

FINANCIAL AID GUIDANCE MEMO

REFERENCE: FA 21-001
TOPIC: OHIO COLLEGE OPPORTUNITY GRANT (OCOG)
AUTHOR: TAMIKA BRASWELL, PROGRAM MANAGER
DATE: 07 JULY 2020
RELEVANT STATUTE: OHIO REVISED CODE, SECTION 3333.122

Following are some important reminders from prior guidance memos, which can be found at <http://www.ohiohighered.org/sgs/guidance-memos>.

Ohio Administrative Code

Throughout the Ohio Revised Code, there are several references to the Chancellor establishing rules for various aspects of the program. These rules are contained within the Ohio Administrative Code. The OCOG Administrative Code can be found at: <http://codes.ohio.gov/oac/3333-1-09.1v1>

EFC and Maximum Household Income

In addition to an estimated family contribution (EFC) of \$2,190 or less, students must have a household income of no greater than \$96,000 in order to qualify for OCOG. Household income is an edit we run against individual ISIR records to determine final eligibility on the eligibility queries. The field used to define household income is the FISAP Total Income (FTI) field.

State Cost of Attendance

State cost of attendance means the average cost to a student when attending an Ohio institution of higher education. For the 2020-2021 academic year, the state cost of attendance includes only instructional and general fees charged to the student, unless they otherwise qualify for foster youth status or Federal Veteran's Education benefits. These exceptions are detailed below.

General Fees

OCOG is available to use toward tuition and/or general fee charges. *For the purposes of the OCOG program*, general fees are defined as those assessed uniformly to all undergraduate students and those that *do not allow* for a waiver to be offered to any student(s). For example, a fee charged to students to provide health care coverage would not be uniformly assessed if students can opt out. Therefore, this would not be considered a general fee and would not be factored into any OCOG eligibility scenario.

***Update* Flattened OCOG**

Statute maintains that the chancellor shall determine the maximum per student award amount for each institutional sector by subtracting the sum of the maximum Pell grant and maximum expected family contribution amounts, as determined by the chancellor, from the average instructional and general fees charged by the institutional sector.

The OCOG formula takes a fixed number (average instructional and general fees charged by the institutional sector), subtracts a fixed number (Pell/EFC combo of \$6,345) and results in a fixed number (OCOG eligibility capped at the appropriate maximum award). The OCOG award chart outlines maximum per student award amounts based on institutional sector; however, each institution will not automatically receive the maximum award amount due to the interaction(s) between the Pell/EFC combo and tuition and general charges, which is the case with institutions such as **Allegheny Wesleyan, Central State University, God's Bible College, Grace College and Seminary, Shawnee State University, Trinity School of Nursing, Valor Christian College, and Western Governor's University**. Separate award amounts have been calculated for these institutions.

Influence of Other Tuition-Specific Aid

OCOG is tuition and/or general fees specific and any student receiving 100% tuition/general fees in the form of a waiver or institutional, athletic, third party, federal, or state aid is not eligible for OCOG.

For students receiving any institutional, athletic, third party, federal, or state aid that is tuition/general fees-specific but is not equal to 100% of their tuition/general fees, a simple calculation should be performed to determine final OCOG eligibility. This other tuition/general fees-specific aid must be applied prior to the OCOG award. Tuition/general fees minus tuition/general fees-specific aid equal OCOG eligibility (up to the respective maximum grant award).

State aid that is tuition/general fees specific includes the Ohio National Guard and Ohio War Orphans Scholarships. A student's Pell Grant does **not** have to be additionally factored into this equation since it has already been factored before arriving at the respective OCOG maximum grant award. *For ease of administration, a calculator is available on our website for this purpose at: <http://www.ohiohighered.org/ocog/calculators>.*

Awards at Community Colleges and Regional Campuses

Statute maintains that the Chancellor may choose to calculate the average tuition and general charges for each sector in determining eligibility for an OCOG award. Based on this calculation, the fixed Pell/EFC combo of \$6,345 continues to exceed the average tuition and general charges at community colleges and therefore, consistent with past practice, no OCOG awards will be available to students attending these institutions unless they otherwise qualify for foster youth status, Federal Veteran's Education benefits, or third term OCOG. In these instances, community college students may be eligible for up to the public main campus award amount. These exceptions are detailed below.

