose their entire financial, medical, employment, or family history to obtain a modest scholarship.

4. Documentation Is a Means of Verification

Documentation is intended to verify information relevant to scholarship eligibility.

It is not intended to:

- Investigate a family's lifestyle;
- Evaluate personal spending choices;
- Judge whether a family is sufficiently frugal;
- Conduct a comprehensive financial audit;
- Investigate unrelated family circumstances; or
- Collect sensitive information that does not materially affect eligibility.

5. No Universal Document Checklist

Not every applicant will need to provide the same documents.

Documentation should reflect:

- The family's income sources;
- Employment circumstances;
- Household circumstances;
- Whether income is regular or variable;
- Whether self-employment exists;
- Whether child support is received;
- Whether a hardship is claimed; and
- Whether a material eligibility question requires clarification.

A document that is appropriate for one household may be unnecessary for another.

6. Standard Scholarship Documentation

For a Standard Scholarship application, documentation should ordinarily be limited to what is reasonably necessary to verify:

1. Household size, when clarification is necessary;
2. Countable household income;
3. Child support actually received, when applicable; and
4. Other material information necessary to calculate the household's FPL percentage.

7. Employment Income Documentation

Reasonable documentation of employment income may include:

- Recent pay documentation;

- Employer income statements;
- W-2 forms;
- Year-to-date earnings information;
- Employment contracts or salary statements when appropriate; or
- Other reasonably reliable evidence of employment income.

13GEM Sporting does not require a fixed number of pay stubs in every case.

The amount of documentation requested should be sufficient to establish representative income without unnecessarily collecting repetitive records.

8. Variable Income

When employment income varies, 13GEM Sporting may request enough information to establish a representative income period.

Examples may include:

- Multiple recent pay periods;
- Year-to-date earnings;
- Employer verification;
- Commission records;
- Overtime history when materially relevant; or
- Another reasonable source.

The purpose is to establish representative income, not to collect every available earnings record.

9. Self-Employment Documentation

Reasonable documentation for self-employment income may include:

- Tax documentation;
- Profit-and-loss statements;
- Business income summaries;
- Bookkeeping reports;
- Payment records;
- Invoices;
- Reasonable income-and-expense statements; or
- Other records appropriate to the nature of the business.

Gross business revenue should not automatically be treated as household income.

Net self-employment income is determined after reasonable and necessary business expenses according to SOP-004.

10. Self-Employment and Proportionality

Self-employment does not automatically justify requiring complete access to all business or personal financial records.

13GEM Sporting should request only enough information to reasonably determine representative net self-employment income.

If a summary or narrower record sufficiently establishes the necessary information, broader records should not ordinarily be required.

11. Child Support Documentation

When child support is received, reasonable documentation may include:

- Child-support agency payment records;
- Payment histories;
- Relevant portions of a support order;
- Electronic payment records;
- Other reasonably reliable payment records; or
- Another reasonable source showing child support actually received.

The purpose is to establish the amount **actually received**, not to investigate the noncustodial parent's entire financial circumstances.

12. Child Support Orders

A complete divorce decree, custody case file, or court record should not automatically be required merely to verify child support.

When a support order is needed, applicants should generally be permitted to provide only the relevant portion necessary to establish the applicable information.

Unrelated sensitive information may generally be redacted.

13. Household-Size Documentation

Household-size documentation should not automatically be required when household composition is reasonably clear from the application.

When clarification is materially necessary, reasonable documentation may include:

- A brief applicant explanation;

- Relevant household records;
- Relevant portions of custody or guardianship documentation;
- School or residence information when appropriate; or
- Another reasonable source.

14. Custody Documentation

Formal custody documentation should not automatically be required for divorced or separated parents.

When custody materially affects household size and the arrangement is unclear, 13GEM Sporting may request the least intrusive reasonable documentation necessary to determine:

- Primary residence;
- Substantially equal physical custody;
- Whether the child is genuinely part of the applying household; or
- Whether inconsistent duplicate household claims exist.

