PNC BANK

August 18, 2026

William E. Davies, Vice President for Business and Finance
Mt. St. Mary's University
16300 Old Emmitsburg Road
Emmitsburg, MD 21727

Dear William:

On October 30, 2015, the Department of Education published final regulations amending its cash management rules (see, 34 CFR 668.161 – 668.167) which covers regulated institutions of higher education with qualifying arrangements with banks. In an effort to assist your institution in complying with the provisions under 34 CFR 668.164(e)(2)(vii), (e)(2)(vii), (e)(3), (f)(4)(iv), (f)(4)(v), and (f)(5), please refer to the information below.

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 number of students who had financial accounts under the contract at any time during the most recently completed award year (July 1 – June 30), and
    b. The mean and median costs incurred by those student accountholders

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 https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2016-09-07/institutional-reporting-fee-information-under-new-cash-management-regulations. In the Letter, the DOE presents "guidance to institutions and financial account providers about complying with new provisions requiring institutions to publicly disclose information about the costs incurred by students who elect to use a financial account offered under a Tier One or Tier Two arrangement." The DOE provides the following three (3) specific methods institutions may choose to use for calculating the requested cost disclosure information shown above in #2:

1. Matching Directory Information
2. Accounts linked to Student IDs
3. Revenue Sharing

In addition, the DOE acknowledges that "many existing agreements already provide a convenient means by which the data required can be gathered." This would be the case for PNC Bank. Hence, using our available account coding would be a fourth (4th) method allowed by the DOE. In any event, the DOE expects institutions "to use the method that is most accurate in light of the information they have," and be able to evidence "that the cost information was calculated in a reasonable and reliable manner."

The fourth method, described in the Letter, though not specifically enumerated, expressly permits institutions to use a method already available from their bank. We believe that the account coding process long employed by PNC Bank qualifies as an acceptable method.

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 and the institution would disclose the number of students in that cohort and mean and median costs incurred by those students." This two-year cohort calculation can be used to address any method the institution may choose to use wherein the elimination of non-students from the calculation is not administratively possible.

Therefore, in accordance with the Letter and other applicable law, PNC provides fee information and the number of student accountholders under the 4th method from a two-year cohort of customers whose student accounts were opened between July 1, 2024 and June 30, 2026. This information is provided for the sole purpose of reporting under the cash management regulation, and may not be revised, nor disseminated or employed for any other purpose.

In order to assist you in complying with the cash management regulations, PNC Bank has provided the information needed on a separate attachment.

PNC 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 concerns as it may relate to the content provided in this letter, please reach out to me directly or through your University Banking Representative.

Sincerely,

Nichole L. Hagan

Nichole Hagan
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1. Total consideration paid in the period July 1, 2025, through June 30, 2026: Contract payment of $5,000
2. Total number of customers holding student financial accounts which originated under the contract from July 1, 2024 to June 30, 2026: 174
3. Mean student costs in the year ended June 30, 2026: $13.94
4. Median student costs in the year ended June 30, 2026: $0.00