With the increase of the Pell award for the 2020-2021 academic year, the fixed Pell/EFC combo of \$6,345 exceeds the average tuition and general charges at university regional campuses and therefore, no OCOG awards will be available to students attending these institutions unless they otherwise qualify for Federal Veteran's Education benefits or third term OCOG. In these instances, regional campus students may be eligible for up to the public main campus award amount. These exceptions are detailed below.

Foster Youth at Community Colleges

Qualified foster youth at community colleges continue to be eligible for OCOG in academic year 2020-2021. Statute requires that their living expenses are to be added to their tuition/general fees to determine their OCOG award amount. Qualified foster youth should receive a letter from the Ohio Education and Training Voucher (ETV) Program that lists their ETV award.

To override the \$0 OCOG eligibility that will normally populate all community college students on the eligibility query, a student list must be sent to our office via the secure file transfer site, which can be found at: <https://heifx.ohiohighered.org>. The ETV letter **does not** need to be sent to our office but should be documented in case of an audit.

The living expenses to consider are the full amount contained in each student's institutional cost of attendance. If housing costs and living expenses are not included on the student's billing statement, documentation of how the student's charges were calculated or how the average cost was arrived at must be kept. In keeping with federal guidelines, the institution must keep this documentation in the event of an audit. Note that since living expenses are included in these students' state cost of attendance, *in this case*, OCOG is not tuition specific and the student may be eligible for the 2019-2020 public main campus OCOG award amount. *For ease of administration, a calculator is available on our website for this purpose at: <http://www.ohiohighered.org/ocog/calculators>.*

Third term OCOG at Community Colleges, Regional Campuses, and other qualifying institutions

For students attending year-round at a public community college, regional campus, or an institution with an adjusted award amount, statute maintains that an OCOG award may be distributed for the third term of the academic year, once Pell grants have been exhausted for that year. This exception is **only** for students that are Pell eligible. All other OCOG eligibility requirements remain. Students eligible under the dual enrollment, foster youth, or veteran provisions may receive OCOG for all terms in the academic year and are not restricted to receiving OCOG for just the third term. Please reference guidance memo FA 21-000A for specifics to awarding third term OCOG. *Note that with year-round Pell grants, an institution may find less students that would qualify for third term OCOG.*

Treatment of Federal Veterans' Education Benefits

Statute maintains allowance for a student that is receiving federal veterans' education benefits under the "All-Volunteer Force Educational Assistance Program," 38 U.S.C. 3001 et seq., or "Post-9/11 Veterans Educational Assistance Program," 38 U.S.C. 3301 et seq., or any successor program, to use their OCOG award towards their housing and living expenses, in addition to their tuition/general fees. **The Chapters included in this rule are Chapters 30, 31, 33, and the Frye Scholarship.**

The living expenses to consider are the full amount contained in each student's institutional cost of attendance. If housing costs and living expenses are not included on the student's billing statement, documentation of how the student's charges were calculated or how the average cost was arrived at must be kept. In keeping with federal guidelines, the institution must keep this documentation in the event of an audit. Note that since living expenses are included in these students' state cost of attendance, *in this case*, OCOG is not tuition specific and the student may be eligible for the 2019-2020 maximum sector OCOG award amount. *For ease of administration, a calculator is available on our website for this purpose at:* <http://www.ohiohighered.org/ocog/calculators>.

