FINANCIAL AID GUIDANCE MEMO

REFERENCE: FA 17-001
TOPIC: OHIO COLLEGE OPPORTUNITY GRANT (OCOG)
AUTHOR: TAMIAKA BRASWELL, PROGRAM MANAGER
DATE: 31 MARCH 2016
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 Ohio Revised Code, there are several references to the Chancellor establishing rules for various aspects of the program. These rules are the Ohio Administrative Code. The OCOG Administrative Code can be found at: http://www.registerofohio.state.oh.us/pdfs/3333/0/1/3333-1-0951_PH_OF_N_RU_20100319_1637.pdf.

Maximum Household Income
In addition to an estimated family contribution (EFC) of 2190 or less, students must have a household income of no greater than $75,000 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.

Flattened OCOG
Statute maintains the requirement that a student’s Pell grant and EFC must be applied toward tuition/general fees before the OCOG award can be determined. The flattened OCOG scale is a direct result of the Pell/EFC first concept. This OCOG formula recognizes that Pell awards have already ‘leveled the playing field’ and provide each student with an equal amount of ‘buying power’ (Pell/EFC combo). A flattened OCOG scale maintains this equalization.

In essence, the OCOG formula takes a fixed number (tuition/general fees), subtracts a fixed number (Pell/EFC combo of $5,815) and results in a fixed number (OCOG eligibility capped at the appropriate maximum award).

Influence of other Tuition-Specific Aid
OCOG is tuition/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. Examples of state aid that cover 100% of tuition/general fees at public institutions are the National Guard Scholarship and the Safety Officers Memorial Scholarship.

For students receiving any tuition/general fees-specific aid 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).

A student’s Pell Grant does not have to be 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.
General Fees
OCOG is available to use toward tuition and general fee charges. For the purposes of the OCOG program, general fees are defined as those assessed uniformly to all 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 considered to 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.

Treatment of Federal Veterans’ Education Benefits

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 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, please use the 'Remaining OCOG Eligibility' calculator on the front page of the eligibility query. For ease of administration, a calculator is also available on our website for this purpose.

Continuous Enrollment
OCOG can be used for continuous enrollment, meaning that 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. Students are limited to 10 semesters or 15 quarters of state, need-based grant aid (including combination of OCOG and OIG).

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 and at least half of the credit hours (50%) are being taken at the public university main 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 since they are enrolled 50% at the main campus and are being assessed total tuition equal to 12 main campus credit hours. 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.

A scenario where the student is taking less than 50% of the credits at a public university main campus would yield no OCOG eligibility unless the student is being charged the main campus tuition charges since typically the university regional campus sector is not ‘OCOG eligible’ under the Pell-first structure. For ease of administration, a calculator is available on our website for this purpose.
**Foster Youth at Community Colleges**

Qualified foster youth at community colleges continue to be eligible for OCGO for 2016-2017. Statute requires that for otherwise OCGO eligible students, their living expenses are to be added to their tuition/general fees to determine their OCGO award amount. Qualified foster youth should receive a letter from the Ohio Education and Training Voucher (ETV) Program that lists their ETV award. A scanned copy of this letter must be sent to our office in order to override the $0 OCGO eligibility that will normally populate all community college students on the eligibility query.

Assuming the living expenses plus tuition/general fees exceed $7,231 ($5,815 plus $1,416) for the academic year, these community college foster youth could be eligible for the 2016-2017 maximum public OCGO amount of $1,416. The living expenses to consider are the full amount contained in each student’s institutional cost of attendance. Note that since living expenses are included in these students’ state cost of attendance, in these cases only, OCGO is not tuition specific. *For ease of administration, a calculator is available on our website for this purpose.*

**Third-term OCGO at Community Colleges, Regional Campuses, and other qualifying institutions**

Qualified students attending year-round at a public community college, regional campus, or an institution with an adjusted award amount continue to be eligible for OCGO for 2016-2017. Statute states that an OCGO 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 OCGO eligibility requirements remain. Please reference guidance memo FA 17-001A for specifics to awarding third-term OCGO.

*Updated* **Financial Aid Consortiums**

The combined number of credits under a financial aid consortium can be counted toward determining a student’s enrollment status for OCGO 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 OCGO 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 OCGO enrollment status even though a student solely enrolled at a community college or regional campus may not be ‘OCGO 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 OCGO eligible student ineligible or eligible for less OCGO 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 of their classes at a ‘visiting’ community college under a financial aid consortium during any given term may yield no OCGO 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.*

**Study Abroad**

The ‘home’ school needs to have paperwork showing courses being taken and tuition charges at the study abroad institution (if not recorded on the transcript and account statement). The paperwork also needs to show that any tuition specific state funds (Ohio College Opportunity Grant, Ohio National Guard, Ohio Safety Officers College Memorial Fund, and Ohio War Orphans Scholarship) were used for tuition and general fees only. The ‘home’ school must keep the above documentation in case of an audit.
Ohio Residency
Beginning in the 2015-2016 academic year, 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.

