

John R. Kasich, Governor John Carey, Chancellor

FINANCIAL AID GUIDANCE MEMO

REFERENCE: FA 18-001

TOPIC: OHIO COLLEGE OPPORTUNITY GRANT (OCOG)
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DATE: **14 JULY 2017**

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

*Update*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 \$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.

*Update*Flattened OCOG

Statute maintains the requirement that a student's Pell grant and EFC combo must be applied toward tuition and general charges before the student's specific OCOG award amount can be determined.

In determining the maximum per student award amount within a sector, the OCOG formula takes a fixed number (average tuition and general charges within a sector), subtracts a fixed number (Pell/EFC combo of \$5,920) and results in a fixed number (maximum per student award amount).

Note, however, that it is the responsibility of each institution to perform a student specific calculation to ensure that each student's Pell grant and EFC combo is being applied toward tuition and general charges before the student's OCOG award amount is determined. The OCOG award chart outlines maximum per student award amounts; however, each student will not automatically receive the maximum award amount due to the interaction(s) between the Pell/EFC combo and tuition and general charges as assessed to each individual student, which is typically the case with institutions such as **Allegheny**Wesleyan, Central State University, God's Bible College, Grace College and Seminary, and Trinity School of Nursing. For ease of administration, a calculator is available on our website for this purpose.

Note the fixed Pell/EFC combo of \$5,920 is arrived at by using the average EFC in any given 100 point range, i.e. an EFC of 50 is assigned to all EFC's between 1 and 100 while an EFC of 1850 is assigned to all EFC's between 1801 and 1900. Students who have higher EFC's receive less Pell. The flattened OCOG formula recognizes that Pell awards have already 'leveled the playing field' and provided each student with an equal amount of 'buying power' (Pell/EFC combo). A flattened OCOG scale maintains this equalization.

*New*Awards at Community Colleges and Regional Campuses

Ohio Administrative Code 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 \$5,920 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.

However, for the 2017-2018 academic year, the average tuition and general charges at university regional campuses slightly exceeds the fixed Pell/EFC combo of \$5,920. Therefore, a modified maximum OCOG award amount will be available to students attending these institutions.

*Update*Influence of Other Tuition-Specific Aid

OCOG is tuition/general fees specific and any student receiving <u>100%</u> 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 tuition/general fees-specific aid <u>not equal to 100%</u> 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 aid that is tuition/general fee-specific minus the Pell/EFC combo equals final OCOG eligibility (up to the respective 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.

*Update*Treatment of Federal Veterans' Education Benefits

Upcoming statute changes allow for a student that is receiving federal veterans' education benefits to use their OCOG award towards their housing and living expenses, in addition to their tuition/general fees. 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, OCOG is not tuition specific and the student may be eligible for the 2017-2018 maximum OCOG amount. For ease of administration, a calculator is available on our website for this purpose. Since this change will not be legally effective until late September or early October of 2017, this change will not be effective until the winter/spring 2018 term.

Foster Youth at Community Colleges

Qualified foster youth at community colleges continue to be eligible for OCOG in academic year 2017-2018. Statute requires that for otherwise OCOG eligible students, 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. A scanned copy of this letter must be sent to our office in order to override the \$0 OCOG eligibility that will normally populate all community college students on the eligibility query.

Assuming the living expenses plus tuition/general fees exceed \$7,456 (\$5,920 plus \$1,536) for the academic year, these community college foster youth could be eligible for the 2017-2018 maximum public OCOG amount of \$1,536. 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, OCOG is not tuition specific. For ease of administration, a calculator is available on our website for this purpose.

*Update*Third-term OCOG 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 OCOG for academic year 2017-2018. Statute states 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. Please reference guidance memo FA 18-001A for specifics to awarding third-term OCOG. Note that with the recent implementation of year-round Pell grants, an institution may find less students that would qualify for third-term OCOG.

*Update*Dual Enrollment at University Regional Campuses

The combined number of credits for students that are enrolled at both the public university main campus <u>and</u> 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. For ease of administration, a calculator is available on our website for this purpose.

A scenario where the student is enrolled at a public university main campus but being fully charged regional campus charges would need to follow the guidelines for regional campus awards. For the 2017-2018 academic year, the average tuition and general charges at university regional campuses slightly exceeds the fixed Pell/EFC combo of \$5,920 and therefore a modified OCOG award amount will be available to students attending these institutions.

*New*Students with Intellectual Disabilities

Upcoming statute changes allow for a student that is enrolled in a degree, certificate, or non-degree program designed to support individuals with intellectual disabilities to be considered for an OCOG award. The student must be receiving academic, career, technical, and independent living instruction at an institution of higher education being prepared for gainful employment and supported by the United States Department of Education. Since this change will not be legally effective until late September or early October of 2017, this change will not be effective until the winter/spring 2018 term. Further guidance on the eligible institutions/programs and award amount will be forthcoming.

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 of 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.

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, 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.

*New*Program Approval

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

*New*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. 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).

*New*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.

*Update*Ohio Residency

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 and therefore would not be considered for the grant.

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/.

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).

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.

*New*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.

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.

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

*New*Duplicate Identifiers

A 063 error message of 'student identifier pending' means there is an internal hold due to conflicting identifying information. Please forward the students name and last four of their ssn to the program manager to determine if further documentation is needed to clear the error.

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.

*Update*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 inquires of multiple students for reasons such as residency overrides. 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.*

Award Chart

2017-2018 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 <u>and</u> a maximum household income of \$96,000:

OCOG 2017-2018				
PUBLIC	Enrollment Status			
	Full-time	3/4 Time	1/2 Time	1/4 Time
Community Colleges*	0	0	0	0
Regional Campuses*	58	44	29	15
All Other Public Main Campuses**	1536	1152	768	384
PRIVATE	Enrollment Status			
	Full-time	3/4 Time	1/2 Time	1/4 Time
Private, Non-Profit**	3072	2304	1536	768
Private, For-Profit**	1140	855	570	285
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).
- *Eligible foster youth at community colleges may qualify for OCOG using main campus maximum award amounts.
- *The fixed Pell/EFC combo of \$5,920 continues to exceed the average tuition and general charges at community colleges and therefore no OCOG awards will be available to students attending these institutions. However, if a student in this sector attends an eligible institution year-round, a main campus term award may be distributed once Pell grants have been exhausted.
- *The average tuition and general charges at university regional campuses slightly exceeds the fixed Pell/EFC combo of \$5,920. Therefore, a modified maximum OCOG award amount will be available to students attending these institutions. However, if a student in this sector attends an eligible institution year-round, a main campus term award may be distributed once Pell grants have been exhausted.
- **The OCOG award chart outlines maximum per student award amounts; however, each student will not automatically receive the maximum award amount due to the interaction(s) between the Pell/EFC combo and tuition and general charges as assessed to each individual student, which is typically the case with institutions such as Allegheny Wesleyan, Central State University, God's Bible College, Grace College and Seminary, and Trinity School of Nursing. It is the responsibility of each institution to perform a student specific calculation to ensure that each student's Pell grant and EFC combo is being applied toward tuition and general charges before the student's OCOG award amount is determined.
- ***Amounts for Ohio residents attending eligible Pennsylvania institutions-- \$600/\$300 figures to non-veterans apply 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.