

13GEM SPORTING

Scholarship Confidentiality & Information Protection Policy

Policy Number: SOP-013

Version: 1.1

Related Program: 13GEM Sporting Scholarship Opportunity Program

Document Type: Internal Administrative Policy

Effective Date: 9/11/2026

1. Purpose

13GEM Sporting recognizes that Scholarship Opportunity Program applications may contain sensitive information concerning a family's income, household composition, employment, child support, financial circumstances, hardship events, and other private matters.

This policy establishes standards for collecting, accessing, using, discussing, storing, sharing, retaining, and disposing of scholarship information.

The purpose is to ensure that:

- Applicant privacy is respected;
- Only reasonably necessary information is collected;
- Access is limited to legitimate scholarship-administration purposes;
- Sensitive information is not unnecessarily copied or distributed;
- Scholarship decisions remain separate from coaching and unrelated program decisions; and
- Scholarship records are reasonably protected throughout their administrative lifecycle.

2. Governing Privacy Principle

13GEM Sporting will follow the principle:

Collect only what is reasonably necessary, provide access only to those who reasonably need it, use it only for legitimate scholarship administration, and retain it only as required by established administrative procedures.

The existence of a Scholarship Application does not create permission to broadly access or use a family's personal information.

PART I — SCOPE

3. Information Covered

This policy applies to information obtained or created in connection with:

- Standard Scholarship Applications;

- Hardship Scholarship Applications;
- Scholarship renewals;
- Supporting documentation;
- Household determinations;
- Income calculations;
- Child-support information;
- Hardship information;
- FPL calculations;
- Committee worksheets;
- Committee discussions;
- Scholarship determinations;
- Award and denial letters;
- Reconsideration requests;
- Payment-plan information related to scholarship administration; and
- Other records created specifically for Scholarship Opportunity Program administration.

4. People Covered

This policy applies to any person who receives access to scholarship information through 13GEM Sporting, including:

- Scholarship Committee members;
- Scholarship administrators;
- Authorized leadership;
- Employees;
- Contractors;
- Volunteers;
- Advisors; and
- Other persons specifically authorized to assist with Scholarship Opportunity Program administration.

PART II — MINIMUM NECESSARY COLLECTION

5. Minimum Necessary Standard

13GEM Sporting should collect only information reasonably necessary to:

- Determine household size;
- Determine countable household income;
- Verify a qualifying hardship when applicable;
- Calculate FPL;
- Determine scholarship eligibility;
- Administer an approved scholarship;
- Resolve a legitimate reconsideration request; or
- Meet another legitimate Scholarship Opportunity Program administrative need.

6. Documentation Should Be Proportional

The Scholarship Opportunity Program follows the principle:

Documentation Should Be Proportional.

Documentation requests should be proportional to the specific eligibility question requiring verification.

The Program should not request broad categories of sensitive information merely because such information might exist.

7. Additional Documentation

Before requesting additional sensitive information, the reviewer should determine:

1. What material eligibility question remains unanswered;
2. Whether existing information reasonably answers the question;
3. What minimum additional information would resolve the issue; and
4. Whether a less intrusive alternative is reasonably available.

8. Alternative Documentation

When more than one reasonable document can verify the same eligibility fact, applicants should generally be permitted to use the less intrusive reasonable alternative.

The Program should not require a particular document merely for administrative convenience when another reliable document sufficiently verifies the necessary fact.

PART III — PARTICULARLY SENSITIVE INFORMATION

9. Social Security Numbers

13GEM Sporting does not ordinarily need an applicant's Social Security number to determine Scholarship Opportunity Program eligibility.

Applicants should not be routinely asked to provide full Social Security numbers.

If a document contains a Social Security number that is unnecessary for scholarship review, the applicant should generally be permitted and encouraged to redact it.

10. Bank Account Information

13GEM Sporting does not ordinarily need:

- Complete bank-account numbers;
- Debit-card numbers;
- Credit-card numbers;
- Online-banking credentials; or
- Other payment credentials

for scholarship eligibility review.

Applicants should be permitted to redact unnecessary account information from documents submitted for scholarship purposes.

11. Bank Statements

Complete bank statements are:

Not ordinarily required.

