

Application for Potential 401(a) Alternative Retirement Plan Vendors— Analysis and Recommendations

Ohio Department of Higher Education

Aon Hewitt
Retirement and Investment

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Project Background

- Ohio Department of Higher Education (“ODHE”) engaged Aon Hewitt Investment Consulting (“AHIC”) as an outside independent consultant to manage the application process for potential 401(a) Alternative Retirement Plan (“ARP (401(a))”) vendors
- In coordination with ODHE, AHIC created the application to review all current entities providing investment options to the ARP (401(a)) and evaluate any new potential entities that submitted an application
 - The application contains the requirements as stated in Ohio Revised Code 3305.03 (“Code”) and questions to determine if the vendor meets those requirements
- The application was posted to the ODHE website for Grant Resources and Requests for Proposals on **November 2, 2015**
- Vendors were allowed to submit question until **December 2, 2015** and formal responses were posted to the website on **December 9, 2015**
- All vendors wanting to participate in the application process submitted their completed applications by **January 8, 2015**
 - Great American Insurance Group, a current vendor, did not submit an application by January 8th and was sent notice on January 13th. Following the required 15 day window, they had still not submitted an application. Therefore, in accordance with the Code, Great American will have their approved status revoked and will not be permitted to provide investment options for ARP (401(a)) going forward
 - Security Benefit, a potential vendor, submitted an application, but later rescinded the application upon being notified of the \$5,000 application fee

Project Background (cont.)

- In accordance with the Code, written notice was provided to each public university informing them of which vendors submitted an application, withdrew their application, or had not submitted a completed application in accordance with the requirements on **February 1, 2016**
- Following the written notice, there was a 30 day comment period from **February 1, 2016 through March 2, 2016** for the universities to submit comments and/or to request a meeting with the ODHE concerning the application or review. There were no requests for a meeting and the following are the comments that were submitted:
 - “We use Retirement Manager as our common remitter for ARP. Several of the vendors (Nationwide, Lincoln) are not very timely when processing manual corrections. I'm not sure if they understand fully how the system works.” (*Miami University*)
 - “Over the years, we have had administrative issues with Nationwide. They don't seem to realize the plan is a 401(a) and put funds in a 403(b) instead. We have spent numerous hours with their customer service team to resolve issues only to find out that they went back to processing them incorrectly. I find them difficult to work with.” (*Cuyahoga Community College*)
 - “The ARP vendor list is diverse and comprised of well-known investment and insurance companies. Thanks for sharing it.” (*Stark State College*)
 - “We have one employee with Great American. What is the status of their application? If Great American is revoked, our assumption is he will need to start contributing to a new carrier. Is that correct?” (*Sinclair Community College*)
- This report provides an analysis of the information submitted by the vendors in their application (as well as any subsequent follow-ups) and AHIC’s recommendations for vendors’ designation status based solely on this information

Vendors Submitting Applications

Current Vendors	Potential Vendors
AXA	National Life Group
Fidelity Investments	Security Benefit (<i>Rescinded prior to evaluation</i>)
Lincoln Financial Group	
MassMutual Financial Group*	
MetLife	
Nationwide	
TIAA	
VALIC	
Voya Financial	

*MassMutual Financial Group acquired The Hartford's retirement plans business

Note: Current vendor Great American Insurance Group did not submit an application

Summary of Recommendations

Recommendation Criteria

Recommend with no strong areas of concern	No Strong Areas of Concern in responses
Recommend with limited strong areas of concern	No more than 1 Strong Area of Concern in responses
Do <u>not</u> recommend due to strong areas of concern	More than 1 Strong Area of Concern in responses

Recommend with no strong areas of concern	Recommend with limited strong areas of concern	Do <u>not</u> recommend due to strong areas of concern
Current Vendors		
Fidelity Investments	AXA	MetLife
TIAA	Lincoln Financial Group	
VALIC	MassMutual Financial Group	
	Nationwide	
	Voya Financial	
Potential Vendors		
		National Life Group