To override the \$0 OCOG eligibility that will normally populate all community college students on the eligibility query, a student list must be sent to our office via the secure file transfer site, which can be found at: <https://heifx.ohiohighered.org>. *All other sectors do not need to submit a student list as the eligibility query is already populated with the maximum award amounts.*

Dual Enrollment at University Regional Campuses

The combined number of credits for students that are enrolled at both the public university main campus and the public university regional campus can be counted toward determining a student's enrollment status for OCOG eligibility if **EITHER** (a) the majority of the credit hours (51%) are being taken at the public university main campus **OR** (b) the student is being charged *full* main campus tuition and general fee rates at the regional campus.

For example, a student enrolled in 7 credits at the public university main campus and 5 credits at the public university regional campus would be eligible for a full-time OCOG award since they are enrolled greater than or equal to 51% at the main campus. A student enrolled in 6 credits at the public university main campus and 6 credits at the public university regional campus would be eligible for a full-time OCOG award if they are being charged main campus tuition and fees. In these cases, a student attending a public university main campus can have their public university regional campus credits counted toward their OCOG enrollment status even though the university regional campus sector may not be 'OCOG eligible' under the Pell-first structure. *For ease of administration, a calculator is available on our website for this purpose at:* <http://www.ohiohighered.org/ocog/calculators>.

Financial Aid Consortiums

The combined number of credits under a financial aid consortium can be counted toward determining a student's enrollment status for OCOG if the other institution is *an approved Ohio institution*. For example, a student enrolled in 6 credits at their 'home' school and 6 credits at their 'visiting' school would be eligible for a full-time OCOG award. This applies to consortium agreements with community colleges or regional campuses as well. So a student attending a public university main campus, private non-profit institution, or private, for-profit institution can have their community college or regional campus credits under a financial aid consortium counted toward their OCOG enrollment status even though a student solely enrolled at a community college or regional campus *may not* be 'OCOG eligible' under the Pell-first structure.

However, schools should factor in the modified tuition charges for the classes taken at the visiting school. It is possible that a reduced tuition charge could make an otherwise OCOG eligible student ineligible or eligible for less OCOG in any given term if their Pell/EFC combo covers all or a larger portion of their tuition/fees due to lower charges at the visiting school. A scenario where a student would be taking *all their classes* at a 'visiting' community college under a financial aid consortium during any given term *may* yield no OCOG eligibility since their full tuition/general fees are covered by their Pell/EFC combo for that term. *For ease of administration, a calculator is available on our website for this purpose at:* <http://www.ohiohighered.org/ocog/calculators>.

Study Abroad

The 'home' school needs to maintain documentation showing courses being taken and tuition charges at the study abroad institution (if not recorded on the transcript and account statement). The documentation also needs to show that any tuition specific state funds (Ohio College Opportunity Grant, Ohio National Guard, and Ohio War Orphans Scholarship) were used for tuition and general fees only. In keeping with federal guidelines, the institution must keep supporting documentation in the event of an audit.

Bachelor's degree Programs at Community Colleges

The institution's tuition and general fees is what determines a student's eligibility for OCOG. Since there are no increases in the cost for bachelor's degree programs at community colleges, students in these programs are *not* eligible for OCOG for the 2020-2021 academic year.

Students with Intellectual Disabilities

Statute maintains that a student who is enrolled in a comprehensive transition and postsecondary program that is certified by the United States Department of Education should be considered for an OCOG award. For purposes of this section, a "comprehensive transition and postsecondary program" means a degree, certificate, or non-degree program that is designed to support persons with intellectual disabilities who are receiving academic, career, technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment as defined in 20 U.S.C. 1140." In keeping with federal guidelines, the institution must keep supporting documentation in the event of an audit.

All other OCOG eligibility must be met. No OCOG awards are generally available to students attending institutions in the community college or regional campus sector. This maintains for a student that is enrolled in a degree, certificate, or non-degree program designed to support individuals with intellectual disabilities. However, students in these programs that otherwise qualify for foster youth status, Federal Veteran's Education benefits, or third term OCOG, may be eligible for up to the public main campus OCOG award amount.