Limited bank information may be requested only when reasonably necessary to answer a material eligibility question that cannot reasonably be resolved through less intrusive documentation.

When bank information is necessary, unrelated transactions and unnecessary identifying information should generally be permitted to be redacted.

12. Credit Information

Scholarship eligibility does not ordinarily require:

- Credit reports;
- Credit scores;
- Credit-card statements; or
- Consumer debt histories.

Such information should not be requested merely to evaluate whether a family appears financially responsible.

13. Assets

Ownership of assets does not automatically constitute countable household income.

Broad asset inventories should not ordinarily be requested as part of scholarship review unless a specific policy or legitimate material eligibility issue makes particular information necessary.

14. Tax Documentation

Tax returns may be useful in some cases but are not automatically required for every applicant.

When a tax document contains information unnecessary for the scholarship determination, reasonable redaction should be permitted when doing so does not prevent verification of the material eligibility facts.

PART IV — MEDICAL AND HARDSHIP PRIVACY

15. Medical Information

A Hardship Scholarship based upon illness, injury, or disability does not ordinarily require 13GEM Sporting to know the applicant's detailed diagnosis or medical history.

16. Medical Information That Should Not Ordinarily Be Requested

13GEM Sporting should not routinely request:

- Complete medical records;
- Detailed diagnoses;
- Treatment notes;
- Medical histories;
- Laboratory results;
- Imaging results;
- Prescription histories; or
- Other detailed clinical information.

17. What Medical-Hardship Review Actually Requires

The Scholarship Committee generally needs only enough information to reasonably establish:

1. That a qualifying event occurred;
2. That the event caused significant income loss or substantial unreimbursed financial burden; and
3. That the resulting financial impact materially affects scholarship eligibility.

18. Less Intrusive Medical-Hardship Documentation

Depending upon the circumstances, reasonable documentation may include:

- Medical bills;

- Explanations of benefits;
- Employer documentation of unpaid leave;
- Documentation of reduced income;
- Disability-payment documentation; or
- A basic provider statement when genuinely necessary.

19. Accidental Submission of Excessive Medical Information

If an applicant voluntarily submits medical information substantially beyond what is necessary for scholarship review, reviewers should avoid copying unnecessary details into Committee worksheets, minutes, correspondence, or other administrative records.

Access to the unnecessarily detailed information should be limited.

PART V — ACCESS CONTROL

20. Need-to-Know Access

Scholarship information should be accessible only to persons who reasonably require access to perform legitimate Scholarship Opportunity Program duties.

21. Committee Access

Scholarship Committee members should receive only the information reasonably necessary to evaluate the matter before them.

Committee membership does not create unrestricted access to every Scholarship Application or historical scholarship record.

22. Administrative Access

Authorized scholarship administrators may access records reasonably necessary to:

- Receive applications;
- Verify completeness;
- Calculate eligibility;
- Prepare Committee materials;
- Maintain records;
- Communicate determinations;
- Administer approved scholarships; and
- Perform other legitimate scholarship-administration duties.

23. Leadership Access

Organizational leadership should not access detailed scholarship information merely because of organizational position.

Access should be connected to a legitimate administrative, oversight, compliance, or decision-making responsibility.

24. Coaches

Coaches should not ordinarily receive:

- Household income;
- FPL percentages;
- Hardship details;
- Supporting financial documentation;
- Child-support information; or
- Other detailed scholarship information

unless the coach separately holds an authorized scholarship-administration role requiring that information.

25. Program Staff

Program staff who need to know that a scholarship has been approved should generally receive only the minimum information necessary to administer registration.

For example, staff may need to know:

- That a scholarship is approved;
- The applicable scholarship percentage;
- The registration or eligibility period; and
- The amount the family is responsible for paying.

They ordinarily do not need to know **why** the family qualified.

PART VI — SEPARATION FROM COACHING AND ATHLETIC DECISIONS

26. Scholarship Information and Athletic Decisions

Scholarship information should not be used to influence:

- Team selection;
- Playing time;
- Coaching decisions;

- Player evaluation;
- Roster placement;
- Competitive-team tryouts;
- Athletic advancement; or
- Other unrelated program decisions.

27. No Preferential Treatment

A family's receipt of a scholarship should neither advantage nor disadvantage a child in athletic or program decisions unrelated to financial eligibility.

