



8/5/2024

Mike Heller, Vice President for Finance & Administration  
Mercyhurst University

Erie, PA 16546  
mheller@mercyhurst.edu

Dear Mike:

On October 30, 2015, the Department of Education published final regulations amending its cash management regulations (34 CFR 688.167) which covers regulated institutions of higher education with qualifying agreements with a service provider to maintain a relationship with the provider under 34 CFR 688.167(a)(2)(i)(A).

The rules require, among other things, that an institution of higher education publicly post information on its website related to:

1. The total consideration paid or received by the parties under the contract between the institution and the financial account provider;
2. For any year in which the institution's enrolled students open 30 or more financial accounts under the agreement,
  - a. \_\_\_\_\_ the most recently completed award year (July 1 – June 30) and
  - b. \_\_\_\_\_ the mean and median costs incurred by those student account holders.

On September 7, 2016, the DOE issued Dear Colleague letter GEN 16-16, entitled "Institutional Reporting of Fee Information Under the New Cash Management Regulations" (the "Letter"). A copy of the Letter can be found here [-section/library/dear-colleague-letters/2016-09-07/institutional-reporting-fee-information-under-new-cash-management-regulations](#). (b) (5) - DPP, EOP;

requiring institutions to publicly disclose information about the costs incurred by students who elect to use a financial service offered under the "Fee Cap or Fee-Tier" agreement. The DOE provides the following table (a) regarding the specific information necessary for use for calculating the requested cost disclosure information.

1. Matching Directory Information
- 2.
3. Revenue Sharing

In addition, the DOE indicates that "new electronic agreements already in use or in development means by which the data required can be gathered." This would be the case for PNC Bank. However, since our available account coding would be a fourth (4<sup>th</sup>) method allowed by the DOE... In any event, the DOE expects institutions

“to use the method that is  
cost information was calculated in a reasonable and reliable manner.”

its institutions

In the Letter, the DOE further permits institutions which must deal with the inability to eliminate non-students from the data “to include in the cost disclosures any student who held an account within the last two years. For example, the students identified by the institution as having an account under any of these approaches would be in a two-

~~year cohort calculation to be used to address any method~~

rein the elimination of non-students from the calculation is not

administratively possible.

~~The reference is made to the data to be used to calculate the BNC provided information on the number of student account holders under the 4th method from a two-year cohort of customers whose student accounts were opened between July 1, 2022 and June 30, 2024. This information is provided for the sole purpose of reporting under the cash management regulation, and may not be revised, not disseminated or employed for any other purpose.~~

~~has provided the information needed on a separate attachment~~

~~**BNC Bank will permit posting the separately attached information to your website in a form and substance identical to the presentation of the information attached separately. If you have any questions or comments, if it may relate to the content provided in this letter, please reach out to me directly or through my U of U University**~~

Sincerely,

Nichole Hagan  
Senior Vice President, University Banking Sales Manager  
The Tower at PNC Plaza  
300 Fifth Avenue, 23<sup>rd</sup> Floor  
Pittsburgh, PA 15222