***Update* Program Approval**

OCOG is available to students in an associate's degree, first bachelor's degree, or nursing diploma program. Ohio Private, non-profit and private, for-profit institutions must hold a Certificate of Authorization (COA) through the Ohio Department of Higher Education for the on-ground or distance education program in which the student is enrolled, in order to receive OCOG. Ohio COA's can be found at <https://www.ohiohighered.org/board-of-regents/university-system-of-ohio/independent-colleges-and-universities>. Nursing diploma programs must be approved by the Ohio Board of Nursing.

An approved Pennsylvania institution must be a public-assisted institution or private, non-profit institution whose programs are eligible to receive Pennsylvania state grant funding.

Academic Progress and Course Enrollment

For OCOG eligibility, a student must be making satisfactory academic progress as determined by the institution. The enrollment level requested is dependent on credit bearing courses only, which can include remedial and repeat courses. Enrollment status definitions are: Full-time (not less than twelve credit hours per semester, quarter, or term); three-quarters-time (not less than nine and no more than eleven credit hours per semester, quarter, or term); half-time (not less than six and no more than eight credit hours per semester, quarter, or term); and one-quarter-time (not less than one and no more than five credit hours per semester, quarter, or term).

OCOG Utilization

Students are limited to 10 semesters or 15 quarters of state, need-based grant aid (including combination of OCOG and OIG). Since students can receive OCOG for less than full-time enrollment, it is important that the correct enrollment status be used when submitting a payment file (OG) in order to accurately calculate a student's remaining units of eligibility.

Under the 'remaining semesters/quarters' section of the eligibility query, students that have less than a full quarter or semester remaining means that they can receive an award for less than full-time enrollment (even if they're actually enrolled at a greater enrollment status). To convert the remaining quarters and semesters into the appropriate enrollment status, *a calculator is available on our website for this purpose at: <http://www.ohiohighered.org/ocog/calculators>.*

Continuous Enrollment

OCOG can be used for continuous enrollment which effects a student's lifetime eligibility. A student can receive a third semester or fourth quarter of funding in addition to their annual award amount. The amount the student receives in this additional term is either 1/3 (quarter terms) or 1/2 (semester terms) of the annual award.

Dual Undergraduate and Graduate Programs

OCOG is for undergraduate studies only. For students dually enrolled in a bachelor and master's program, their OCOG eligibility would be based on the number of credit hours being applied to their undergraduate courses.

Ohio Residency

A student must be an Ohio resident in order to be considered for OCOG. An internal residency override may be issued for some exceptions. All residency overrides should align with your institution's determination for in-state tuition. The Ohio Student Residency Administrative Rule can be found at: <http://codes.ohio.gov/oac/3333-1-10/>.

The OCOG eligibility query only looks at Ohio residency and not citizenship. A student that indicates on the FAFSA that they are a non-US citizen but are an Ohio resident may be considered for the grant. However, some students that indicate they are a non-US citizen, such as Deferred Action for Childhood Arrivals (DACA) students, may not be assigned a valid EFC or FISAP Total Income and therefore would not be considered for the grant as ODHE is unable to override these fields.

Verification

If a student is selected for federal verification and the determination is made that they are now eligible for OCOG, then a request can be made any time in the academic year for OCOG funds, if verification has been completed. If the determination is made that the student is no longer eligible for OCOG due to verification or verification has not been completed in that academic year for an enrolled student, then any funds requested for that academic year must be returned.

Posting of Funds

In alignment with federal policy, the institution should apply the funds requested as soon as administratively feasible but no later than three business days following the date the institution received those funds.

***Update* Refunds**

If a student becomes ineligible anytime in the academic year, the funds would need to be returned for all terms requested in that year. If a student withdraws from the institution during an academic term, the amount of the OCOG refund will be determined by the refund schedule of the institution. If a student reduces his or her enrollment to three-quarters time, one-half time, or less than half-time prior to an institution's census or "freeze" date, the OCOG allotment for the term must be reduced to the corresponding enrollment level. The OCOG admin rule does not set a timeline on how far back a refund needs to be submitted, which means that anytime a student is discovered ineligible for all or a portion of their funding, a refund needs to be submitted.