28. Coach Knowledge

If a coach happens to know that a family receives a scholarship, that knowledge should not be discussed with other families, athletes, or unauthorized staff.

PART VII — DONORS, SPONSORS, AND OUTSIDE PARTIES

29. Donor Access

Donors, sponsors, contributors, or community supporters should not receive access to individual Scholarship Applications or confidential applicant information merely because they financially support scholarship opportunities.

30. Donor Influence

A donor or sponsor may not:

- Select an individual scholarship recipient;
- Direct approval or denial of a particular family;
- Determine a family's scholarship percentage;
- Receive detailed information concerning a family's hardship; or
- Condition support upon access to confidential scholarship records.

31. Aggregate Information

13GEM Sporting may provide appropriately aggregated or non-identifying program information for legitimate reporting or transparency purposes.

Examples may include:

- Number of scholarships awarded;
- General scholarship utilization;

- Aggregate tuition assistance provided; or
- Other statistics that do not reasonably identify individual families.

32. Applicant Stories or Testimonials

A family's scholarship story, hardship circumstances, name, photograph, testimonial, or other identifying information should not be used for fundraising, marketing, publicity, or promotional purposes merely because the family received a scholarship.

Separate appropriate permission should be obtained before using identifiable applicant information for such purposes.

PART VIII — INTERNAL COMMUNICATION

33. Appropriate Communication

Scholarship information may be communicated internally when reasonably necessary to:

- Review eligibility;
- Resolve a material question;
- Process registration;
- Calculate family payment responsibility;
- Administer an approved scholarship;
- Review reconsideration;
- Perform authorized oversight; or
- Meet another legitimate scholarship-administration purpose.

34. Inappropriate Communication

Scholarship information must not be shared for:

- Gossip;
- Curiosity;
- Personal interest;
- Coaching advantage;
- Recruiting;
- Marketing;
- Social-media discussion;
- Unrelated business decisions; or

- Other purposes unrelated to legitimate Scholarship Opportunity Program administration.

35. Email and Electronic Communication

When scholarship information is transmitted electronically, staff and Committee members should:

- Limit recipients to persons who need the information;
- Avoid unnecessary forwarding;
- Avoid including sensitive information in subject lines when practical;
- Avoid attaching unnecessary documents;
- Confirm recipients before sending sensitive information; and
- Use reasonably secure organizational systems when available.

36. Text Messaging

Detailed scholarship financial, hardship, medical, or household information should generally not be transmitted through informal group text messages.

If text messaging is necessary for routine administrative communication, the amount of sensitive information included should be minimized.

PART IX — PHYSICAL AND ELECTRONIC RECORDS

37. Electronic Records

Electronic scholarship records should be maintained in a reasonably protected location with access limited to authorized users.

Reasonable safeguards may include:

- Password-protected accounts;
- Access permissions;
- Restricted folders;
- Device security;
- Multi-factor authentication when available; and
- Other reasonable security measures appropriate to the systems used by 13GEM Sporting.

38. Physical Records

Physical scholarship records, when maintained, should be stored in a location reasonably protected from unauthorized access.

Documents should not be left unattended in public or commonly accessible areas.

39. Personal Devices

When scholarship information is temporarily accessed on a personal device for legitimate administrative purposes, reasonable care should be taken to prevent unauthorized access, unnecessary local copies, or long-term storage outside approved record systems.

40. Printing

Sensitive scholarship records should be printed only when reasonably necessary.

Printed copies that are no longer required should be securely disposed of rather than placed intact in ordinary trash or recycling.

PART X — WORKSHEETS, NOTES, AND COMMITTEE RECORDS

41. Scholarship Committee Review Worksheet

SOP-012 should contain sufficient information to reproduce and explain the determination without unnecessarily duplicating sensitive information contained in the applicant's supporting documentation.

42. Committee Notes

Committee members should avoid recording unnecessary:

- Medical details;
- Personal family history;
- Unrelated financial information;
- Subjective judgments;
- Rumors;
- Lifestyle observations; or
- Other information not materially relevant to scholarship eligibility.

43. Committee Minutes

Committee minutes should generally document:

- Participants;
- Conflicts and recusals;
- Material eligibility questions;
- Necessary factual determinations;
- Applicable policy;
- Determination; and

- Other information reasonably necessary for accountability.

