

Guidelines for the Awarding of OSU Scholarships

Oregon State University's current campus scholarship management processes are intentionally decentralized to allow the colleges and academic departments the flexibility to design and implement scholarship awarding policies and practices that are appropriate for their specific disciplines and student populations.

The OSU Scholarship Office provides the following guidance and recommendations to help the colleges and academic departments design and implement campus scholarship awarding processes that are informed by federal and state laws, university policy, and scholarship administration best practices.

Scholarship Data Sharing and Data Security

Laws and Regulations Governing Student-Level Data Sharing

There are three important laws that control the release of various types of student data: (1) the Privacy Act (5 U.S.C. § 552); (2) the Family Educational Rights and Privacy Act (FERPA); and (3) Sections 483(a)(3)(E) and 485B(d)(2) of the Higher Education Act (HEA), as amended. OSU faculty and staff who are involved in scholarship processes that give them access to student data are responsible for being familiar with each law and the associated compliance requirements at OSU.

The Privacy Act governs the collection, maintenance, and use of records maintained by federal agencies and generally prohibits agencies from disclosing data contained in those records. The act applies to the U.S. Department of Education's student records by preventing the improper release of government-held student personally identifiable information (PII). The department is prohibited from releasing student records from their systems without prior written consent from the individual to whom the record pertains unless the data is being shared with institutions for the "routine use" for which the data was collected. Under the Privacy Act, releasing PII to scholarship managers at postsecondary institutions for the purposes of administering campus-based scholarship application, selection, and awarding processes is considered a permissible routine use.

FERPA regulations prohibit institutions that receive federal funds from disclosing PII contained in education records without the express written consent of the student except under certain limited circumstances. Under FERPA, releasing limited information from a student's educational records to OSU faculty and staff for the purposes of administering campus-based scholarship application, selection, and awarding processes is considered an approved exception that does not require prior written consent from the student. At OSU, the Office of the Registrar (OtR) is responsible for interpreting

FERPA as it relates to the release of student-level data, so in situations where the operational requirements associated with FERPA are unclear, the OtR must be consulted since it is authorized to make the final decision.

For scholarships with a financial need component, section 483(a)(3)(E) of the Higher Education Act (HEA) also applies. HEA states that FAFSA application data may only be used for the application, award, and administration of Title IV funds, state aid, and institutional aid programs. At OSU, the Office of Financial Aid (OFA) is responsible for interpreting HEA as it relates to the release of student-level financial aid data, and the OFA has determined that the only student-level financial aid data that can be shared with scholarship review committees are total cost of attendance, total gift aid (which includes federal, state, and institutional grants, as well as campus-based scholarship awards), and financial need level. "Financial need level" is a value the OFA assigns each student based on a formula that considers total budget, expected family contribution (EFC), and gift aid received. The available options include high, medium, low, no need, no budget, and unknown, and these values are intended to be used to compare the relative levels of financial need between students.

OSU ScholarDollars

In November 2017, OSU signed a three-year contract with Blackbaud, Inc. for services associated with a cloud-based scholarship management system, OSU ScholarDollars (OSUSD). This system has replaced the Scholarship Management System (SMS), which OSU previously had used as a student application portal. SMS was decommissioned in March 2019, so it is no longer available to colleges and academic departments, though its data have been archived in compliance with Oregon State University's General Records Retention Schedule.

In early 2018, the Scholarship Office and OSU programmers developed an automated process that exports student data from Banner to OSUSD. The daily student data export currently includes more than 125 data points for each admitted and current OSU student with an active record in Banner. The export process and the student data it transmits were reviewed and approved by the OtR and the OFA as being compliant with the requirements of the Privacy Act, FERPA, and HEA. At this time, the only admitted and current students whose data are not included in the daily export to OSUSD are those who have been designated as "Confidential" in university records since OSUSD does not yet have an option to conceal a "Confidential" student's name and other identifying information. Therefore, "Confidential" students currently cannot be considered for scholarships awarded through OSUSD because their information is not included in the daily student data export.

In order to obtain access to the student-level information available in OSUSD, OSU faculty and staff must have an educational need for those data based on the responsibilities associated with their position. User accounts are requested through the Scholarship Office, which evaluates each request and determines the appropriate level of

access within the system. Once a user account has been established, faculty and staff must use their ONID credentials and authenticate their identity through Duo to access the system.