15. Guardianship Documentation

When legal guardianship materially affects household eligibility and is not otherwise reasonably established, 13GEM Sporting may request reasonable evidence of guardianship.

Only the information necessary to establish the relevant legal responsibility should ordinarily be requested.

16. Tax Documentation

Tax returns or other tax documents may be useful when appropriate, particularly for:

- Self-employment;
- Irregular income;
- Multiple income sources; or
- Annual income verification.

Tax returns are **not automatically required for every applicant**.

A prior-year tax return should also not automatically control when reliable current information demonstrates that the household's circumstances have materially changed.

17. Bank Statements

Complete bank statements are:

Not ordinarily required.

Limited bank information may be requested only when reasonably necessary to resolve a material eligibility question, such as:

- Self-employment income that cannot reasonably be verified another way;
- Irregular income;
- Lack of conventional income documentation;
- Child-support verification;
- A material discrepancy; or
- Another legitimate unanswered income question.

18. Redaction of Bank Information

When limited bank documentation is reasonably necessary, applicants should generally be permitted to redact unrelated information.

Examples of information that may ordinarily be unnecessary include:

- Unrelated purchases;
- Personal spending details;
- Full account numbers;
- Unrelated transfers;
- Merchant information; and
- Other transactions unrelated to the eligibility question.

The information necessary to verify the relevant income or payment must remain visible.

19. Credit Reports and Credit Scores

Credit reports and credit scores are:

Not ordinarily required for scholarship eligibility.

The Scholarship Opportunity Program is not a credit-underwriting program.

A family's credit score does not determine its FPL percentage or Scholarship Sliding Scale bracket.

20. Assets

13GEM Sporting does not ordinarily conduct a comprehensive asset test.

Applicants should not automatically be required to provide complete information concerning:

- Home value;
- Vehicle value;
- Retirement-account balances;
- Savings balances;

- Investment-account balances; or
- Other personal property.

An asset is not automatically household income merely because the family owns it.

Income generated by an asset may be considered when countable under SOP-004.

21. Household Expenses

Applicants should not ordinarily be required to document every household expense.

Scholarship eligibility is not based upon subtracting ordinary personal expenses such as:

- Mortgage or rent;
- Utilities;
- Car payments;
- Credit-card debt;
- Private-school tuition;
- Food;
- Insurance;
- Consumer debt; or
- Other ordinary household spending

from countable household income.

22. Hardship Scholarship Documentation

For a Hardship Scholarship, documentation should focus on two questions:

1. **Did a genuine qualifying hardship occur?**
2. **Did the hardship significantly affect the family's financial circumstances?**

The family should provide enough information to reasonably establish both facts without being required to disclose unrelated private information.

23. Employment-Related Hardship

Reasonable documentation may include:

- Layoff or termination notice;
- Employer statement;
- Documentation of reduced work hours;
- Reduced-pay documentation;

- Unpaid-leave documentation;
- Unemployment documentation;
- Recent earnings information; or
- Another reasonable source demonstrating the employment change and financial impact.

24. Loss or Reduction of Child Support

When hardship is based upon an unexpected termination or substantial reduction of child support previously received, reasonable documentation may include:

- Recent payment history;
- Child-support agency records;
- Relevant correspondence;
- Relevant portions of a support record;
- Electronic payment history; or
- Another reasonable source demonstrating the change.

13GEM Sporting should focus on what is **actually currently being received**.

25. Medical Hardship Documentation

For medical hardship, 13GEM Sporting does **not** want or routinely request:

- Diagnoses;
- Complete medical histories;
- Treatment notes;
- Complete medical records;
- Detailed clinical information; or
- Unrelated health information.

The Scholarship Opportunity Program is concerned with the **financial effect of the medical event**, not the family's private clinical details.

