FINANCIAL AID GUIDANCE MEMO
REFERENCE: FA27-004
TOPIC: CHOOSE OHIO FIRST SCHOLARSHIP (COF)
AUTHOR: EMILY TURNER, DIRECTOR, CHOOSE OHIO FIRST
DATE: June 22, 2026
RELEVANT STATUTE: OHIO REVISED CODE SECTIONS 3333.60 – 3333.69

The Choose Ohio First Program

Ohio Revised Code 3333.61 establishes the Choose Ohio First Scholarship Program. Through a competitive process described in Ohio Revised Code 3333.62, the Chancellor awards scholarships to universities and colleges to recruit Ohio residents as undergraduate and graduate students or as certificate seekers in the fields of science, including health sciences, technology, engineering, mathematics (STEM), and to students earning certificates or degrees to become a teacher in a STEM field.

Choose Ohio First (COF) scholarships are student-centered grants from the state to assist eligible students to attend a university or college. As such, Choose Ohio First scholarships are awarded to each participating institution for scholarships for students attending the institution and must be reflected on the student's tuition bill.

Ohio Administrative and Revised Codes

The relevant sections of the Ohio Revised Code for Choose Ohio First are 3333.60 through 3333.69, 3333.38, and 3345.32. The COF Administrative Code is 3333-1-61.

Grantee Resources

Other resources and guidance documents can be found on the Choose Ohio First Grantee Resources Page: https://highered.ohio.gov/initiatives/affordability/choose-ohio-first/cof-grantee-resources

Standards and Eligibility for Choose Ohio First Scholars

COF scholars must qualify for in-state tuition and be Ohio residents according to the Ohio Student Residency Administrative Rule, OAC 3333-1-10: http://codes.ohio.gov/oac/3333-1-10/.

Students must seek an undergraduate or graduate degree, or a for-credit certificate in an eligible STEM or eligible education program on the COF STEM CIP list. Eligible fields of study are named in the institution's proposal and subsequent Choose Ohio First award agreement and are described by the Classification of Instructional Program (CIP) code. Institutions will be paid only for scholars who are enrolled in CIP codes approved in the institution's current award agreement(s).

To award a COF scholarship to a student, the student must be new to the eligible STEM or eligible teaching program at the institution. Internal and external transfer students may receive COF scholarships. External transfer is the process of transitioning previously earned college credit at one institution of higher education to another. Internal transfer is the process of transitioning a student who is currently enrolled at your institution into a Choose Ohio First-eligible course of instruction (CIP).

Currently enrolled students in a STEM or non-STEM program who decide to transfer/change majors into an eligible STEM or eligible teaching program are new to the program. Transfers should result in increased enrollment within the CIP code.

Students must maintain enrollment in one of the school's eligible COF programs of study and must meet any other eligibility criteria that the school sets.

A Choose Ohio First scholar may change majors and remain eligible for a COF scholarship if the student maintains enrollment in a program with an approved CIP Code in the institution's award agreement.

If a scholar changes out of an approved CIP code major or withdraws from the academic program mid-year, the student will lose the scholarship for future terms.

Scholars can be enrolled in full-time (12 or more credit hours) or part-time (anything less than 12 credit hours) study.

Scholarships are multi-year commitments designed to support students who are completing their degree or certificate.

Former College Credit Plus (CCP) students are eligible for COF funding.

It is encouraged that scholars maintain a cumulative grade point average (GPA) of 3.0 or higher. If a student has a cumulative GPA less than 3.0, the institution is required to report to ODHE a plan for providing academic support to that student. Plans are submitted through the HEI System as follows: If a student has a cumulative GPA between 2.0 and 3.0, the institution shall enter a Student Support Type Code for the student in the CO file. If a student has a cumulative GPA below 2.0, the institution shall submit a narrative description of a student support plan in the CO file.

The institution will inform each student of scholarship requirements and events that may eliminate the availability of the scholarship in future terms or years, including lack of funding from the state and performance by grantee.

Student Scholarship Amounts

For scholars who have received a COF scholarship toward an associate, baccalaureate, or graduate degree, the COF scholarship amount must be at least $1,500 per academic year (summer, fall, and spring terms). **If a student attends only one term, the student must receive the minimum of $1,500.**

For scholars who have received a COF scholarship toward a certificate program, the COF scholarship must be at least $500 per academic year (summer, fall, and spring terms). **If a student attends only one term, the COF scholarship must be a minimum of $500.**

For scholars who have received a COF scholarship, the COF scholarship cannot exceed the maximum per student award of **$9,445** per academic year (summer, fall, and spring terms) from Choose Ohio First funds. This maximum amount is the same for both degree-seeking and certificate-seeking students. This is calculated annually as one-half of the highest in-state undergraduate instructional and general fees charged by all state universities.