Scholarship-Related CORE Reports

OSU has developed four scholarship-related CORE reports that include information regarding students' total gift aid, total cost of attendance, and financial need level. These reports are:

- ENM0309 New Admitted Student Demographics
- ENM0310 Student Demographics - Current Students
- ENM0315 Student Demographics - Current Students by ID
- ENM0317 New Admitted Student Demographics by ID

Campus scholarship administrators may request authorization to access these reports through the Scholarship Office, and each request will be evaluated to confirm whether access is appropriate. Before access is authorized, new users must complete a brief training with the Scholarship Office, which addresses permitted uses of the data and how to interpret the information included in the reports.

Appropriate Use

In order to ensure compliance with the requirements of the Privacy Act, FERPA, and HEA, as well as university policy, access to student-level data in OSUSD and the scholarship-related CORE reports is authorized by the Scholarship Office at the lowest level required for a faculty or staff member to fulfill their assigned responsibilities in the context of scholarship awarding processes.

If an OSU faculty or staff member is found to have accessed information in OSUSD and/or the scholarship-related CORE reports for any unauthorized use, their user account for one or both of those systems may be limited, suspended, or revoked by the OSU Scholarship Office in its sole discretion, and the situation will be referred to the appropriate university authorities for possible disciplinary action.

Examples of unauthorized use may include, but are not limited to, sharing student-level data either publicly or privately without prior written consent from the student, sharing student-level data with persons who are not current OSU faculty or staff, and/or sharing student-level data with persons who are current OSU faculty or staff but who are not authorized to have access to that information in OSUSD or the scholarship-related CORE reports.

Any questions regarding the appropriate use of OSUSD or scholarship-related CORE report student-level data should be directed to the Scholarship Office.

FERPA Compliance

In addition, the U.S. Department of Education (DOE) investigates allegations of FERPA violations submitted by parents or students through a written complaint process. If the DOE finds that OSU has not complied with a provision of FERPA, it will issue a statement describing the specific steps OSU must take to comply and a set time period during which the university may comply voluntarily. If OSU does not comply voluntarily within the set time period, the DOE may take any of the following enforcement actions:

1. Withhold further payments to OSU from any program administered by the DOE (e.g., federal financial aid programs);
2. Issue a complaint to compel OSU to comply through a cease and desist order; or
3. Terminate OSU's eligibility to receive funding under any program administered by the DOE (e.g., federal financial aid programs).

Any questions regarding compliance with the provisions of FERPA should be directed to the Office of the Registrar.

Scholarship Selection and Awarding Processes

Student Consent

To ensure that scholarship applicants are aware that information from their university records will be shared with the scholarship review committees during the application review process, students are asked to affirm their consent to the release of those data before submitting their OSUSD application.

The final question on the OSUSD general application reads as follows [**bold and italics added for emphasis**]:

"The Family Educational Rights and Privacy Act (FERPA) of 1974 is a federal law designed to protect the privacy of a student's education records. Education records include all student records. They are considered confidential and will not be released without written consent from the student. In accordance with FERPA, it is necessary for Oregon State University to obtain written consent from the student in order to release any information to a third party. By indicating my acceptance of these terms below, I authorize Oregon State University to provide Blackbaud with information from my student education records which may include, but is not limited to, my ONID student identification number, mailing address, campus email address, high school and high school graduation date, residency status, gender, ethnicity, academic program, GPA,

financial need level, current and past enrollment levels, and course history. ***I also hereby request and authorize the release of information contained in my student education records to the appropriate Oregon State University scholarship selection committees for the purpose of application review and scholarship award recipient selection.*** I understand that this authorization for Oregon State University and Blackbaud to use my student education records to assist in the awarding of scholarships will remain valid until I notify Oregon State University and Blackbaud in writing that I am revoking this authorization.”

Since the sharing of information from university records is a critical component of the application review process, students must indicate that they consent to this release before the system will permit them to submit the scholarship application. It is important to note that this consent only authorizes the release of student-level data to those serving on the scholarship review committee and for the purpose of application review and recipient selection. Any other use of this information is not authorized under FERPA.