Note: Great American Insurance Group, a current vendor, did not submit an application. Therefore, in accordance with the Code, Great American will have their approved status revoked and will not be permitted to provide investment options for ARP (401(a)) going forward

Summary of AHIC Analysis of Vendor Responses

	Current									Potential
	AXA	Fid	LFG	MM	ML	NW	TIAA	VAL	Voya	NLG
Requirement #1	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Requirement #2	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Requirement #3	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green
Requirement #4	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red
Requirement #5	Yellow	Green	Yellow	Red						
Requirement #6	Green	Yellow	Yellow	Green	Red	Green	Green	Green	Yellow	Yellow
Requirement #7	Red	Green	Red	Red	Red	Red	Green	Green	Red	Red
Requirement #8	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green
Requirement #9	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Grey
Requirement #10	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Green	Green	Green
Requirement #11	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Green
Requirement #12	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Yellow	Green

- No areas of concern for an entity's ability to meet the requirement
- Area of concern for an entity's ability to meet the requirement
- Strong area of concern for an entity's ability to meet the requirement
- N/A – Question only applies to current vendors

Details of AHIC Analysis of Vendor Responses

	Current									Potential
	AXA	Fid	LFG	MM	ML	NW	TIAA	VAL	Voya	NLG
Requirement #1										
Requirement #2										
Requirement #3(a)										
Requirement #3(b)										
Requirement #4										
Requirement #5(a)										
Requirement #5(b)										
Requirement #5(c)										
Requirement #6(a)										
Requirement #6(b)										
Requirement #6(c)										
Requirement #7(a)										
Requirement #7(b)										

- No areas of concern
- Strong area of concern
- Area of concern
- N/A – Question only applies to current vendors

Details of AHIC Analysis of Vendor Responses

	Current									Potential
	AXA	Fid	LFG	MM	ML	NW	TIAA	VAL	Voya	NLG
Requirement #8(a)										
Requirement #8(b)										
Requirement #8(c)										
Requirement #9										
Requirement #10(a)										
Requirement #10(b)										
Requirement #11										
Requirement #12(a)										
Requirement #12(b)										
Requirement #12(c)										

- No areas of concern
- Area of concern
- Strong area of concern
- N/A – Question only applies to current vendors

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
1. The entity must be authorized to conduct business in the State of Ohio with regard to the investment options to be offered under an alternative retirement plan maintained by a public institution of higher education	Answered “Yes,” that the entity is authorized to conduct business in the State of Ohio with regard to the investment options currently offered under the ARP (401(a))	N/A	Answered “No,” that the entity is not authorized to conduct business in the State of Ohio with regard to the investment options currently offered under the ARP (401(a))
2. The experience of the entity providing investment options in the State of Ohio or other states under alternative retirement plans, optional retirement plans, or similar types of plans that meet <u>one</u> of the requirements	Meets one or both requirements	N/A	Does not meet at least one requirement

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
3. The potential effectiveness of the entity in recruiting eligible employees to select that entity for purposes of participating in an alternative retirement plan and in retaining those employees' accounts	Participant count from 2013 to 2014 (only data we have for all providers) increased or declined by less than 10%	Participant count from 2013 to 2014 decreased by greater than 10%	N/A
	Entity provides one-on-one meetings	Entity does not provide one-on-one meetings	N/A
4. Whether the entity intends to offer a broad range of investment options to the electing employees	Investment line-up includes*: <ul style="list-style-type: none"> ▪ Money Market / Stable Value / Fixed Annuity option ▪ Bond option ▪ Balanced / Lifecycle option ▪ Equity option 	N/A	Missing at least one investment option type*

*The review of the investment line-up assumes that if an investment option is available for one university with an entity, it is available for all universities with that entity

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
5. The suitability of the investment options to the needs and interests of the electing employees and their beneficiaries	No front end, back end, or surrender charges on the investment options	Has front end, back end, or surrender charges on the investment options, but there are exceptions to waive charges	Has front end, back end, or surrender charges on the investment options, but there are no exceptions to waive charges
	No withdrawal restrictions on the investment options	Has withdrawal restrictions on the investment options, but the restrictions are on the fixed option only	Has withdrawal restrictions on investment options other than the fixed option
	Proactively reviews the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available	Does not proactively review the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available	N/A