Institutions may modify, without an amendment and without notifying ODHE, the individual student scholarship amount as long as the scholarship amount falls within the minimum and maximum award amounts.

Scholarship Use

Beyond tuition and general fees, book vouchers and meal plans are approved as an eligible use of COF funds. The student's tuition bill shall reflect all eligible costs and the use of Choose Ohio First Scholarships funds for those eligible costs. The entire grant must be used for scholarships, and not for administration.

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 uniformly assessed if students can opt out, and therefore would not be considered a general fee. A list of the public institution's general fees reported by institutions to ODHE can be found here: https://highered.ohio.gov/data-reports/key-topic-areas/dr-tuition-financial-aid/data-reports-tuition-financial-aid .

COF funds are not refundable to the student. COF funds applied to eligible expenses cannot exceed the allowable expenses. Students cannot receive an overage or refund of COF funds nor can a refund or overage of COF funds be applied to the student's account.

Students are eligible for COF funding during study abroad terms, co-ops, or internships if they have eligible expenses for that term. The institution must maintain documentation showing eligible expenses and those expenses must be indicated on the student's tuition bill.

Work-Based Learning

The Ohio Revised Code, 3333.64 requires all students receiving a COF scholarship to be involved in work-based learning through a co-op; internship; research experience in a university, college, or private laboratory; or other work-based learning experience at least once during their time as a COF Scholar. Work-based learning experiences are reported by the institution in the HEI System.

Institutional Awards

Institutions should refer to their grant agreements for information about the institutional award. Helpful definitions are:

- Total Institutional Award – the total amount awarded to the institution over the 5-year award period.

- Cohort Amount – the specific amount of money available to fund scholarships for each cohort for one year. Cohort amounts are provided for a cohort's consecutive years of education (i.e. four years of funding for a bachelor's degree). It is required that an institution recruits a new cohort each year of the 5-year award. Thus, the institution will be managing multiple cohort amounts throughout the life of the award.

- Annual Allocation – the sum of the cohort amounts received in any one year of the 5-year grant period.

Modifications to the total institutional award, cohort amount or annual allocation must be made in writing and approved by ODHE, by way of an amendment being fully executed by both parties.

ODHE reserves the right to make modifications to the total institutional award, cohort amount, or annual allocation based on annual evaluations of the performance of the institution. Modifications will be made to better attain the goals and objectives of the project and of the State of Ohio. ODHE shall notify the Institution of any modification to its funding for student COF scholarships.

Higher Education Information (HEI) System

The Higher Education Information (HEI) System is a comprehensive relational database that includes a wide variety of data submitted by Ohio's colleges and universities. Institutions must use the HEI System to report academic program information, student information, and request payments for Choose Ohio First scholarships. Information about the HEI System requirements for the Choose Ohio First program can be found at https://highered.ohio.gov/data-reports/hei-system/hei-file-doc/hei-cof.

The HEI System is operated by ODHE's data team. To gain access to HEI for the Choose Ohio First program, please refer to https://highered.ohio.gov/data-reports/hei-system/hei-resources for information on setting up accounts for new HEI users or modifying the roles for existing users.

Sensitive Personal Identifiable Information

Sensitive personal identifiable information (PII) should always be transmitted to ODHE via the Secure File Exchange Portal in HEI. PII includes a student's name, full social security number, or a combination of other personal information that when used collectively could pose a threat to the student's identity. Files and information can be uploaded to the following site: https://heifx.ohiohighered.org/acprod/odb_dhe/r/dhe/hfe/login_desktop . Log in to the site with your COF system username and password and select "Choose Ohio First" where it says, "Associate with Program", then select "Send File". This will automatically send an email to the COF program contacts notifying them to log in and review the materials.

Payment Submissions and Reimbursements

Institutions request payments each term (summer, fall, and spring) by submitting the required data in the Choose Ohio First payment system in HEI. Payment requests must be made within the prescribed period for each term, called the "payment window". ODHE will distribute funds within 60 days of receipt of a complete and accurate payment request.

Payment Windows are:

- Summer semester window: July 1 to October 1
- Autumn semester window: December 1 to March 1
- Spring semester window: May 1 to September 1

If a grantee needs to request an extension due to extenuating circumstances, a request must be made under the Institution Management tab in HEI before the payment window closes. Any requests received outside of a payment window will not be paid unless an institution receives an extension.