Scholarship Review Committees

Scholarship recipients typically are selected, at least in part, based on qualitative assessments of various types of merit, rather than based on solely quantitative measures. In order to reduce the potential influence of personal bias on recipient selection, the Scholarship Office recommends that colleges and academic departments convene a scholarship review committee consisting of at least three unrelated current OSU faculty and/or staff members for each scholarship (e.g., persons who are third-degree relatives or closer by biology, domestic partnership, or adoption/guardianship). Persons who are not current OSU faculty and/or staff members should not be eligible to serve on scholarship review committees due to the confidential nature of the information being reviewed, and donors should not serve on the scholarship review committee for any scholarship to which they have contributed funding (see “Donor Participation” below). Per the Office of the Registrar, current OSU students are not permitted to have access to confidential information regarding other OSU students unless specific and limited access has received prior approval based on the responsibilities associated with the student’s employment with OSU. Therefore, current OSU students should not serve on scholarship review committees. The identities of those serving on scholarship review committees should not be shared with students to protect the confidentiality and integrity of the selection process and to insulate committee members from attempts to influence their evaluation of applicants or the selection of award recipients.

The Scholarship Office recommends that college-level committees be convened by the appropriate Dean, and department-level committees be convened by the appropriate Department Chair/Director. Deans may designate Associate or Assistant Deans to convene college-level committees at their discretion. The Deans (or their designees) and Department Chairs/Directors should be responsible for oversight of the scholarship

review committees' application review and recipient selection processes, and they also should have the authority to excuse committee members, add committee members, or disband an existing committee and create a new committee if the committee members fail to comply with university, college, and/or department scholarship administration policies.

The Scholarship Office recommends that the Dean (or their designee) or Department Chair/Director designate at least one member from each scholarship review committee to serve as a Committee Chair. Committee Chairs should be responsible for ensuring that applications are reviewed and awarding decisions are made in a timely manner in accordance with university, college, and/or department scholarship administration processes and policies. Recipient selections may be ratified by a simple majority or a plurality. Chairs should coordinate the submission of the scholarship review committees' awarding decisions for the scholarships through OSUSD. Scholarship review committee members who are not designated as Committee Chairs should not have the authority to submit scholarship award decisions.

Conflict of Interest

Scholarship review committees must avoid the appearance of conflicts of interest during the application review and recipient selection processes. A conflict of interest can occur when a committee member's influence or action results in a direct financial benefit to a person closely related to that committee member. Possible conflicts of interest may include, but are not limited to, the following:

- The scholarship review committee member is an applicant for the scholarship.
- The scholarship review committee member has a close relationship with one or more of the scholarship applicants (e.g., family member, friend, employer).

The Scholarship Office recommends that members of scholarship review committees be required to disclose any possible conflicts of interest that may arise before, during, or after the application review and recipient selection processes. Disclosures should be made promptly to the Dean or Department Chair/Director who convened the scholarship review committee. The Dean or Department Chair/Director should then determine whether a conflict of interest exists, and if it does, they should excuse the committee member from service on that particular scholarship review committee and decide whether additional steps must be taken to ensure that the conflict does not influence the application review or recipient selection processes for that scholarship.

If the conflict is disclosed after the review committee has selected award recipients, the Dean or Department Chair/Director should determine whether the conflict of interest influenced the committee's awarding decisions. If it did, the Dean or Department Chair/Director should dissolve the committee and convene another committee that consists entirely of new members to review applications again and select recipients through an independent process.

The Scholarship Office recommends that any faculty or staff member who fails to disclose a potential conflict of interest be disqualified from serving on all scholarship review committees at OSU.

To further reduce the risk associated with potential conflicts of interest, colleges and departments may wish to consider activating OSUSD's anonymizing feature for one or more specific scholarships. When this option is selected, OSUSD removes all personally identifiable information from each student's applicant record to mitigate against the influence of conflicts of interest on the review of applications and selection of scholarship recipients.

Donor Participation

IRS regulations prohibit a donor from selecting the recipients of a scholarship to which they have contributed. Donors are required to relinquish all rights to the gift in order for the IRS to consider it a tax-deductible charitable contribution, and allowing the donor to select the recipient of those funds is inconsistent with this requirement. If a donor were to report a scholarship contribution to the IRS as tax-deductible, then later the donor were found to have selected one or more recipients for that scholarship, the donor could be subject to legal and financial penalties for misrepresenting to the IRS the nature of the contribution. Therefore, the Scholarship Office recommends that donors not be permitted to serve on scholarship review committees or participate in the selection of scholarship recipients or decisions regarding award amounts in any capacity.