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
6. The capability of the entity to offer sufficient information to the electing employees and their beneficiaries to make informed decisions with regard to investment options offered by the entity	Participant education materials submitted clearly disclose each investment option's characteristics and expenses	Participant education materials submitted clearly disclose each investment option's characteristics or expenses, but not both	Participant education materials submitted does not clearly disclose each investment option's characteristics or expenses
	Investment option information available via both website and call center/in-person representative	Investment option information available via website or call center/in-person representative, but not both	Investment option information not available via website or call center/in-person representative
	Participants are informed of potential liquidity restrictions and/or redemption fees via a pop-up on the website and call center representatives OR: Investment options do not have liquidity restrictions or redemption fees	Participants are informed of potential liquidity restrictions and/or redemption fees via a pop-up on the website or call center representative, but not both	Participants are not informed of potential liquidity restrictions and/or redemption fees via a pop-up on the website or call center representative

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
7. The capability of the entity to perform in a manner that is in the best interests of the electing employees and their beneficiaries	Fiduciary information reviewed but not scored		
	Employees and/or subcontractors servicing the ARP (401(a)) are not compensated by means which may be a potential conflict of interest (e.g., commissions)	N/A	Employees and/or subcontractors servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest (e.g., commissions)
	Does not promote or solicit other non-ARP (401(a)) products to plan participants (exception is other Ohio related plans)	N/A	Promotes or solicits other non-ARP (401(a)) products to plan participants

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
8. The fees and expenses associated with the entity's investment options and the manner in which the entity intends to disclose those fees and expenses	Sufficient information regarding fees is made available to participants (or the entity is willing to make information available) on website and/or statement	N/A	Sufficient information regarding fees is not made available to participants (or the entity is not willing to make information available) on website and/or statement
	Currently provides an annual fee disclosure for each university	Does not currently provide an annual fee disclosure for each university, but is willing to	Does not currently provide an annual fee disclosure for each university, and is not willing to
	Currently meets with each university annually to review fees	Does not currently meet with each university annually to review fees, but is willing to	Does not currently meet with each university annually to review fees, and is not willing to

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
9. The rights and benefits to be provided under the investment options	Investment vehicle information reviewed but not scored		
	Notifies universities of availability of funds and what may drop off or have significant impact on the population	Does not disclose how they notify universities of availability of funds and what may drop off or have significant impact on the population	N/A
10. The capability of the entity to provide the rights and benefits under the investment options	Third party provider information reviewed but not scored		
	Entity or any advisor has not been found guilty of any violations of security regulations	Entity or any advisor has been found guilty of violations of security regulations	N/A
	Has not been party to any lawsuits regarding the timeliness of distributions, payments, and transfers	Has been party to lawsuits regarding the timeliness of distributions, payments, and transfers	N/A
11. Comments submitted by a public institution of higher education under section 3305.031 of the Revised Code	No negative comment referencing entity submitted by a public institution of higher education	Negative comment referencing entity submitted by a public institution of higher education	N/A

Evaluation Criteria for ARP (401(a)) Requirement

Requirement	No areas of concern	Area of concern	Strong area of concern
12. Any other information the chancellor, or consultant selected by the chancellor, deems relevant,	IRA rollover information reviewed but not scored		
	Is currently meeting with each university annually to discuss investment options, communications, and participant enrollment / engagement	Is not currently meeting with each university annually to discuss investment options, communications, and participant enrollment / engagement, but is willing to	Is not currently meeting with each university annually to discuss investment options, communications, and participant enrollment / engagement, and is not willing to
	Performance standards commit to processing distributions, payments, and transfers within 2 days	Performance standards commit to processing distributions, payments, and transfers in greater than 2 days	N/A
Willing to contractually commit to service guarantees related to the timeliness of distributions, payments, and transfers	N/A	Not willing to contractually commit to service guarantees related to the timeliness of distributions, payments, and transfers	

