

Revisions to the Nacha Operating Rules

The 2026 edition of the Nacha Operating Rules & Guidelines contains changes related to the following amendments:

- Fraud Monitoring by Originators, Third-Party Service Providers/Third-Party Senders and ODFIs (Effective in 2 Phases, March 20, 2026 and June 19, 2026)
- RDFI ACH credit monitoring (Effective in 2 Phases, March 20, 2026 and June 19, 2026)
- Standard Company Entry Descriptions – Payroll and Purchase (Effective March 20, 2026)

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

This Revisions section also includes a technical summary of changes to the Rules that were implemented in 2025, as well as a summary of editorial notes and corrections made to the 2026 edition of the Rules. Please note that these changes are not marked within the text of the Rules.

Fraud Monitoring by Originators, Third-Party Service Providers/ Third-Party Senders and ODFIs

SUMMARY

The Fraud Monitoring by Originators, Third-Party Service Providers/Third-Party Senders and ODFIs Rule (the Rule) will require each non-consumer Originator, ODFI, Third-Party Service Provider, and Third-Party Sender to establish and implement risk-based processes and procedures reasonably intended to identify ACH entries initiated due to fraud. Each of these parties will need to review at least annually their processes and procedures and make any appropriate updates to address evolving risks. The objective of the Rule is to reduce the incidence of successful fraud attempts through regular fraud detection monitoring.

IMPACT TO PARTICIPANTS

Originators, Third-Party Service Providers, and Third-Party Senders: These entities may need to implement fraud detection processes and procedures if they are not doing so currently. There may be less of an impact for those that have already implemented commercially reasonable fraud detection for WEB debits and/or for Micro-Entries.

ODFIs: ODFIs may need to update their fraud detection processes and procedures to include credit entries, if these entries are not currently part of their review process.

EFFECTIVE DATES

The Rule will be implemented in two phases:

Phase 1 – March 20, 2026. – On this date, the Rule will apply to all ODFIs and those non-consumer Originators, Third-Party Service Providers, and Third-Party Senders with an annual ACH origination volume that exceeds 6 million entries in 2023.

Phase 2 – June 19, 2026 – The Rule will apply all other non-consumer Originators, Third-Party Service Providers, Third-Party Senders on this date.

TECHNICAL SUMMARY

Below is a summary of the impact of The Fraud Monitoring by Originators, Third-Party Service Providers/Third-Party Senders and ODFIs Rule on the Nacha Operating Rules. The Rules contain the impacted rule language as it will read upon implementation in highlighted, italicized text.

- *Article Two, Subsection 2.2.4 (Identification of Unauthorized Entries or Entries Authorized Under False Pretenses)*
– New subsection to establish rules surrounding fraud monitoring.

RDFI ACH Credit Monitoring

SUMMARY

The RDFI ACH Credit Monitoring Rule (the Rule) mirrors the Fraud Monitoring by Originators, Third-Party Service Providers/Third-Party Senders and ODFIs Rule in that it will require RDFIs to establish and implement risk-based processes and procedures reasonably intended to identify credit ACH entries initiated due to fraud. As with the other entities, RDFIs will need to review at least annually their processes and procedures and make any appropriate updates to address evolving risks. The objective of the Rule is to reduce the incidence of successful fraud and better enable the recovery of funds when fraud has occurred.

IMPACT TO PARTICIPANTS

RDFIs: RDFIs that have not done so will need to establish processes and procedures reasonably intended to identify credit entries that are suspected of being unauthorized or authorized under False Pretenses. For those RDFIs that already have such processes and procedures in place, they will need to ensure that their existing processes and procedures are satisfactory under the Rule, including updating such systems and their alert processes, if necessary. RDFIs may need to enable information sharing internally between teams that monitor transactions for suspicious activity and operations, product and relationship teams.

EFFECTIVE DATES

The Rule will be implemented in two phases:

Phase 1 – March 20, 2026 – On this date, the Rule will apply to RDFIs with an annual ACH receipt volume exceeding 10 million entries in 2023.

Phase 2 – June 19, 2026 – The Rule will apply all other RDFIs.

TECHNICAL SUMMARY

Below is a summary of the impact of The RDFI ACH Credit Monitoring Rule on the Nacha Operating Rules. The Rules contain the impacted rule language as it will read upon implementation in highlighted, italicized text.

- *Article Three, Subsection 3.1.10 (Identification of Unauthorized Credit Entries or Credit Entries Authorized Under False Pretenses)* – New subsection requiring monitoring of incoming ACH credits by RDFIs.