Compliance with Donor Restrictions

Scholarship review committees are expected to review all eligible applications in the applicant pool for each scholarship. The Scholarship Office recommends that the pools of eligible applicants be generated based solely on the criteria specified by the scholarship donor(s) or their authorized representative(s) in the most-recently executed gift agreement or amendment for a particular scholarship. Scholarship review committees may not establish or apply additional eligibility criteria without the donor's approval and the execution of appropriate supporting documentation, so all students who meet the stipulated eligibility requirements must be included in the initial applicant pool. Donor documentation may be reviewed using the OSU Foundation's (OSUF's) Financial Edge system to resolve questions regarding eligibility criteria, and access to Financial Edge may be requested directly from the OSU Foundation.

Additional or different eligibility criteria communicated by the donor(s) or their authorized representative(s) through another medium (e.g., verbally or by email), or by anyone other than the donor(s) or their authorized representative(s), are not valid and should not be considered by the scholarship review committee during the application or review processes. Likewise, the scholarship review committee is not authorized to disregard donor-stipulated eligibility criteria when creating applicant pools, reviewing

application materials, or selecting award recipients. Scholarship review committees may, however, create and implement their own internal processes for evaluating eligible applicants and identifying award recipients, as long as all selected scholarship recipients meet the donor-stipulated eligibility criteria.

All donor-stipulated eligibility requirements must comply with federal, state, and local laws, as well as current university policies and procedures. A scholarship review committee should notify both the appropriate Dean or Department Chair/Director and the Scholarship Office if it encounters an eligibility criterion related to a protected class as defined by that may violate federal, state, or local laws and/or current university policies and procedures. Examples include, but are not limited to, eligibility criteria related to age, disability, relationship status, sex/gender, sexual orientation, race/ethnicity, religion, and/or citizenship/nationality. Any scholarship with eligibility criteria related to one or more of these protected class categories should not be awarded until the criteria have been reviewed by the Scholarship Office and any necessary changes are made to bring the scholarship into compliance with federal, state, and local laws, as well as current university policies and procedures.

In addition to complying with donor-stipulated eligibility criteria, the Scholarship Office recommends that scholarship review committees also follow any awarding parameters described in the donor documentation. The most common awarding parameters specify individual award values, the number of awards offered, and the timing of award offers or disbursements. As with eligibility criteria, the scholarship review committee is not authorized to disregard donor-stipulated awarding parameters or to apply other awarding parameters that are not present in the donor documentation when reviewing application materials and selecting award recipients.

Financial Need

Some scholarship donors may request that applicants with demonstrated financial need be given either preferential or exclusive consideration by the appropriate scholarship review committee.

To facilitate the application of such donor stipulations during the application review process, the OSU Office of Financial Aid has determined that three types of student-level financial aid data can be shared with scholarship review committees. These data include total cost of attendance, total gift aid (which includes federal, state, and institutional grants, as well as campus-based scholarship awards), and financial need level.

“Total cost of attendance” is an overall budget assigned to each student based on their residency status, educational program, housing choice, and enrollment level. The cost of attendance reflects the average annual costs associated with tuition and fees, housing and dining, books and supplies, transportation, and personal expenses.

“Total gift aid” is a figure that represents the sum of all federal, state, and institutional grants a student is receiving, in addition to any campus-based scholarship awards already offered to the student. For example, the total gift aid for a resident student with a significant level of financial need and high academic merit could include a Pell Grant (federal), an Oregon Opportunity Grant (state), a Bridge to Success Program Grant (institutional), and a Finley Academic Excellence Scholarship (campus-based merit scholarship). A particular student’s total gift aid figure is adjusted dynamically throughout the academic year if additional grants or scholarships are awarded to that student.