Vendor Details

Recommendation: **Recommend with limited strong areas of concern**

Strong Areas of Concern:

- AXA Advisors Financial Professionals servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Does not proactively review the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available, but is willing to
- Entity or advisor has been found guilty of violations of security regulations

Fidelity Investments

Recommendation:

Recommend with no strong areas of concern

Areas of Concern:

- Participant education materials do not clearly disclose each investment option's expenses
- Entity or advisor has been found guilty of violations of security regulations
- Party to lawsuits regarding the timeliness of distributions, payments, and transfers

Lincoln Financial Group

Recommendation: **Recommend with limited strong areas of concern**

Strong Areas of Concern:

- Lincoln Financial Advisors servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Investment options contain surrender charges, but there are exceptions to waive charges
- Investment options have withdrawal restrictions, but the restrictions are on the fixed option only
- Does not proactively review the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available
- Participant education materials do not clearly disclose each investment option's expenses
- Does not currently provide an annual fee disclosure to each university, but is willing to
- Does not currently meet with each university annually to review fees, but is willing to
- Does not currently meet with each university annually to discuss investment options, communications, and participant enrollment/engagement, but is willing to
- Negative comment referencing entity submitted by a public institution of higher education

MassMutual Financial Group

Recommendation: **Recommend with limited strong areas of concern**

Strong Areas of Concern:

- MassMutual works with advisors servicing the ARP (401(a)) who are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Investment options have withdrawal restrictions, but the restrictions are on the fixed option only
- Does not proactively review the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available, but is willing to
- Does not currently meet with each university annually to review fees, but is willing to
- Does not currently meet with each university annually to discuss investment options, communications, and participant enrollment/engagement, but is willing to

Recommendation: **Do not recommend due to strong areas of concern**

Strong Areas of Concern:

- Does not notify participants prior to investment of potential liquidity restrictions and/or redemption fees
- MetLife Financial Service Representatives servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Participant count decreased 14% from 2013 to 2014
- Investment options contain front end, back end, and/or surrender charges, but there are exceptions to waive charges
- Does not currently provide an annual fee disclosure to each university, but is willing to
- Does not currently meet with each university annually to review fees, but is willing to
- Does not currently meet with each university annually to discuss investment options, communications, and participant enrollment/engagement, but is willing to

Nationwide

Recommendation: **Recommend with limited strong areas of concern**

Strong Areas of Concern:

- Nationwide employees servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Investment options contain surrender charges, but there are exceptions to waive charges
- Investment options have withdrawal restrictions, but the restrictions are on the fixed option only
- Does not proactively review the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available
- Does not currently provide an annual fee disclosure to each university, but is willing to
- Does not currently meet with each university annually to review fees, but is willing to
- Does not disclose how the universities are notified of availability of funds and what may drop off or have significant impact on the population
- Entity or advisor has been found guilty of violations of security regulations
- Party to lawsuits regarding the timeliness of distributions, payments, and transfers
- Does not currently meet with each university annually to discuss investment options, communications, and participant enrollment/engagement, but is willing to
- Performance standards commit to processing distributions, payments, and transfers in greater than 2 days
- Negative comment referencing entity submitted by a public institution of higher education

Recommendation:

Recommend with no strong areas of concern

Areas of Concern:

- Investment options contain surrender charges, but there are exceptions to waive charges
- Investment options have withdrawal restrictions, but the restrictions are on the fixed option only
- Does not currently provide an annual fee disclosure to each university, but is willing to
- Does not currently meet with each university annually to review fees, but is willing to
- Party to lawsuits regarding the timeliness of distributions, payments, and transfers
- Performance standards commit to processing distributions, payments, and transfers in greater than 2 days

VALIC

Recommendation:

Recommend with no strong areas of concern

Areas of Concern:

