FINANCIAL AID GUIDANCE MEMO

REFERENCE: FA 23-001
TOPIC: OHIO COLLEGE OPPORTUNITY GRANT (OCOG)
AUTHOR: TAMIKA BRASWELL, PROGRAM MANAGER
DATE: 27 APRIL 2022
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 a check that ODHE runs 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 2022-2023 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 $6,895) 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.

*Update* Influence of Other Tuition-Specific Aid
Except for foster youth at community colleges and students receiving federal veterans’ education benefits, OCOG is tuition and/or general fees specific. Any other student receiving aid that is tuition/general fees-specific and pays 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 equals 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.

*Update* 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 2022-2023 fixed Pell/EFC combo of $6,895 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 2022-2023 academic year, the fixed Pell/EFC combo of $6,895 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.

*Update* 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 university regional campus can be counted toward determining a student’s enrollment status for OCOG eligibility. However, schools should factor in the modified tuition charges. 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.

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) most 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.
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 of the U.S. Code, Title 38, 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 maintained. 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 2022-2023 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 report, a student list must be sent to our office via the secure file transfer site, which can be found at: https://heifx.ohiohighered.org. Once the override is issued, the award amount will populate on the report for those students and an OG file can be submitted via HEI. Only community colleges need to submit a student list as the eligibility report is already populated with the maximum award amounts for other sectors.

Foster Youth at Community Colleges
Qualified foster youth at community colleges continue to be eligible for OCOG in academic year 2022-2023. 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 student records on the eligibility report, 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. Once the override is issued, the award amount will populate on the report for those students and an OG file can be submitted via HEI.

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 maintained. 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 2022-2023 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 or an institution with an adjusted award amount, including regional campuses, statute maintains that the maximum 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 up to the maximum OCOG award for all terms in the academic year and are not restricted to receiving OCOG for just the third term. Please reference guidance memo FA 23-001A 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.
**Students with Intellectual Disabilities**

Students enrolled in certificate programs are generally not eligible for OCOG, however, 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.

Since all other OCOG eligibility must be met, including the interaction of the institutions charges with the Pell/EFC combo, students attending community colleges are not eligible, unless they otherwise qualify for foster youth status, Federal Veteran’s Education benefits, or third term OCOG, and may therefore be eligible for up to the public OCOG award amount.

**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 2022-2023 academic year.

**Dual Undergraduate and Graduate Programs**

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 only.

**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.

**Program Approval**

OCOG is available to students in an associate 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/independent-schools. Nursing diploma programs must be approved by the Ohio Board of Nursing.

Ohio has a reciprocity with the state of Pennsylvania. 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.

**Ohio Residency and Citizenship**
A student must be an Ohio resident in order to be considered for OCOG. For dependent students, residency status is based on their parent’s state of residence. For independent students, student must be a resident of Ohio for 12 consecutive months. If this one-year mark is met after the initial FAFSA is filed, the HEI system will automatically give an error that residency has not been met. In this case, an override will need to be issued for the term(s) of eligibility.

There are some exceptions when a dependent or independent student may qualify for a residency override according to the Ohio Student Residency Administrative Rule, found at: http://codes.ohio.gov/oac/3333-1-10/. All residency overrides should align with your institution’s determination for in-state tuition.

The OCOG eligibility report 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.

**Financial Aid Audits**
The Ohio Revised Code authorizes the Chancellor to conduct financial aid audits of state-supported colleges and universities, proprietary, and non-profit private colleges and universities. All Ohio and Pennsylvania institutions with financial aid errors based on their prior year audit results will automatically be audited in an upcoming calendar year. Additional institutions may be audited by random selection in order to maintain our goal of auditing a set number of institutions yearly. Every institution will be audited at least once every three years. Further guidance from the Financial Aid Auditor will be forthcoming.

*Update* Selective Service
ODHE is aware of the federal implementation of the FAFSA Simplification Act’s removal of selective service regarding the receipt of federal student aid, effective June 17, 2021. Ohio revised code section 3345.32 still requires compliance with the selective service law for a student to be eligible for any of Ohio’s state grants and scholarships, subsidy, and in-state tuition. ORC 3345.32 Student Noncompliance with Selective Service can be found here: https://codes.ohio.gov/ohio-revised-code/section-3345.32.

As such, ODHE still requires that students comply with selective service registration before funds are requested for the term, and documentation maintained as part of the audit process. For birthdays that fall after the FAFSA filing and before a term start date – an institution is required to check registration prior to requesting any state aid for a term after the 18th birthday.

If Ohio legislation is changed, ODHE will inform the campuses.

**Academic Progress and Course Enrollment**
For OCOG eligibility, a student must be making satisfactory academic progress as determined by the institution.

OCOG is for undergraduate studies only. 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) to accurately calculate a student’s remaining units of eligibility.

Under the ‘remaining semesters/quarters’ section of the eligibility report, 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](http://www.ohiohighered.org/ocog/calculators). The institution would need to submit a payment file using the converted enrollment status and amount. This will exhaust their eligibility.

**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.

**Certification**
Eligibility reports for the 2022-2023 academic year are currently available under the Reports tab of HEI. The submission windows are based on each institution’s academic calendar dates which open 15 days after the start of the term and close 30 days afterwards. Calendar dates can be viewed or set under the Institution Management tab of HEI.

*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.*

**Update* 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. OCOG funds must be applied towards a student’s account for tuition and general fees and cannot be refunded to the student. If OCOG exceeds these charges, the institution will need to refund the overage to ODHE.

**Refunds**
If a student becomes ineligible anytime in the academic year due to EFC or income, the funds will 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](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](http://www.ohiohighered.org/ocog/calculators).

When submitting the adjustment in HEI, the award amount will be the amount you are returning, and the award type will be ‘reduction’. When a refund adjustment is submitted during the current academic year, the refund will be captured from the next OCOG disbursement. If no further disbursements will be made for the academic year or if it’s a previous year’s return, 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.
Verification
If the determination is made that the student is no longer eligible for OCOG due to verification, then any funds requested for that academic year must be returned. If verification has not been completed in that academic year for an enrolled student due to the COVID-19 federal waiver, no changes to OCOG are required. If the enrolled student does not fall under the COVID-19 federal waiver and verification has not been completed in that academic year for an enrolled student, then any funds requested for that academic year must be returned.

*Update* ISIR Corrections
Eligibility is based on the latest ISIR transaction received and ODHE cannot ‘lock’ a previous ISIR. If an update was made after verification or a special circumstance was granted, there was a graduate level change mid-year, or student removed your institutions school code, a correction must be submitted on the FAFSA for the student to reappear as eligible on the institution’s eligibility report. Allow 3 days for any ISIR corrections to be reflected.

HEI System Access
The HEI system can be found at: https://hei.ohiohighered.org. An institution’s financial aid liaison is responsible for granting access to individuals on their campus. Please see the HEI Authorization Manual for detailed instructions. The Manual and a WebEx demonstration of the HEI system can be found here: https://www.ohiohighered.org/hei/faqs-finaid.

OCOG (OG) File Documentation
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 inquires of multiple students. The secure site can be found at: https://heifx.ohiohighered.org.

Extension Requests
Extension requests can be submitted under the Institution Management tab of HEI. 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 for the current academic year. 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 eligibility report 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 for the current academic year. 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.
## 2022-2023 Award Table
### Ohio College Opportunity Grant (OCOG) Program

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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 $6,895 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 $6,895 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.

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