The complete refund policy can be found at: <https://www.ohiohighered.org/ocog/refund-policy>. For ease of administration, a calculator is available on our website for this purpose at: <http://www.ohiohighered.org/ocog/calculators>.

When a refund adjustment is submitted in HEI during an academic year, the refund will be captured from the next OCOG disbursement. If no further disbursements will be made for the academic year, a refund check must be submitted to our office within 30 days of submitting the refund file. If after 45 days the refund check is not submitted, the amount owed plus interest and any additional fees may be turned over to the Ohio Attorney General's Office for collection.

***Update* HEI System**

The HEI system can be found at: <https://hei.ohiohighered.org>. A WebEx demonstration can be found here: <https://www.ohiohighered.org/hei/faqs-finaid> under HEI overview. Please note that the HEI system takes dollars and cents. If the institution's system needs to round, the institution must round down as there are term caps in place.

OCOG (OG) File and Error Codes

The OG payment file format, ASCII file format, and error codes can be found at:

https://www.ohiohighered.org/content/ocog_hei_documentation

HEI Secure File Transfer Site

A student's full social security number should never be sent via e-mail. The secure file transfer site can be used to submit student listings for foster youth, federal veteran benefits, or residency overrides. It can also be used for eligibility inquiries of multiple students. This site can be found at: <https://heifx.ohiohighered.org>.

Extension Requests

Ideally, campuses will completely reconcile and submit all payment and refund requests to the Office of Financial Aid before the specific edit/submission window for any given term has closed. In the event an institution is approaching the expiration of its edit/submission window for a given term and needs additional time to reconcile and submit, an extension can be requested.

The following exceptions recognize instances beyond the control of the institutions and the Office of Financial Aid will honor extensions beyond term window submission deadlines in such cases. ***The explanation for the 7-day extension request provided through HEI must be specific in the # of students and detailed enough to reference one of the following scenarios:***

- ▶ Institution experiences an unexpected turnover with staff and therefore is unable to request the financial aid funds in the original edit/submission window.
- ▶ Student completes federal verification late (original FAFSA completion date was before the October 1 state deadline) in the academic year and becomes OCOG eligible. School applies state grant retroactively to past term(s) in which student was enrolled.
- ▶ Institution sends FAFSA data (original completion date was before the October 1 state deadline) to school late in the academic year and appears on school's roster as OCOG eligible. School applies state grant retroactively to past term(s) in which student was enrolled.
- ▶ Institution completes a special circumstance/professional judgment late (original FAFSA completion date was before the October 1 state deadline) in the academic year and student becomes OCOG eligible. School applies state grant retroactively to past term(s) in which student was enrolled.
- ▶ Institution receives an ISIR override from the Department of Higher Education late (original FAFSA completion date was before the October 1 state deadline) in the academic year and student becomes OCOG eligible. School applies state grant retroactively to past term(s) in which student was enrolled.

If the above exceptions are not applicable and an institution misses an edit/submission window, the institution may request a one-time extension in a five (5) year period. This one-time exception applies to all financial aid programs for any one term during the academic year. This exception can be used once per financial aid program. Those institutions that have missed more than one edit window for an institution code will only be allowed to request an extension for one term (chosen by the institution) per financial aid program. If your institution has missed an edit window for the above one term exception, you can submit up to a 7-day extension request.

For those institutions that receive an extension within the five (5) year period and would like to make another extension request; the Department of Higher Education will consider a one term request to those institutions at the end of the fiscal year *if* funds are available from current year appropriations.

Please note that your extension request may be denied if there are not adequate funds from current year appropriations.