- Investment options have withdrawal restrictions, but the restrictions are on the fixed option only
- Does not proactively review the investment options offered under the ARP (401(a)) with the universities to assure they are in the cheapest share class available
- Does not currently provide an annual fee disclosure to each university, but is willing to

Recommendation: **Recommend with limited strong areas of concern**

Strong Areas of Concern:

- Voya employees servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Investment options have withdrawal restrictions, but the restrictions are on the fixed option only
- Participant education materials do not clearly disclose each investment option's expenses
- Does not currently meet with each university annually to discuss investment options, communications, and participant enrollment/engagement, but is willing to

National Life Group

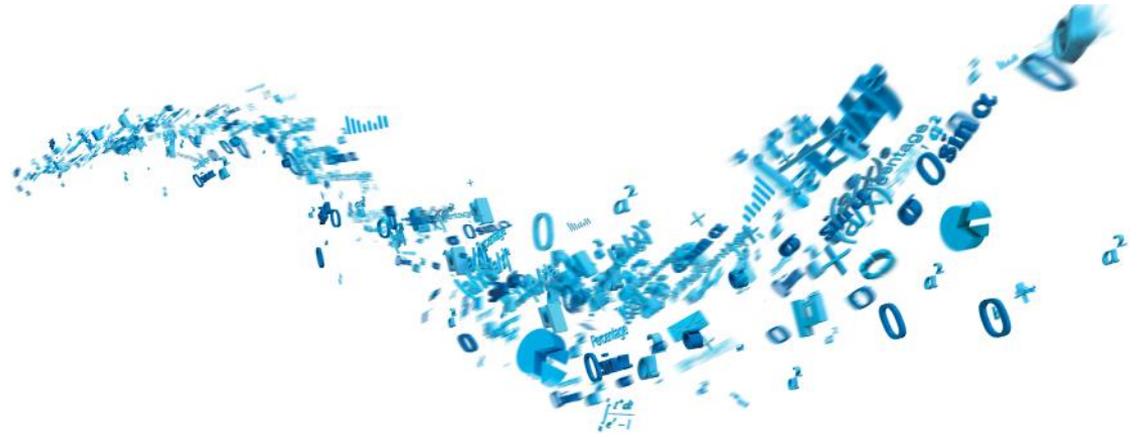
Recommendation: **Do not recommend due to strong areas of concern**

Strong Areas of Concern:

- Single investment option submitted (does not provide a broad range of investment options) and did not disclose fees related to the investment option
- Investment options contain surrender charges, but there are no exceptions to waive charges
- Investment options other than the fixed option have withdrawal restrictions on investment options
- Employees servicing the ARP (401(a)) are compensated by means which may be a potential conflict of interest

Areas of Concern:

- Participant are informed of potential liquidity restrictions and/or redemption fees via call center representative, but not a pop-up on the website



Appendix 1: Supplemental Application Information

Supplemental Application Information

Fiduciary Information: Does your organization act as a fiduciary in regards to the investment advice and guidance provided to ARP (401(a)) participants?

AXA	AXA does not directly act as a fiduciary as it relates to participant advice and guidance, but can offer plan level fiduciary coverage through Wilshire
Fid	Fidelity will only act as a fiduciary for managed accounts
LFG	Lincoln Financial Group and Lincoln Financial Advisors do not act as fiduciaries or provide explicit advice
MM	MassMutual does not act as a fiduciary, but can provide participant level advice and/or managed accounts through Envestnet (for a fee)
ML	MetLife and their representatives do not act as fiduciaries
NW	Nationwide does not act as fiduciary
TIAA	TIAA is the only vendor who will act as a fiduciary in regards to the investment advice and guidance provided to ARP (401(a)) participants
VAL	VALIC will only act as a fiduciary for managed accounts
Voya	Voya and their financial advisors do not act as fiduciaries regarding advice/guidance provided to participants
NLG	National Life Group does not act as fiduciary as it relates to the participants advice and guidance (although OBS Financial would serve as the fiduciary for the plan under the amended offering if accepted)

Supplemental Application Information

Investment Vehicle Information: Specify the investment vehicles utilized today under the ARP (401(a))

AXA Group Contract

Fid Combination (Individual Contracts and Group Contract)

LFG Individual Contracts

MM Group Contract

ML Group Contract

NW Individual Contracts

TIAA Individual Contracts

VAL Individual Contracts

Voya Combination (Individual Contracts and Group Contract)

NLG Individual Contracts

Supplemental Application Information

Alternate Investment Proposal Information: As part of their application submission, did the vendor provide an alternate investment or fee proposal?

