



Electronic Payments Core of Knowledge

PARTICIPANT GUIDE

Don't Stop Complyin': *ACH Rules Update*

Welcome to:

Don't Stop Complyin': ACH Rules Update

Program Description

Ensure your organization is current on new *ACH Rules* amendments. We'll review the rules implemented this year and look at future *ACH Rules* updates for 2026. These new rules aim to mitigate credit-push fraud by strengthening ACH Origination controls and improving the recovery of funds. Learn what you need to know to prioritize your organization's action plan and ensure compliance with these amendments.

AAP/APRP Credits: 1.2

Objectives

- Nacha's Risk Management Strategies
- Exception Handling
- Standard Descriptions
- Fraud Monitoring

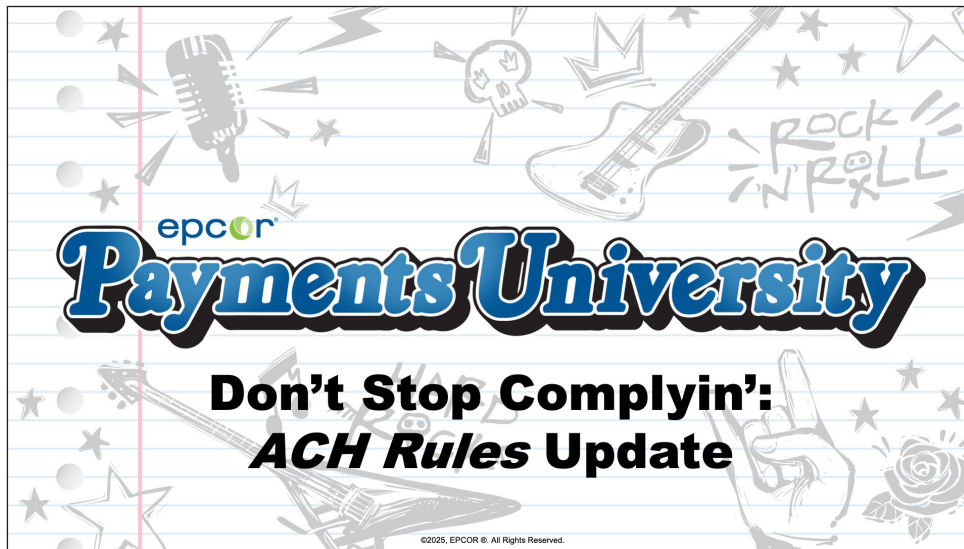
Ground Rules

Please keep the following ground rules in mind to help create a more effective learning experience for everyone. We will discuss additional participation instructions during the online session.

1. Log on to class at least 10 minutes before the scheduled start.
2. Turn off email and phones and clear other distractions away from your training area.
3. Participate and prepare to be called on by name. The online learning environment lends itself to interaction. Participation will keep you engaged and move the class along.
4. Raise your hand if you have an immediate question or comment. Asking questions helps other participants clarify or reinforce concepts.
5. Be patient in waiting for a response to your chat message.

Technical Assistance

Your course invitation email contains step-by-step instructions for logging into this event. If you are having technical difficulty, please call 800.500.0100



Don't Stop Complyin': ACH Rules Update	
Agenda	
1	Nacha's Risk Management Strategies
2	Exception Handling
3	Standard Descriptions
4	Fraud Monitoring

©2025, EPCOR ®. All Rights Reserved.

Nacha's Risk Management Strategies

epcor®
Payments University

©2025, EPCOR ®. All Rights Reserved.

The graphic features a blue rounded rectangle containing the title 'Nacha's Risk Management Strategies' in bold black text. Below the title is the 'epcor Payments University' logo. The background is a light blue lined paper with a red margin line on the left. At the bottom, there are decorative elements including a paperclip, a hand holding a pen, musical notes, and the text 'ROCK N ROLL' with a star.

2010: Risk Management Strategy

ACH RULES
A Complete Guide To Rules & Regulations Governing the ACH Network
epcor®
Simplify what the ACH Means!
ACH Compliance

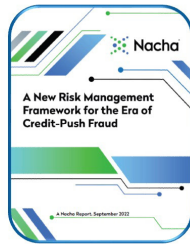
Protect participants from fraud due to unauthorized debits

epcor®
Payments University

©2025, EPCOR ®. All Rights Reserved.

The graphic features the title '2010: Risk Management Strategy' at the top. Below it is a red book cover titled 'ACH RULES' with the subtitle 'A Complete Guide To Rules & Regulations Governing the ACH Network'. To the right of the book is a blue rounded rectangle containing the text 'Protect participants from fraud due to unauthorized debits'. The bottom of the graphic includes the 'epcor Payments University' logo and decorative elements like musical notes, a hand holding a pen, and the text 'ROCK N ROLL' with a star.

