



**Scholarship Administration**  
**Guidance on Pool and Match Process**  
**May 14, 2025**

*Jointly prepared by Advancement, Compliance and Risk Management, and Student Financial Services*

This document provides guidance on how units with scholarship management duties are expected to administer and award scholarships in compliance with federal civil rights laws through the “pool and match” process using permissible award criteria, (see Appendix A: Permissible Criteria for Scholarship Awards).

**Internal Scholarships**

WSU scholarship administrators are expected to follow the “pool and match” process when awarding ALL scholarships. There are three steps to this process:

1. The scholarship administrative campus/college/unit “pools” all sources of scholarship support, including donor’s gifts that have eligibility requirements or preferences based on a protected class (see Appendix B, Protected Classes).
2. The scholarship administrator(s) determines the eligibility and award amounts for applicants, using a scholarship application process based on non-discriminatory factors, e.g. permissible criteria (see Appendix A).
3. The scholarship administrator(s) then “matches” available scholarship dollars to applicants.

Example: Scholarship administrator “matches” a female student applicant to a fund designated for women that is part of the pool, AFTER the scholarship for the student is awarded and determined based on non-discriminatory eligibility factors (see Appendix A).

Note: it is possible in this process that some awards will not “match” in any given cycle. Those awards that do not match will not be awarded in that cycle.

Scholarship administrator(s) may reach out to Student Financial Services (SFS) to administer their scholarships. Scholarship administrators must reach out to SFS if their pool is too narrow or small to administer on non-discriminatory factors. Requests to SFS must be requested to the SFS at [scholarships@wsu.edu](mailto:scholarships@wsu.edu). Administrators may follow up as needed with:

Tara Sandoval, Assistant Director: 335-9722

Heather Morgan, Associate Director: 335-7126

Joy Scourey, AVP: 335-0209

**Third Party Scholarships**

WSU units may not post or disseminate information about scholarships administered by third parties based on protected classes. Units may provide access to broad-based scholarship search

engines or other lists of scholarships. *If a unit provides a link to a search engine or list, it must include the following disclaimer:*

“WSU wants students to have access to scholarships, including from external organizations. Due to the vast number of scholarship opportunities available, students are encouraged to utilize the below external search engines or lists to access scholarships. The scholarships on these lists may be based on a wide number of factors, such as study areas and personal characteristics.”

### **Proactive Management: donations and bequests**

WSU strongly encourages all scholarship fund donations to be based on non-discriminatory criteria. If WSU receives or has funds designated for individuals based on a protected class category (see Appendix B), WSU units will coordinate with the WSU Foundation in assessing whether the fund’s governing gift instrument (Gift Use Agreement) can be revised to non-discriminatory award criteria.

All WSU units that engage with donors should inform donors of WSU’s need to comply with federal and state prohibitions on discrimination and encourage donors to consider permissible factors. (see Appendix A). Sample gift use agreements are available from the WSU Foundation, please contact Tara Howe, Senior Director, Scholarships and Gift Use Agreements, [tkhowe@wsu.edu](mailto:tkhowe@wsu.edu), 509-335-1240.

**Appendix A: Examples of Permissible Criteria for Scholarship Awards. This is not an exhaustive list. If you have a question about other criteria consult with CCR or SFS.**

- Merit
- Academic interests
- Talent
- Financial need
- Community service
- Leadership
- Career ambitions
- Campus involvement
- Socio-economic status
- Wealth
- First generation status
- International students or domestic students
- Diverse experiences
- Membership or affiliation with a federal or state recognized tribal nation (e.g. membership in a political nation)
- Individuals who have overcome substantial educational, social, or economic obstacles
- Returning students
- Number of years since an individual last attended high school or college
- Care-givers
- Core values
- Survivors of disaster
- Employees
- Degree program/academic status
- Citizens and resident aliens (or Citizens and permanent residents)
- Students with a commitment to a specific culture or history
- Geographic area (but must be careful it is not linked to national origin)(e.g. student currently residing in the Pacific Northwest is okay, but not students born in the U.S.)

**Appendix B: Protected Classes (See WSU Executive Policy 15)**

- Race
- Sex (including parental or pregnancy status)
- Sexual orientation
- Gender Identity or expression
- Religion
- Age
- Color
- Creed
- National or ethnic origin
- Marital status
- Genetic information
- Status as a protected veteran, an honorably discharged veteran, or member of the military
- Physical, mental or sensory disability, including the use of a trained service animal
- Immigration or citizenship status, except as authorized by federal or state law, regulation, or government contract