

2020 - 2021 ACH Rules Updates for Originating Companies

SAME-DAY ACH DOLLAR LIMIT INCREASE

Effective March 20, 2020

The Same-Day ACH Dollar Limit Increase rule increases the per-transaction dollar limit from \$25,000 to \$100,000. Both Same-Day ACH credits and Same-Day ACH debits are eligible for same-day processing up to \$100,000 per transaction.

DIFFERENTIATING UNAUTHORIZED RETURN REASONS

Effective April 1, 2020

Return Reason Code R11 was re-purposed to be used for the return of an authorized debit in which there is an error or defect in the payment such that the entry does not conform to the terms of the authorization. The re-purposed description is “Customer Advises Entry Not in Accordance with the Terms of the Authorization.” A Written Statement of Unauthorized Debit is required for all R11 returns.

NEW SAME-DAY ACH PROCESSING WINDOW

Effective March 19, 2021

The New Same-Day ACH Processing Window rule will create a new processing window that will enable Originating Depository Financial Institutions (ODFI) and their customers to originate same-day ACH transactions for an additional two hours each banking day.

RDFIs will need to make funds available for credits processed in the new window by the end of their processing for that settlement date.

SUPPLEMENTING FRAUD DETECTION STANDARDS FOR WEB DEBITS

Effective March 19, 2021

The current screening requirement will be enhanced to make it explicit that “account validation” is part of a “commercially reasonable” fraudulent transaction detection system. The supplemental requirement will apply to the first use of an account number, or changes to the account number. For existing WEB debit authorizations, the rule will be effective on a go-forward basis. Originators will have to perform account validations as updates are made to account numbers in existing authorizations.

SUPPLEMENTING DATA SECURITY REQUIREMENTS

Phase 1 - Effective June 30, 2021; Phase 2 - Effective June 30, 2022

Return Rule expands the existing ACH Security Framework to explicitly require large, non-financial institution Originators, Third-Party Services Providers, and Third-Party Senders to protect account numbers used in the initiation of ACH entries by rendering them unreadable when stored electronically. The rule applies only to account numbers collected for or used in ACH transactions and does not apply to the storage of paper authorizations.

- Phase 1: Any Originator, Third-Party Service Provider, or Third-Party Sender that originated six (6) million or more ACH transactions in calendar year 2019 must be compliant by June 30, 2021.
- Phase 2: Any Originator, Third-Party Service Provider, or Third-Party Sender that originated two (2) million or more ACH transactions in calendar year 2020 will need to be compliant by June 30, 2022.

NACHA RULES

Full copies of the National Automated Clearing House Association (NACHA) ACH Rules may be ordered at www.nacha.org.

An electronic version of the ACH Rules may be viewed online by registering at www.achrulesonline.org.