**2020-2021 Award Table
Ohio College Opportunity Grant (OCOG) Program**

| OCOG 2020-2021 | | | | |
|--|--------------------------|-----------------|-----------------|-----------------|
| PUBLIC | Enrollment Status | | | |
| | Full-time | 3/4 Time | 1/2 Time | 1/4 Time |
| Community Colleges* | 0 | 0 | 0 | 0 |
| Regional Campuses* | 0 | 0 | 0 | 0 |
| Central State University Continuing Students** | \$256 | \$192 | \$128 | \$64 |
| Central State University Tuition Guarantee Cohort 1 Students** | \$656 | \$492 | \$328 | \$164 |
| Shawnee State University Continuing Students** | \$1,492 | \$1,119 | \$746 | \$373 |
| All Other Public Main Campuses | \$2,000 | \$1,500 | \$1,000 | \$500 |
| PRIVATE | Enrollment Status | | | |
| | Full-time | 3/4 Time | 1/2 Time | 1/4 Time |
| Allegheny Wesleyan** | \$456 | \$342 | \$228 | \$114 |
| God's Bible College** | \$804 | \$603 | \$402 | \$201 |
| Grace College and Seminary** | \$1,888 | \$1,416 | \$944 | \$472 |
| Trinity School of Nursing** | \$3,024 | \$2,268 | \$1,512 | \$756 |
| Valor Christian College** | \$424 | \$318 | \$212 | \$106 |
| Western Governor's University** | \$396 | \$297 | \$198 | \$99 |
| All other Private, Non-Profit | \$3,500 | \$2,625 | \$1,750 | \$875 |
| Private, For-Profit | \$1,300 | \$975 | \$650 | \$325 |
| PENNSYLVANIA | Enrollment Status | | | |
| | Full-time | 3/4 Time | 1/2 Time | 1/4 Time |
| Pennsylvania Institutions*** | \$600 or \$800 | \$300 or \$400 | \$300 or \$400 | 0 |

- ▶ All amounts reflect annual awards in \$. Appropriate annual award amount should be divided by two for semesters or three for quarters.
- ▶ Eligible students continuously enrolled may receive an additional 1/2 or 1/3 of their respective award amount in their third semester or fourth quarter.
- ▶ Students are limited to 10 semesters or 15 quarters of state, need-based grant aid (including combination of OCOG and OIG).
- +The fixed Pell/EFC combo of \$6,345 continues to exceed the average tuition and general charges at community colleges and therefore, consistent with past practice, no OCOG awards will be available to students attending these institutions unless they otherwise qualify for foster youth status, Federal Veteran's Education benefits, or third-term OCOG. These students may be eligible for up to the public main campus award amount.
- +The fixed Pell/EFC combo of \$6,345 exceeds the average tuition and general charges at university regional campuses and therefore, no OCOG awards will be available to students attending these institutions unless they otherwise qualify for Federal Veteran's Education benefits or third term OCOG. These students may be eligible for up to the public main campus award amount.
- *Eligible foster youth at community colleges may qualify for OCOG using main campus award amounts.
- *Eligible students receiving federal veterans' education benefits at community colleges and regional campuses may qualify for OCOG using main campus award amounts.
- *Eligible students attending a community college or regional campus year-round who have exhausted their Pell grant for the year, may be eligible for a main campus term award for the third term.
- ** Tuition level/costs are the determining factors in receipt of an OCOG award and therefore students at these institutions have an adjusted OCOG award amount. Students eligible under the dual enrollment, foster youth, or veteran provisions may receive OCOG for all terms in the academic year up to the main public or private, non-profit award amount. If the student attends year-round, they may be eligible for an award up to the main public or private, non-profit award amount for their third term once Pell grants have been exhausted for the academic year. Shawnee State's tuition guarantee cohorts 1 and 2 are eligible for the full public award amounts.
- ***Amounts for Ohio residents attending eligible Pennsylvania institutions-- \$600/\$300 figures to non-veterans and \$800/\$400 figures to veterans.

Financial aid personnel should direct questions to the Ohio College Opportunity Grant Program Manager, Tamika Braswell, 614.728.8862, tbraswell@highered.ohio.gov.