26. What Medical Documentation Should Establish

When medical hardship is claimed, documentation should generally establish only what is reasonably necessary to determine that:

1. A significant medical event occurred;
2. The event was unexpected or extraordinary when relevant; and
3. The event resulted in significant loss of income or substantial unreimbursed financial burden.

27. Less-Intrusive Medical Documentation

Reasonable documentation may include:

- Medical bills;
- Explanation of Benefits (EOB) documents;
- Unpaid-leave documentation;
- Employer documentation showing reduced income;
- Disability-payment documentation;
- A basic provider statement confirming inability to work when necessary; or
- Another minimally intrusive source.

When one of these options sufficiently establishes the relevant facts, detailed medical records should not be requested.

28. Medical Information Redaction

Applicants should generally be permitted to redact medical information that is unrelated to the scholarship determination.

13GEM Sporting should avoid retaining sensitive clinical information that is unnecessary to reproduce or explain the scholarship decision.

29. Death, Separation, or Divorce Hardship

When hardship involves death, divorce, or separation, 13GEM Sporting should request only the documentation reasonably necessary to establish:

- That the event occurred, when necessary; and
- That it materially reduced household financial resources.

Complete probate, divorce, custody, or court files should not ordinarily be required.

30. Housing Loss, Displacement, Fire, or Disaster

Reasonable hardship documentation may include:

- Eviction or displacement documentation;
- Insurance records;
- Emergency-assistance records;
- Fire or disaster documentation;
- Relevant housing correspondence;
- Repair or replacement documentation when materially relevant; or

- Another reasonable source.

Only information necessary to establish the hardship and its financial effect should be requested.

31. Other Extraordinary Hardship

When a claimed hardship does not fit a listed category, 13GEM Sporting may accept other reasonable documentation appropriate to the circumstances.

The documentation requirement should remain focused on:

- The event;
- Its unforeseen or extraordinary nature; and
- Its significant financial impact.

32. Current Income After Hardship

A prior tax return or historical annual income amount should not automatically control a Hardship Scholarship determination when it no longer reasonably represents the family's current circumstances.

The Scholarship Committee may select the income measurement period that best represents the family's new/current financial condition.

Documentation should support that representative income determination.

33. No Fixed Hardship Measurement Period

Hardship applicants are not automatically required to provide exactly:

- 30 days;
- 60 days; or
- 90 days

of income documentation.

The appropriate measurement period depends upon the circumstances and should be sufficient to reasonably establish representative current income.

34. Alternative Documentation

If an applicant cannot provide a particular requested document, that fact does **not automatically disqualify the applicant**.

The applicant should be given a reasonable opportunity to provide another reliable source that verifies the necessary information.

The goal is to establish the material fact, not to require one particular piece of paper.

35. Applicant Explanations

A written applicant explanation may be appropriate when conventional documentation does not fully explain:

- Variable income;
- Recent employment changes;
- Child-support changes;
- Unusual self-employment circumstances;
- Household composition; or
- A hardship event.

An applicant explanation may supplement other verification when necessary.

36. Additional Documentation Requests

Additional documentation should be requested only when:

A legitimate unanswered question materially affects scholarship eligibility.

The request should identify the issue requiring clarification whenever practical.

Additional requests should not become an open-ended search through the family's finances.

37. Material Versus Immaterial Missing Information

An application should not be delayed or denied merely because an immaterial document or detail is absent.

The relevant question is whether the missing information prevents 13GEM Sporting from making a reliable scholarship determination.

If not, additional documentation may be unnecessary.

38. Sensitive Personal Information

13GEM Sporting should avoid collecting highly sensitive identifying information unless genuinely necessary.

Scholarship files should not routinely require:

- Full Social Security numbers;
- Full bank-account numbers;
- Payment-card credentials;
- Passwords;
- Unnecessary identification numbers; or
- Other highly sensitive information unrelated to scholarship eligibility.

39. Confidentiality

All scholarship documentation is confidential.

Access should be limited to individuals with a legitimate scholarship-administration need to know.

