

As an originator of ACH transactions, you are obligated to comply with all Nacha (National Automated Clearing House Association) Rules.

The following list summarizes select Nacha Operating Rule changes made in 2022 through 2024. For a complete list and description of amendments and Rule changes, visit [www.NACHA.org](http://www.NACHA.org).

## 2022 Nacha Rule Changes

### March 18, 2022

#### ***Increasing Same Day ACH Dollar Limit***

This rule will continue to expand the capabilities of Same Day ACH. Increasing the Same Day ACH dollar limit to \$1 million per transaction is expected to improve Same Day ACH use cases and contribute to additional adoption. This rule will apply to all Same Day ACH entries: consumer and business payments, credits, and debits

### June 30, 2022

#### ***Supplementing Data Security Requirements for Large Originators, Third Party Service Providers and Third-Party Senders – Phase 2***

To the existing NACHA Rule Section 1.6 (Security Requirements), this Rule adds a sentence stating that each Non-Consumer Originator that is not a Participating Depository Financial Institution, each Third-Party Service Provider and Third-Party Sender, whose ACH Origination or Transmission volume exceeds 2 million transactions annually must, by June 30 of the following year, protect Depository Financial Institution Account Numbers used in the initiation of transactions by rendering them unreadable when stored electronically.

- Compliance is required by June 30, 2022, for Originators, TPSPs, and TPSs with ACH transmission volume greater than 2 million entries in the 2020 calendar year.
- The rule states “Going forward after calendar year 2021, any Originator, Third-Party Service Provider, or Third-Party Sender that originates 2 million or more ACH Transactions in any calendar year will need to be compliant with the rule by June 30 of the following calendar year.”

### September 16, 2022

#### ***Micro-Entries – Phase 1***

The Micro-Entry Rule defines and standardizes practice and formatting of Micro-Entries, which are used by some ACH Originators as a method of account validation. This Rule:

- Defines “Micro-Entries” as ACH credits of less than \$1, and any offsetting ACH debits, used for the purpose of verifying a Receiver’s account
- Standardizes the Entry description and Company Name requirements for Micro-Entries
- Establishes other Micro-Entry origination practices
- Applies risk management requirements to the origination of Micro-Entries

### September 30, 2022

#### ***Third-Party Sender Roles and Responsibilities***

The purpose of these rules is to further clarify the roles and responsibilities of Third-Party Senders (TPS) in the ACH Network by addressing the existing practice of Nested Third-Party Sender relationships and making the requirement that a TPS conduct a Risk Assessment.

This rule will define a Nested Third-Party Sender and will provide for the “chain of agreements” and responsibilities in Nested TPS arrangements. A “Nested Third-Party Sender” will be defined as a Third-Party Sender that has an agreement with another Third-Party Sender to act on behalf of an Originator and does not have a direct agreement with the ODFI. Nested TPSs will be addressed in ACH Origination Agreements.

## 2023 Nacha Rule Changes

**March 17, 2023**

### ***Micro-Entries – Phase 2***

The Rule applies risk management requirements to Originators. An Originator of Micro-Entries must conduct commercially reasonable fraud detection on its use of Micro-Entries, including the monitoring of forward and return volumes of Micro-Entries.

- Requires an organization using Micro-Entries to use reasonable methods to recognize and prevent suspicious activity

**Note**, this is different from the WEB Debit account validation requirement

- Monitoring forward and return volumes, at a minimum, establishes a baseline of normal activity
- Velocity monitoring
- An Originator is not required to perform an entry-by-entry review

## 2024 Nacha Rule Changes

**June 21, 2024**

### **Minor ACH Rule Changes**

#### **General Rule for WEB Entries (Article Two, Subsection 2.5.17.1)**

Clarifies the WEB general rule and definition to make it clearer that the Standard Entry Class (SEC) code WEB must be used for all consumer-to-consumer credits, regardless of how the consumer communicates the payment instructions to the Originating Depository Financial Institution (ODFI) or P2P service provider.

#### **Definition of Originator (Article 8, Section 8.71)**

Clarifies the definition of Originator to include its authority to credit or debit the Receiver’s account at the Receiving Depository Financial Institution (RDFI) and clarifies instances when authorization is not required.

#### **Originator Action on Notification of Change (Article Two, Section 2.12.1)**

Allows Originators, at their discretion, to make NOC changes for any single-entry (one-time payment), regardless of SEC code.

#### **Data Security Requirements (Article One, Section 1.6)**

Clarifies the applicability of the data security requirement to protect data stored electronically for those entities meeting the threshold for the first time.

#### **General Rule for Prenotification (Prenote) Entries (Article Two, Subsection 2.6.1) & Definition of Prenotification Entry (Article Eight, Section 8.81)**

Aligns the Rules with industry practices by removing language that limits prenote use to only prior to the first credit or debit entry.

#### **Clarification of Terminology – Subsequent Entries (Article Two, Subsection 2.4.2, Article Two, Subsection 2.6.2, Article Two, Subsection 2.12.1)**

Replaces references to “subsequent entries” in prenote and NOC sections of the Rules with synonymous terms to avoid any confusion with the now-defined term associated with standing authorizations.

A complete list and description of the amendments and Rule changes outlined above are available at [www.nacha.org](http://www.nacha.org).