Minutes should not become a detailed narrative of the family's private circumstances.

PART XI — DETERMINATION COMMUNICATION

44. Award Letters

Scholarship Award Letters should communicate information reasonably necessary for the family to understand and use its award.

An Award Letter may include:

- Scholarship type;
- Scholarship percentage;
- Applicable eligibility period or registration cycle;
- Family tuition responsibility;
- Applicable registration fee;
- Scholarship-versus-discount rule;
- Renewal requirements; and
- Other necessary administrative information.

It generally does not need to repeat detailed financial or hardship information.

45. Denial Letters

Denial or ineligibility letters should provide a sufficient explanation for the applicant to understand the material basis for the determination without unnecessarily reproducing sensitive information.

46. Reconsideration Communications

Information submitted during reconsideration remains subject to this Confidentiality & Information Protection Policy.

PART XII — RETENTION AND DISPOSAL

47. Retention Principle

Scholarship records should be retained according to the official recordkeeping periods established in:

SOP-020 — Scholarship Program Administration & Recordkeeping Procedures.

This policy does not independently establish a separate retention period.

48. Data Minimization During Retention

The fact that a record must be retained does not necessarily require retention of every unnecessary duplicate, informal note, or sensitive document originally created or received.

13GEM Sporting should distinguish between:

- Core determination records;
- Necessary supporting documentation; and
- Temporary or unnecessary duplicate information.

49. Secure Disposal

When scholarship records are authorized for disposal, they should be disposed of in a manner reasonably designed to prevent reconstruction or unauthorized disclosure.

Examples include:

- Secure deletion of electronic files;
- Shredding of physical documents; or
- Use of another reasonably secure destruction method.

PART XIII — CONFIDENTIALITY INCIDENTS

50. Accidental Disclosure

If scholarship information is accidentally sent, shown, or disclosed to an unauthorized person, the incident should be reported promptly to appropriate 13GEM Sporting leadership or the Scholarship Program administrator.

51. Response

Depending upon the circumstances, reasonable response steps may include:

- Limiting further disclosure;
- Requesting deletion or return of improperly disclosed information;
- Changing access permissions;
- Documenting the incident;
- Determining whether affected individuals should be notified;
- Reviewing whether procedures should be improved; and
- Taking other reasonable corrective measures.

The response should be proportionate to the nature and sensitivity of the information involved.

PART XIV — CONFIDENTIALITY ACKNOWLEDGMENT

52. Personnel Responsibility

Individuals granted access to scholarship information are responsible for understanding and complying with this policy.

Scholarship Committee members and other regular scholarship administrators should acknowledge their confidentiality responsibilities when appointed or assigned and periodically thereafter.

Name:

Role:

I acknowledge that I may receive access to confidential Scholarship Opportunity Program information solely for legitimate 13GEM Sporting administrative purposes. I agree to protect that information and not use or disclose it for unauthorized purposes.

Signature:

Date:

PART XV — POLICY ADMINISTRATION

53. Relationship to Other Scholarship Policies

This policy should be interpreted consistently with:

- SOP-001 — Scholarship Opportunity Program Policy;
- SOP-002 — Household Size & Child Support Income Policy;
- SOP-004 — Scholarship Income Definition & Calculation Policy;
- SOP-006 — Scholarship Documentation Requirements;
- SOP-007 — Hardship Scholarship Policy;
- SOP-011 — Scholarship Committee Charter;
- SOP-012 — Scholarship Committee Review Worksheet; and
- SOP-020 — Scholarship Program Administration & Recordkeeping Procedures.

54. Policy Questions

Questions concerning access, confidentiality, or appropriate use of scholarship information should be resolved before unnecessary disclosure occurs whenever practical.

When uncertain whether a person needs detailed scholarship information, the preferred approach is to provide only the minimum information reasonably necessary for that person's legitimate function.

55. Version Control

Approved versions of this policy should not be silently overwritten.

When substantive revisions are adopted:

- A new version number should be assigned;
- The prior version should be retained as a superseded historical version;
- The current operational version should be clearly identified; and
- Historical records should permit 13GEM Sporting to determine which policy version governed a prior determination.

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