Detailed financial, custody, hardship, and medical information should not be shared with:

- Coaches;
- Volunteers;
- Donors or sponsors;
- Other families;
- Unrelated staff; or
- Other individuals without a legitimate administrative need.

40. Documentation and Scholarship Committee Review

The Scholarship Committee should receive only the information reasonably necessary to make or review the determination.

When an administrative summary sufficiently communicates a verified fact, unnecessary duplication of sensitive source documents should be avoided.

41. Documentation Retention

13GEM Sporting should maintain sufficient documentation or verified administrative summaries to explain and reproduce scholarship determinations.

Sensitive supporting documents should not be retained longer or more broadly than reasonably necessary.

Specific recordkeeping and retention procedures are governed by:

SOP-020 — Scholarship Program Administration & Recordkeeping Procedures.

42. Registration Fee Documentation

Scholarship documentation requirements are used to establish eligibility and do not alter the family's registration-fee responsibility.

The current 13GEM Sporting registration fee is:

6.25% of the family's scholarship-adjusted tuition amount owed at checkout.

The fee is calculated after the scholarship has reduced eligible tuition and is rounded to the nearest cent using standard currency rounding.

Families remain responsible for **100% of the applicable registration fee**.

No additional financial documentation should be required merely because a registration fee applies.

43. Scholarship and Registration Discounts

Documentation establishing scholarship eligibility does not establish eligibility for, or alter the rules governing, registration discounts.

For the same registration:

A family may use an approved Scholarship OR applicable registration discount(s), but not both.

Scholarships may not be stacked or combined with Multi-Child, Multi-Sport, Early Registration, or other applicable registration discounts.

No additional scholarship documentation should be requested merely because a family elects between its approved Scholarship and an applicable registration discount.

44. Documentation Does Not Determine Scholarship Percentage

Documentation establishes the facts necessary to calculate eligibility.

It does **not** give the Scholarship Committee discretion to select a scholarship percentage.

Once household size, countable household income, applicable FPL guideline, and rounded FPL percentage are established, the Scholarship Sliding Scale determines the award.

45. Equal and Consistent Documentation Standards

Documentation requirements should be administered consistently.

Applicants in materially similar circumstances should generally be asked for materially similar levels of verification.

Documentation requirements may not be increased or reduced because of:

- Personal relationships;
- Athletic ability;
- Coaching relationships;
- Donor preference;
- Family reputation;
- Sympathy;
- Favoritism; or
- Retaliation.

46. Good-Faith Errors and Fraud

A good-faith documentation error or misunderstanding should be distinguished from:

- Fraud;
- Falsified documentation;
- Intentional misrepresentation; or
- Intentional failure to disclose material information.

Reasonable clarification should generally be sought when an apparent inconsistency may result from a good-faith mistake.

47. Applicant Responsibility

Applicants are responsible for:

- Providing accurate information to the best of their knowledge;
- Providing reasonable documentation when materially necessary;
- Responding to legitimate clarification requests; and
- Informing 13GEM Sporting when information provided was materially incorrect at the time of submission.

Applicants are not responsible for providing unrelated information that 13GEM Sporting does not reasonably need to determine eligibility.

48. Governing Documentation Principles

The following principles govern all Scholarship Opportunity Program documentation:

Documentation Should Be Proportional.

Collect only what is reasonably necessary to establish a material eligibility fact.

Use the least intrusive reasonable documentation sufficient to answer the question.

Do not require every possible document merely because it exists.

Complete bank statements are not ordinarily required.

Credit reports and credit scores are not ordinarily required.

A comprehensive asset test is not ordinarily required.

Detailed medical records are not ordinarily required.

Allow reasonable alternative documentation when a preferred document is unavailable.

Request additional documentation only when a legitimate unanswered question materially affects eligibility.

Protect sensitive information and restrict access to those with a legitimate administrative need.

Documentation establishes the facts; established policy and the Scholarship Sliding Scale determine the award.

49. Approval

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Signature: JE

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