

Revisions to the Nacha Operating Rules

The 2022 edition of the Nacha Operating Rules & Guidelines contains changes related to the following amendment:

- Increasing the Same Day ACH Dollar Limit to \$1 Million (effective March 18, 2022)

This Revisions section provides a summary of the key components and technical changes to Rules language of this change.

This section also includes a technical summary of the changes to the Rules that were implemented in 2021. The text changes were officially communicated via Supplements, but they are summarized here for reference. Please note that since these changes are already effective, they are not marked within the text of the Rules.

Increasing the Same Day ACH Dollar Limit to \$1 Million

Summary

The Increasing the Same Day ACH Dollar Limit to \$1 Million rule will increase the per-transaction dollar limit from \$100,000 to \$1,000,000. At implementation, both Same Day ACH credits and Same Day ACH debits will be eligible for same day processing up to \$1,000,000 per transaction.

The first Same Day ACH rule incorporated a \$25,000 per transaction limit as a risk mitigation measure, which gave the industry time to gain experience with same day processing while transacting at relatively low dollar amounts. In March 2020, the Same Day ACH transaction limit was increased to \$100,000. With the \$1,000,000 limit, the percentage of ACH dollars eligible for Same Day ACH will more than double. Furthermore, an additional 3.5% of business-to-business payments will become eligible for Same Day ACH. The increase will also make large dollar business-to-consumer transactions and reversals Same Day ACH eligible.

Impact To Participants

Originators and Third-Party Senders: These ACH participants should discuss with their financial institutions whether and when originating debit and/or credit entries up to \$1,000,000 is appropriate for their businesses. If these participants choose to transmit such entries, they need to be prepared for higher dollar transactions flowing through their accounts multiple times during the business day.

ODFIs: ODFIs will need to determine whether and how they will implement higher limit same day transactions with their Originator and Third-Party Sender customers. Higher Same Day ACH dollar limits might impact a financial institution's assessment of its customers' credit risks. ODFIs that offer Same Day ACH will need to update internal processing applications and procedures to accommodate higher dollar limit same-day entries.

RDFIs: RDFIs may need to update their internal processing applications and procedures to accommodate higher limit same-day entries. RDFIs should be prepared for a larger amount of dollars settling at several times throughout the day.

Receivers: Receivers, particularly non-Consumer Receivers, should be prepared to receive ACH debits and credits up to the new \$1,000,000 limit. These participants need to be ready for possibility of higher dollar transactions posting to their accounts throughout the business day. Receivers should review their internal procedures to determine whether any changes are required.

Effective Date

The Rule will be effective on March 18, 2022.