“Financial need level” is a value the OFA calculates for each student based on a formula that considers total cost of attendance and expected family contribution (EFC). The available options currently include high, medium, low, no need, no budget, and unknown:

- High – A student who has access to personal resources that cover up to 32% of their total cost of attendance. This student is eligible for scholarships that require financial need.
- Medium – A student who has access to personal resources that cover between 33% and 66% of their total cost of attendance. This student is eligible for scholarships that require financial need.
- Low – A student who has access to personal resources that cover between 67% and 96% of their total cost of attendance. This student is eligible for scholarships that require financial need.
- No Need – A student who has access to personal resources that cover more than 96% of their total cost of attendance. This student is not eligible for scholarships that require financial need.
- No Budget – A student whose FAFSA or ORSAA has been submitted and is being evaluated by the OFA. The student’s financial need level will be updated when the OFA has completed its review. This student is not eligible for scholarships that require financial need unless the OFA updates their financial need level to low, medium, or high.
- Unknown – A student who has not filed a FAFSA or ORSAA with OSU. This student is not eligible for scholarships that require financial need unless they submit a FAFSA or ORSAA and OFA updates their financial need level to low, medium, or high.

Scholarship review committees may select any student whose financial need level is low, medium, or high for a scholarship that requires recipients to have demonstrated financial need.

Since total gift aid and financial need level values are derived from FAFSA and ORSAA data, this information may be used only for the purpose of awarding and administering financial aid and scholarships. Scholarship review committees are not authorized to share these data with anyone who is not performing one of those functions.

Fairness and Equity

The Scholarship Office recommends that the colleges and academic departments develop written procedures that provide detailed guidance regarding application review and recipient selection processes. Such procedures will increase transparency surrounding the awarding process and promote fairness and equity in application review and recipient selection.

OSUSD offers multiple options that support equitable consideration of applicants. In the system, colleges and academic departments have access to a feature that anonymizes applicant pools for specific scholarships by removing all personally identifiable information from each student's applicant record. Anonymizing applications in this manner reduces the potential impact of bias based on the reviewer's personal experience of the student separate from the scholarship application.

Colleges and academic departments also have the option of creating formal scoring rubrics in OSUSD. These rubrics are highly customizable, and a unique rubric can be created for every scholarship. The system will require scholarship review committee members to complete a scoring rubric, if one exists, before awards can be loaded for the selected recipients. These completed rubrics then become part of the documentation for that scholarship awarding period and create a record of the committee's awarding process that can be referenced if questions about fairness or equity were to arise. The Scholarship Office recommends that the colleges and academic departments create a scoring rubric in OSUSD for each scholarship they are responsible for managing.

Some donors have established scholarships to support varying diversity initiatives. The colleges and academic departments should be aware that the laws and regulations surrounding scholarships with diversity-related eligibility criteria are now more restrictive than they were in the past, and they are continuing to evolve fairly rapidly. Under Oregon state law (ORS 659.850), "[a] person may not be subjected to discrimination in any public elementary, secondary or community college education program or service, school or interschool activity or in any higher education program or service, school or interschool activity where the program, service, school or activity is financed in whole or in part by moneys appropriated by the Legislative Assembly." The same state law defines discrimination as "any act that unreasonably differentiates treatment, intended or unintended, or any act that is fair in form but discriminatory in operation, either of which is based on race, color, religion, sex, sexual orientation, national origin, marital status, age or disability." OSU's discrimination policy further prohibits the restriction of financial assistance based on race. Therefore, OSU currently may not administer any campus-based scholarship – whether university- or donor-funded – in a manner that limits eligibility or gives preferential consideration based on these specified characteristics. The Scholarship Office recommends that the colleges and academic departments audit their scholarships on a regular schedule to identify any that may need to be updated to adapt to changes in federal and state laws or university policy.

Application Cycles and Awarding Timelines

OSU's colleges, departments, and programs have the ability to determine the begin and end dates of application cycles for individual campus-based scholarships on a case-by-case basis through OSUSD. November 1st is the earliest date available to begin accepting applications through OSUSD, and June 30th is the latest date available to end an application cycle in the system. The begin and end dates for a particular scholarship's application cycle is displayed to students in OSUSD. The most commonly-used application deadline for campus scholarships is February 15th.

The Scholarship Office recommends that colleges, departments, and programs that offer scholarships to prospective students of any level select and notify the recipients of the awards as early as possible, but no later than one month prior to the deadline to accept the offer of admission. For example, a prospective freshman who is admitted to OSU on February 15th should be notified of all scholarship awards between February 15th and April 1st if the student is asked to accept or decline the offer of admission by May 1st. Awarding scholarships to prospective students as early as possible maximizes the potential recruitment impact of the awards.