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 after the date the institution received those funds.

Overpayments to Institutions (Refunds to ODHE)

If the institution submitted a payment request to ODHE and payment was received, then subsequently determined to be an overpayment, a correction process must be initiated by the institution to refund the payment to ODHE. Corrections within the same academic year can be made through the HEI System by adjusting a future payment. To do this, the institution must submit a new payment file and select reduction as the payment type. Once the file is received, the refund amount will be deducted from the institution's next payment request. Additional instructions can be found on the CO and CC File sites under the HEI section of ODHE's website.

If it is not possible to correct an overpayment in the same academic year, the institution must complete the correction process as noted above and then refund the overpayment to ODHE via a check within 30 days of submitting the corrected payment file. Please include a memo identifying the refund is for the COF program and use the Secure File Exchange Portal in HEI to communicate the names of students associated with the repayment. Refunds can be made via check **payable to the Ohio Department of Higher Education** and mailed to:

Ohio Department of Higher Education
ATTN: Choose Ohio First - FISCAL
25 South Front Street, 7th Floor
Columbus, Ohio 43215-4176

Please note, 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.

Matching Funds

The institution is required to provide a match in a 1 to 1 ratio for each Choose Ohio First dollar received. Institutional match is accounted for on an annual basis and must be expended in the fiscal year in which the COF funding was provided. All matching funds, institutional and partners', must be supported by appropriate documentation and records.

All reasonable institutional, operational, and capital costs that are directly associated with delivering the project outcomes identified in the institution's Choose Ohio First proposal may, at ODHE's discretion, be counted as an eligible institutional match.

Examples of eligible and ineligible institutional match include but are not limited to:

- Other scholarships or tuition assistance
    - Ineligible: Federal Student Aid and ODHE Aid are not eligible sources of match.

- Salaries & Benefits – key personnel (project director/coordinator, faculty, mentors, and others) as it relates directly to the project outcomes for the approved CIP codes and for the percentage of COF scholars served
    - Note: Salaries and benefits can be counted only one time for each grant. For example, a program leader who spends 100% of their time managing three Choose Ohio First grants and their time is distributed equally between the three grants; Their time will be reported as 33.3% on grant one, 33.3% on grant two and 33.3% on grant three.
- Salaries & Benefits – support personnel (staff from financial aid, accounting, and other areas that support COF but do not have programmatic oversight) as it relates directly to the project outcomes for the approved CIP codes and for the percentage of COF scholars served
    - Note: Salaries and benefits can be counted only one time for each grant. For example, a support person spends 3% of their time supporting three Choose Ohio First grants and their time is distributed equally between the three grants. Their time will be reported as 1% on grant one, 1% on grant two and 1% on grant three.
- Contractual services
- Equipment rental, lease, purchase, or donation
- Supplies and materials
- Employee travel
- COF Scholar travel
- COF Scholar wages during an internship, co-op or research experience
- Matching funds provided by institutional partners (public or private) such as donated time (salaries and benefits)

Program Accountability and Reporting

Choose Ohio First participating colleges and universities are required to:

- Submit appropriate student, academic program, and payment data to HEI according to payment windows.
- Submit an annual report inclusive of fiscal and performance measures using a reporting tool provided by ODHE at the end of the academic year;
- Fulfill pledges of other institutional, public, or nonpublic matching funds;
- Submit a closeout report upon termination or at the end of the grant period using a reporting tool provided by ODHE; and
- Submit annual reports for three years after the completion of the grant.

***UPDATE* 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 to maintain our goal of auditing a set number of institutions yearly. Every institution will be audited *at least* once every three years. Separate guidance can be found here: https://highered.ohio.gov/educators/financial-aid/sgs-guidance-memos.

***UPDATE* Selective Service**

Ohio Revised Code (ORC) 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 institutions verify that students comply with selective service registration before requesting state grant and scholarship funding for the term, submitting to be included in the subsidy calculations (publics only), and charging in-state tuition (publics only)**.

The institution must keep this documentation in the event of an audit. If a student falls into one of the exceptions according to ORC for selective service, the documentation for this exception must also be provided to ODHE in the case of an audit. 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 the Ohio General Assembly chooses to amend this legislation, ODHE will inform the campuses.

Please direct questions to Emily Turner, Director, Choose Ohio First, (614) 728-3090 or eturner@highered.ohio.gov.