AXA	AXA provided an alternate Retirement Gateway Fund Line-up proposal
Fid	Fidelity did not provide an alternate investment proposal, but they will give ODHE the option to select any publicly traded mutual fund presently open to investment
LFG	Lincoln provided an alternate line-up proposal, the Lincoln Alliance mutual fund platform
MM	No proposal provided, but MassMutual indicated that they will continue offering a group contract and registered funds will also be available
ML	No proposal provided, but MetLife did provide optional services and fees
NW	Nationwide provided an alternate line-up proposal, the Retirement Flexible Advantage program
TIAA	TIAA provided an alternate line-up proposal, offering their mutual fund platform for all universities
VAL	No proposal provided
Voya	Voya provided an alternate enhanced pricing proposal, lowering the WRAP fees from 100 bps to 60 bps for new employees going forward
NLG	National Life Group provided an amended line-up proposal, including mutual funds through the Balanced Opportunities open architecture platform, but it was submitted after the January 8 th deadline for completed applications. AHIC, with ODHE general counsel, determined that this revised submission would not be accepted and National Life Group would be evaluated based on their original proposed line-up



Appendix 2: Current Vendors and Utilization by University

Current Vendors and Utilization by University

- In the table below, we identify the current vendors to the State's public institutions of higher education, as provided by the current vendors during the application process

University	AXA	Fidelity	Great American (Not Available)	Lincoln	MassMutual	MetLife	Nationwide	TIAA-CREF	VALIC	Voya
Bowling Green State	AXA	Fidelity	Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
Central State			Great American (Not Available)					TIAA-CREF	VALIC	Voya
Cleveland State	AXA		Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
Kent State	AXA		Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
Miami University	AXA		Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
Northeast Ohio Medical			Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
The Ohio State	AXA	Fidelity	Great American (Not Available)	Lincoln	MassMutual		Nationwide	TIAA-CREF	VALIC	Voya
Ohio University	AXA		Great American (Not Available)	Lincoln	MassMutual	MetLife	Nationwide	TIAA-CREF	VALIC	Voya
Shawnee State			Great American (Not Available)					TIAA-CREF	VALIC	Voya
University of Akron	AXA		Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
University of Cincinnati	AXA	Fidelity	Great American (Not Available)	Lincoln		MetLife	Nationwide	TIAA-CREF	VALIC	Voya
The University of Toledo	AXA		Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
Wright State University	AXA	Fidelity	Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
Youngstown State University	AXA	Fidelity	Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya
2-year/Community Colleges	AXA	Fidelity	Great American (Not Available)	Lincoln			Nationwide	TIAA-CREF	VALIC	Voya

Current Vendors and Utilization by University— 2-Year/Community Colleges

University	AXA	Fidelity	Great American (N/A)	Lincoln	MassMutual	MetLife	Nationwide	TIAA-CREF	VALIC	Voya
Belmont Technical College										
Central Ohio Technical College										
Cincinnati State Technical										
Clark State Community College										
Columbus State Community College										
Cuyahoga Community College										
Eastern Gateway Community College										
Edison State Community College										
Hocking Technical College										
James Rhodes State College										
Lake County Community College										
Lakeland Community										
Lorain County Community College										
Lima Technical College										
Marion Technical College										
Medical College of OH										
North Central State College										
Northwestern State										
Owens State Community College										
Sinclair Community College										
Southern State Community College										
Stark State College										
Terra Community College										
Washington State Community College										
Zane State College										