2022: Risk Management Strategy



Protect participants from fraud
scams resulting in money sent
out of accounts



Credit-Push Fraud Scams



Account Takeover

Vendor Impersonation

Business Email
Compromise (BEC)

Payroll Impersonation

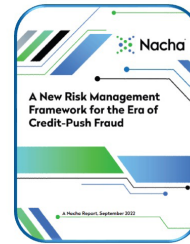


Risk Management Framework Objectives

Increase awareness of credit-push fraud schemes

Strengthen controls surrounding ACH origination

Improve recovery of funds after fraud has occurred



ACH Rules Changes



Timing of Written Statement

Expand Use of R06

Prompt Return of Unauthorized Debits

Standard Company Entry Description

Expand Use of R17

Origination Fraud Monitoring

Exemption From Funds Availability

RDFI Credit Transaction Monitoring



Exception Handling

epcor®
Payments University

Rock n Roll

©2025, EPCOR ®. All Rights Reserved.

Timing of Written Statement

WRITTEN STATEMENT OF UNAUTHORIZED DEBIT

PREVIOUS REQUIREMENT

Written Statement of Unauthorized Debit (WSUD) must be signed & dated on or after the Settlement Date of the entry to which it relates

EFFECTIVE OCTOBER 1, 2024

WSUD must be signed & dated on after the date the entry is presented to the Receiver's account

epcor®
Payments University

Rock n Roll

©2025, EPCOR ®. All Rights Reserved.

Prompt Return of Unauthorized Debits



PREVIOUS REQUIREMENT

Available by opening of business on the banking day following the 60th calendar day following the Settlement Date of the original entry

EFFECTIVE OCTOBER 1, 2024

Available by opening of business on the 6th banking day following RDFI's review of WSUD but in no case later than the opening of business on the banking day following the 60th calendar day following the Settlement Date of the original entry



TAKE ACTION!

Update policies & procedures related to processing extended returns

Improve procedures to ensure extended returns are transmitted timely

Educate frontline/call center & operations staff

RDFI



Expand Use of R17



PREVIOUS REQUIREMENT

Allow use of R17 by RDFI when there is an **account issue** & RDFI finds entry to be **suspicious, questionable or anomalous**

EFFECTIVE OCTOBER 1, 2024

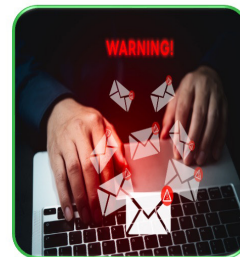
Allow use of R17 by RDFI to return an entry it believes was **initiated under false pretenses**



False Pretenses

Inducement of a payment by a person misrepresenting:

- That person's identity,
- That person's association with or authority to act on behalf of another person, **OR**
- The ownership of an account to be credited



False Pretense Examples

Business Email Compromise (BEC)

Vendor Impersonation

Payroll Impersonation

Other Payee Impersonations

Account Takeover



Exemption From Funds Availability



PREVIOUS REQUIREMENT

RDFI may delay funds availability until the next business day when it suspects a credit is unauthorized (e.g., due to an account takeover)

EFFECTIVE OCTOBER 1, 2024

RDFI may delay funds availability until the next business day when it suspects a credit is unlawful, unauthorized or authorized under false pretenses



Secure Exchange

NEW module of Nacha's Risk Management Portal

RDFI Notification of Exemption from Funds Availability Requirement

Electronic method of contacting ODFI

Sends to both ACH & Fraud/Risk Management contact in ACH Contact Registry



TAKE ACTION!

May implement processes & procedures to identify fraud

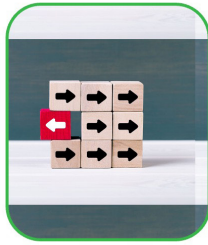
Educate operations staff on use of R17 for fraudulent transactions

May require policy & procedure changes to include delaying funds availability

RDFI



Expand Use of R06



PREVIOUS REQUIREMENT

ODFI may request an RDFI return an **erroneous entry or credit** that was originated **without** the Originator's **authorization**

EFFECTIVE
OCTOBER 1, 2024

ODFI may request an RDFI return an **entry for any reason**



RDFI Response to R06 Request



PREVIOUS REQUIREMENT

RDFI is not obligated to comply with the ODFI's request

EFFECTIVE
APRIL 1, 2025

RDFI is not obligated to comply with the ODFI's request but must **respond** to the ODFI within **10 banking days** of receiving the request



TAKE ACTION!

ODFI

Educate Originators & ODFI staff on use of R06

May require procedural changes to include use of R06 to recover funds



TAKE ACTION!