Standard Company Entry Descriptions – Payroll and Purchase

SUMMARY

The Standard Company Entry Descriptions Rule (the Rule) will establish two new Company Entry Descriptions, PAYROLL and PURCHASE. The PAYROLL Company Entry Description must be used for ACH credits bearing the PPD Standard Entry Class Code that are for the payment of wages, salaries and other similar types of compensation. The objective of adding PAYROLL as a Company Entry Description is to reduce the incidence of fraud involving payroll redirections. RDFIs that monitor inbound ACH credits will have better information regarding new or multiple payroll payments to an account.

The Rule will also establish the Company Entry Description PURCHASE, which must be used for e-commerce purchases. An e-commerce purchase will be defined as a debit entry authorized by a consumer Receiver for the online purchase of goods. The new Company Entry Description will enable identification of such e-commerce transactions. The Rule defines e-commerce purchases for the purpose of using the new Company Entry Description.

IMPACT TO PARTICIPANTS

Originators, Third-Party Service Providers, Third-Party Senders, and ODFIs: Originators, Third-Party Service Providers, Third-Party Senders and ODFIs that handle payroll and e-commerce purchase transactions will need to update their systems to utilize the required Company Entry Descriptions.

RDFIs: RDFIs may choose to take advantage of intelligence enabled by the new Company Entry Descriptions and may need to update their policies and procedures to do so. However, RDFIs will not be required to act as a result of the descriptors.

EFFECTIVE DATE

The effective date for the Standard Company Entry Descriptions rule is March 20, 2026. Originators may begin using the new descriptions as soon as practical, but must do so no later than March 20, 2026.

TECHNICAL SUMMARY

Below is a summary of the impact of The Standard Company Entry Descriptions Rule on the Nacha Operating Rules. The Rules contain the impacted rule language as it will read upon implementation in highlighted, italicized text.

- *Appendix One, Part 1.2 (Data Specifications for ACH Records)* – Updated to include the new required descriptions “PAYROLL” and “PURCHASE” within the bullet list of Company Entry Descriptions that are required by the Rules to appear in upper case characters.
- *Appendix Three, Subsection 3.2.2 (Glossary of Data Elements)* – Updated to add a new standard Company Entry Description for e-commerce purchases.
- *Appendix Three, Subsection 3.2.2 (Glossary of Data Elements)* – Updated to add a new standard Company Entry Description for PPD credits for payment of wages, salaries and similar types of compensation.

Technical Summary of 2025 Changes to the Rules

The following is a technical summary of the change to the Nacha Operating Rules implemented during 2025. Please note that since this change is already effective, it is not marked within the text of the 2026 Rules.

APRIL 1, 2025 EFFECTIVE DATE

Approved March 15, 2024

RESPONSE TO ODFI REQUEST FOR RETURN

The Response to ODFI Request for Return Rule established a requirement that an RDFI must respond to an ODFI's request to return any entry, regardless of whether the RDFI complies with the ODFI's request for the return. The RDFI must advise the ODFI of its decision or the status of the request within 10 banking days of receipt of the ODFI's request. The objective of the Rule is to improve the recovery of funds when fraud has occurred.

- *Article Three Subsection 3.8.6 (Response to ODFI Request for Return)* – Added a new subsection requiring an RDFI to respond to an ODFI's request for the return within ten Banking Days.

Editorial Notes and Corrections

This section identifies editorial changes that have been made to the 2026 Nacha Operating Rules to correct minor drafting issues. The changes noted below have no impact on the substance of the rules or technical specifications and serve only to correct issues that could result in confusion for the reader.

- *Appendix One, Part 1.2 (Data Specifications for ACH Records)* – Nominal changes were made to column headings in the table illustrating the data specifications for ACH records for a more accurate description of the columns' contents.
- *Appendix Four (Return Entries), Appendix Five (Notification of Change), Appendix Six (Acknowledgment Entries)* – Nominal changes were made to a number of instructional footnotes in the sections below to more accurately identify the roles of parties transmitting and receiving Returns, Notifications of Change, and Acknowledgment Entries. Certain of these notes previously used confusing language that implied a change in ACH participant role (example: references to the ODFI of the return entry, rather than references to the RDFI transmitting the return). These types of references have been corrected throughout the sections noted below:
 - *Appendix Four (Return Entries), Part 4.3 – Record Formats for Return Entries*
 - *Appendix Four (Return Entries), Part 4.4 – Dishonored Return Entries*
 - *Appendix Four (Return Entries), Part 4.5 – Contested Dishonored ACH Return Entries*
 - *Appendix Five (Notification of Change), Part 5.4 – Record Formats for Notifications of Change*
 - *Appendix Six (Acknowledgment Entries), Part 6.4 – Record Formats for Acknowledgment and Refused Acknowledgment Entries*