The Scholarship Office also recommends that recipients of scholarships for current students be selected and notified as early as possible, preferably during the spring term prior to the academic year for which the scholarship award is being offered. Early selection and notification permits the Office of Financial Aid to make any necessary adjustments to a student's financial aid package earlier, which allows students more time to plan for the following academic year's educational costs. Ideally, current students will be notified of all scholarship offers no later than June 30th prior to the academic year for which the scholarships are being awarded.

Late awarding of scholarships – such as “year-end” or “graduation” awards – may have unintended consequences for the recipients. If a student is receiving other need-based financial aid (e.g. Pell Grant, Oregon Opportunity Grant, or a federal student loan), the Office of Financial Aid is required to monitor the total of all aid received to ensure it does not exceed the student's cost of attendance. If a student has already received the maximum amount of total aid for which they are eligible, then is awarded a new scholarship at the end of the year, the Office of Financial Aid may have to reduce some other aid to “make room” for the new scholarship in the student's aid package. In some cases, this adjustment may result in a “net zero” situation for the student, where the scholarship funds may need to be applied toward reducing a loan or other aid, rather than the funds being released to the student in addition to the other aid. Therefore, the Scholarship Office suggests that students who will receive late scholarship awards be advised to contact the Office of Financial Aid to discuss whether and how the late award will impact other aid the student received previously.

Scholarship Budgets

Beginning in early March of each year, the OSUF calculates initial awarding budgets for scholarship funds and loads those figures to the Foundation Reimbursement System (GRS). These awarding budgets also are loaded to OSUSD by the Scholarship Office. The formula that OSUF uses to calculate budgets considers the current balance of the fund, amounts that have been encumbered for undisbursed scholarship awards, pledged cash gifts, and estimates of quarterly endowment earnings based on the endowment fund's average performance over the prior twelve quarters. As the custodian of the scholarship funds, OSUF is authorized to set the awarding budgets, and the Scholarship Office recommends that the colleges and academic colleges not exceed the OSUF awarding budgets when offering scholarship awards.

Furthermore, although the current method of calculating annual budget allocations for scholarship funds at OSUF includes anticipated gifts and projected endowment income, the Scholarship Office recommends that the colleges and academic departments choose to adopt the best practice of limiting their scholarship awards to the funding that is already on deposit at the OSUF at the time the awards are offered. Once the university extends a written scholarship offer to a student, that offer becomes legally binding and must be fulfilled, regardless of whether the anticipated additional funding materializes. Therefore, offering scholarship awards to students based on estimated future fund balances is a high-risk behavior that could expose the university to significant liability if those additional funds are not available at the time of award disbursement.

For example, under current OSUF practice, the awarding budget for an endowed scholarship with a \$2,000 cash pledge would be \$7,000 based on the following calculations:

Current scholarship fund balance	\$5,000
Less undisbursed scholarship awards	\$1,000
Plus pledged cash gift	\$2,000
<u>Plus estimated endowment income</u>	<u>\$1,000</u>
Projected scholarship fund balance	\$7,000

If the college or academic department chooses to restrict its awarding to current funding, however, the awarding budget for the same endowed scholarship would be \$4,000 based on the following calculations:

Current scholarship fund balance	\$5,000
<u>Less undisbursed scholarship awards</u>	<u>\$1,000</u>
Available scholarship fund balance	\$4,000

The Scholarship Office recommends that this second calculation method be used, and that the scholarship review committee offer initial awards totaling no more than the available scholarship fund balance as determined by that calculation. The scholarship review committee should be encouraged to designate other students from the same

applicant pool as “alternates” who may be awarded the scholarship at a later time if/when additional funding becomes available. OSUSD offers the option of categorizing one or more students in each applicant pool as an “Alternate,” which would allow the committee to quickly and easily find additional students who had already been considered for the award and identified as suitable candidates.

On occasion, the scholarship fund balance may not be sufficient to support the number and/or value of individual scholarship awards stipulated by the donor’s gift agreement. In these cases, the Scholarship Office recommends that the college or academic department work collaboratively with the appropriate OSUF or college development staff member to determine the donor’s preference. Possible options may include the contribution of additional funds, a delay in awarding of the scholarship to a future academic term, or approval of a one-time exception to the terms of the gift agreement to permit an award that does not comply with the standard awarding parameters. The “exception” option is most commonly exercised when a scholarship fund will be closed following the distribution of the remaining monies in the account.