For OCOG consideration, a dependent student’s residency status is based on their parent’s state of residence. If the institution considers the student an OH resident but the parent is not, a residency override may be issued for the student if; 1) The parent recently moved out of state and the student did not break OH residency; 2) At least one of their parents or legal guardians has been an OH resident for 12 consecutive months preceding the student’s enrollment or; 3) the parent or legal guardian, as of the first day of a term of enrollment, has accepted full-time, self-sustaining employment and established domicile in the state of Ohio for reasons other than gaining the benefit of favorable tuition rates. An internal residency override may be issued for these students if one of the above exceptions is met.

An independent student that has been a resident of OH for 12 consecutive months is considered an OH resident. However if this one year mark is met after the initial FAFSA is filed, the HEI system will automatically give an error that the student is not a resident. An internal residency override may be issued for any terms in the academic year after the one-year mark is met.

Upon moving to Ohio, veterans with one year of honorable service (and their dependents) are immediately considered in-state residents for the purposes of tuition, state educational subsidies, and financial aid. An internal residency override may be issued for these students.

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/.

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 the determination is made that the student is no longer eligible for OCOG 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.

If a student leaves the institution after funds have been requested and is selected for federal verification that has not been completed, the institution is not required to return the funds, providing the student’s latest ISIR is OCOG eligible.

Refunds
Since OCOG is tuition and general fees specific, a portion of OCOG must be refunded if a student drops a class or withdraws entirely and is refunded all or a portion of their tuition/general fees. However, if a student receives no refund of tuition/general fees, no OCOG refund is necessary. 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.

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.
*New* **OCOG Error Codes**
The OCOG edit messages and error codes for the eligibility query have been updated and can be found at https://www.ohiohighered.org/node/1945.

The edit and load specifications for the OG payment file have been updated and can be found at https://www.ohiohighered.org/content/edit_load_specifications_ohio_college_opportunity_grant_og_file.

**HEI Secure File Transfer Site**
A student’s full social security number should never be sent in an e-mail. The secure file transfer site can be used to submit any secure documents such as scanned social security cards and driver licenses for purposes of verification or for ETV forms. It can also be used for inquiries of multiple students for reasons such as residency overrides. This site can be found at https://qry.regents.state.oh.us/cgi/hei_secure_file_transfer_cgi. Please note that the HEI secure file transfer site may soon be updated. Institutions will be notified if any changes occur.

**OCOG Calculators**
For ease of administration, calculators for computing tuition specific aid, OCOG utilization, dual enrollment, consortium agreements, foster youth eligibility, and refunds can be found at http://www.ohiohighered.org/ocog/calculators.

*Updated* **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.

Going forward with the 2016-2017 academic year, if the previous 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.

Going forward with the 2016-2017 academic year, 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.
**Award Chart**

**2016-2017 Award Table**

**Ohio College Opportunity Grant (OCOG) Program**

Ohio residents in a degree (associate/first bachelors) or nurse diploma program with an EFC of 2190 or less and a maximum household income of $75,000:

<table>
<thead>
<tr>
<th>OCOG 2016-2017</th>
<th>Enrollment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full-time</td>
</tr>
<tr>
<td><strong>PUBLIC</strong></td>
<td></td>
</tr>
<tr>
<td>Community Colleges*</td>
<td>0</td>
</tr>
<tr>
<td>Regional Campuses*</td>
<td>0</td>
</tr>
<tr>
<td>Central State**</td>
<td>432</td>
</tr>
<tr>
<td>All Other Main Campuses</td>
<td>1416</td>
</tr>
<tr>
<td><strong>PRIVATE, NON-PROFIT</strong></td>
<td></td>
</tr>
<tr>
<td>Allegheny Wesleyan**</td>
<td>984</td>
</tr>
<tr>
<td>God’s Bible College**</td>
<td>1224</td>
</tr>
<tr>
<td>Trinity School of Nursing**</td>
<td>2568</td>
</tr>
<tr>
<td>All Other Private, Non-Profit</td>
<td>2832</td>
</tr>
<tr>
<td><strong>OTHER</strong></td>
<td></td>
</tr>
<tr>
<td>Private, For-Profit</td>
<td>1056</td>
</tr>
<tr>
<td>Pennsylvania Institutions***</td>
<td>600 or 800</td>
</tr>
</tbody>
</table>

► 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).

* Students at community colleges and university regional campuses are not excluded from the Ohio College Opportunity Grant program. However, tuition level/costs are the determining factor in receipt of an OCOG award, regardless of technical eligibility. Therefore students in this sector have a $0 OCOG award amount unless the student attends an eligible institution year-round. In this case only, an award up to the public award amount may be distributed for the third term in the academic year once Pell grants have been exhausted for the academic year.

** 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. If the student attends year-round, they may be eligible for an award up to the public or private, non-profit award amount for their third term once Pell grants have been exhausted for the academic year.

***Amounts for Ohio residents attending eligible Pennsylvania institutions-- $600/$300 figures apply to non-veterans and $800/$400 figures apply 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.