

Federal Cash Management Rules

Under the Federal Title IV cash management regulations, institutions are required to publicly disclose any contract with a financial account provider that provides Title IV credit balances to students, known as a Tier One (T1) or Tier Two (T2) Arrangement. Tier One (T1) arrangements are those between an institution and a third-party servicer where the servicer “performs one or more of the functions associated with processing direct payments of Title IV funds on behalf of the institution” and offers one or more financial accounts under the arrangement, or markets an account to students itself or through another entity. Tier Two (T2) arrangements are defined as those between an institution and a bank under which accounts are offered and marketed directly to students.

Stratford University is currently in a Tier One (T1) arrangement. All disclosures related to these new regulations and banking services contract will be made on this web page.

Third Party Services Agreements

Expiration	Vendor Name	Contract	Description
Ongoing	Educational Computer Systems, Inc.	Contract # 1	RefundSelect

On October 30, 2015, the U.S. Department of Education (Department) published Final Regulations in the Federal Register amending the Cash Management regulations at 34 CFR 668.161 – 668.167. Under §668.164(e)(2)(vii) and §668.164(f)(4)(iv), by September 1, 2017, any institution with a Tier One (T1) arrangement, and/or a Tier Two (T2) arrangement that meets or exceeds the credit balance thresholds under §668.164(f)(2)(ii) must post on its website T1 and/or T2 contract data pertaining to the total consideration paid or received by the contracting parties under the arrangement for the most recently completed award year. No later than September 1, 2017, each such institution must also post the mean and median costs its students incurred, as well as the number of students who had financial accounts under the contract at any time during the most recently completed award year, unless the institution had fewer than 30 enrolled students with accounts opened under the T1 or T2 arrangement. The regulations require that thereafter, these postings must be updated within 60 days after the end of each award year.

Section 668.164(e)(2)(vii) and (f)(4)(iv) also states that the institution must post this contract information in “a format established by the Secretary.” To meet this requirement, institutions must do the following:

- Post information regarding the mean and median costs students incurred and the number of student accountholders prominently, and as the first piece of information at the URL provided to the Department under §668.164(e)(2)(viii) and (f)(4)(v).

Total Accounts:	Less than 30
Avg. Fee Amount:	n/a
Median Fee Amount:	n/a

- Place information regarding the total monetary consideration paid or received by the contracting parties directly below the information regarding student accounts.

Academic Year:	2017-2018
Total Monetary Paid:	\$4861.

- Place any non-monetary consideration between the contracting parties directly below information pertaining to the monetary consideration.

Academic Year:	2017-2018
Total Non-monetary:	None

The [Cash Management Information Page](#) on the IFAP website contains information on the Cash Management regulations, including Frequently Asked Questions (FAQs).