



2022-2023 Nacha Rules Changes for ACH

This 2022-2023 NACHA Rules notification provides a summary of changes to the NACHA Operating Rules & Guidelines (“Nacha Rules”), listed chronologically in the order of effective date. For further information we recommend that you obtain a copy of the NACHA Operating Rules and Guidelines. The Nacha Rules are published annually and may be referenced or ordered at www.nacha.org/store. More detailed information regarding these changes may also be found at www.nacha.org/rules/operating-rules.

Same Day ACH Dollar Limit Increase - Effective March 18, 2022

This rule will increase the Same Day ACH dollar limit to \$1 million per payment for all Same Day ACH entries; consumer and business payments, credits and debits.

Supplementing Data Security Requirements (Phase II) - Effective June 30, 2022

This change impacts Originators and Third Party Service Providers (including Third Party Senders). The existing ACH Security Framework, including its data protection requirements, will be supplemented to explicitly require large, non-Financial Institution Originators, Third-Party Service Providers (TPSPs) and Third-Party Senders (TPSs) to protect deposit account information by rendering it unreadable when it is stored electronically.

Implementation begins with the largest Originators and TPSPs (including TPSs) and initially applied to those with ACH volume of 6 million transactions or greater annually. Phase II applies to those with ACH volume of 2 million transactions or greater annually.

- Phase 1 – June 30, 2021 for Originators and Third-Parties with ACH volume greater than 6 million in 2019
- Phase 2 – June 30, 2022 for Originators and Third-Parties with ACH volume greater than 2 million in 2020

Micro-Entries

This Rule will define and standardize practices and formatting of Micro-Entries, which are used by some ACH Originators as a method of account validation. The Rule is to become effective in two phases:

- Phase 1 - September 16, 2022: The term Micro-Entry will be defined, and the Originator will be required to use “ACCTVERIFY” in the Company Entry Description field and establish Micro-Entry origination practices
- Phase 2 – March 17, 2023: Originators of Micro-Entry will be required to use commercially reasonable fraud detection, including the monitoring of Micro-Entry forward and return volumes

Third-Party Sender Roles and Responsibilities – Effective September 30, 2022

Nested Third-Party Senders

- Defines a Nested Third-Party Sender
- Updates the requirements of Origination Agreements for a Nested TPS relationship
- Establishes the “chain of agreements” and responsibilities in a Nested TPS arrangement
- Updates existing TPS registration to denote whether a TPS has Nested TPS relationships

Third-Party Senders and Risk Assessments

- Makes explicit that a Third-Party Sender, whether Nested or not, must complete a Risk Assessment of its ACH activities
- Clarifies that a Third-Party Sender cannot rely on a Rules Compliance Audit or a Risk Assessment completed by another TPS in a chain; it must conduct its own