RDFI

Update procedures to provide response to ODFI related to R06 request

Use Secure Exchange module of Nacha's Risk Management Portal – RDFI Notification of Status of Return Request





Standard Descriptions

epcor®
Payments University

©2025, EPCOR ®. All Rights Reserved.

Rock N' Roll



Standard Company Entry Description



CURRENT REQUIREMENT

Require Originators to use standard Company Entry Description in **specific situations** (e.g., REVERSAL, ACCTVERIFY, RETRY PYMT)

EFFECTIVE MARCH 20, 2026

Require Originators to use:

- **PAYROLL** for PPD credits related to wages
- **PURCHASE** for debits related to e-commerce purchases

epcor®
Payments University

©2025, EPCOR ®. All Rights Reserved.

Rock N' Roll

TAKE ACTION!

Educate Originators, Third-Party Senders (TPSs)
& ODFI staff

Update systems & procedures (Originators & TPSs too!)

ODFI



Fraud Monitoring



Origination Fraud Monitoring



CURRENT REQUIREMENT

Non-Consumer Originators to use a **commercially reasonable fraudulent transaction detection system** to screen **WEB debit entries** & when using **micro-entries**

NEW REQUIREMENT

Non-Consumer Originators, ODFIs, Third-Party Service Providers (TPSPs) & Third-Party Senders (TPSs) to use **risk-based processes & procedures** to identify any ACH entries initiated due to **fraud**



Risk-Based Monitoring Examples

Multifactor authentication

Origination calendar

IP restrictions

Dual controls

New Receiver alerts

Review volume & SEC codes

Confirmation of file totals

Fraud detection software/tools



Phased Implementation Dates



EFFECTIVE MARCH 20, 2026

EFFECTIVE JUNE 19, 2026

- ALL ODFIs
- Non-Consumer Originators, TPSPs & TPSs who initiated 6M+ transactions in 2023

- ALL Non-Consumer Originators
- ALL TPSPs
- ALL TPSs



TAKE ACTION!

Educate Originators & TPSs on new requirement

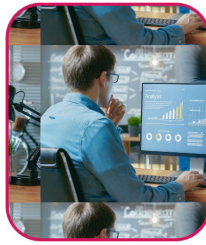
Implement, or update, risk-based processes and procedures to identify fraud

Annually review risk-based fraud detection processes and procedures

ODFI



RDFI Credit Transaction Monitoring



CURRENT REQUIREMENT

No requirement for RDFI to monitor for fraudulent entries

NEW REQUIREMENT

RDFI to use **risk-based processes & procedures** to identify ACH credit entries initiated due to fraud



Risk-Based Monitoring Examples

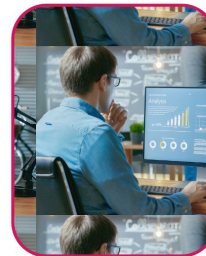
Review transactions over dollar threshold

Look for behavioral patterns

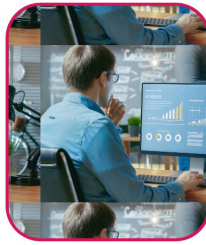
Name matching

Compare account type and SEC code

Review volume & SEC codes



Phased Implementation Dates



EFFECTIVE MARCH 20, 2026

EFFECTIVE JUNE 19, 2026

RDFIs who received 10M+ transactions in 2023

ALL RDFIs



TAKE ACTION!

Implement, or update, risk-based processes & procedures to identify fraud

Enable information sharing internally among departments

Annually review risk-based processes & procedures to identify fraud







RDFI




Thank you!

EPCOR Member Support:
www.epcor.org • memserve@epcor.org
800.500.0100

EPCOR Knowledge Community:
community.epcor.org

epcor
Payments University 

©2025, EPCOR ®. All Rights Reserved.

Thank You for Attending!

EPCOR is your best resource for:

Expertise—

Payments professionals are just a phone call away to help you resolve issues and understand the complex rules and regulations regarding all types of electronic payments.

Diverse Programs—

More than just the *ACH Rules*, you get a variety of programs on fraud, risk, audits and more to protect your organization against loss and penalty.

Keeping Pace with the Evolving Payment Landscape—

You have a voice in industry issues through EPCOR and you stay connected with industry initiatives that influence policy.

Visit epcor.org for a complete list of classroom and online learning events.

CERTIFICATE OF COMPLETION

This certificate is awarded to:

on

In completion of:
**Don't Stop Complyin':
ACH Rules Update**

This course is worth 1.2 AAP/APRP
continuing education credits.



A handwritten signature in black ink, appearing to read "James Carrick".

James Carrick
Vice President, Education, EPCOR