Scholarship Award Notification

OSU and OSUF require that proposed scholarship awards be approved by an authorized signer, the OSUF, and the OFA before a student is notified of the award. Once the necessary approvals have been obtained, the Scholarship Office recommends that the colleges and academic departments generate scholarship award notification letters through OSUSD. A customized award notification letter template can be created for each scholarship, and OSUSD will add the student’s name and award information to the template automatically before the notification is released. Award notification letters should include basic information about the scholarship award, such as the name, amount, and terms for which the scholarship is being awarded, as well as any terms and conditions the award recipient must meet to retain eligibility for the scholarship. These terms and conditions should be based solely on donor-stipulated eligibility criteria; colleges and academic departments should not apply additional eligibility restrictions that are not present in the donor documentation.

Oregon State University does not consider scholarship award information to be “directory information.” Therefore, in accordance with FERPA, information regarding scholarship recipients and their awards may not be shared without prior written consent from the student. Unauthorized releases of scholarship information include, but are not limited to, publishing scholarship recipient names on a website or in printed materials, sharing scholarship recipient names with donors, and releasing recipient or award information to university personnel who do not have an educational need-to-know. When students accept each of their scholarship awards in OSUSD, they are asked to provide consent to the release of information about each individual scholarship award to the OSUF so it can be shared with the scholarship donors. Students may choose to either authorize or decline release of their award information without impact on their eligibility for the scholarship award. If a college or academic department would like to share

details about the scholarship award publicly, the Scholarship Office recommends that they obtain prior written consent from the scholarship recipient for that specific information release.

The Scholarship Office also recommends that the colleges and academic departments refrain from sharing scholarship donor contact information with award recipients unless the donor specifically requests the information release in writing. This approach respects the donors' prerogative to determine what type of contact, and how much, they wish to have with their award recipients.

Scholarship Fund Utilization

Donors establish scholarships at OSU with the expectation that the colleges and academic departments will steward their scholarship funds responsibly and award the scholarships in accordance with their instructions. An important component of stewarding these scholarships is striving to award all available funds each year to eligible students.

The Scholarship Office recommends that the colleges and academic departments develop a scholarship awarding calendar that includes periodic reviews of scholarship fund utilization throughout each year. At a minimum, fund utilization should be reviewed at least twice per year. The first review should be conducted shortly before the awarding process concludes each year to identify any unawarded funds and allow sufficient time to select eligible recipients for those awards. The second review should be completed at the end of the awarding year, after all scholarships have been disbursed for the year, to evaluate awarding trends, resolve any discrepancies, and identify opportunities for improvement in the next awarding cycle.

Documentation and Retention Requirements

OSU's General Records Retention Schedule requires the retention of documentation regarding the eligibility, application, and selection of recipients for all scholarships awarded and administered by OSU for a minimum of three years after the award year.

At the end of each awarding cycle, OSUSD will automatically archive all application materials, scholarship review committee applicant evaluations, and scholarship recipient award information. These archival records will be retained by the Scholarship Office for a period of not less than three years after the year for which the scholarship accepted applications and/or was awarded, whichever is later.

If a scholarship review committee conducted any application review or award recipient selection processes outside of the OSUSD system, the college or academic department that manages the scholarship should be responsible for retaining records of the application materials, scholarship review committee applicant evaluations, and scholarship recipient award information for a period of not less than three years after the

year for which the scholarship accepted applications and/or was awarded, whichever is later.

Questions and Additional Resources

These *Guidelines for the Awarding of OSU Scholarships* are designed to provide general recommendations related to the administration and awarding of campus scholarships at OSU and therefore are not intended to be comprehensive or definitive. If a college, academic department, or scholarship review committee has questions about the recommendations in this document or situations that fall outside the scope of this document, they are encouraged to contact the OSU Scholarship Office at scholarship.office@oregonstate.edu or 541-737-1125.

For general information about scholarship management, OSU faculty and staff may wish to review the webinars, toolkits, and publications on the National Scholarship Providers Association's website at <https://www.scholarshipproviders.org/>. The NSPA is a nonprofit, member association that was established in 1999 to advance the collective impact of scholarship providers and the scholarships they award.