



## 2019 NACHA Rule Changes

As part of our commitment to keep our Automated Clearing House (ACH) origination customers informed of changes regarding ACH electronic payments, we are providing the following summary of the 2019 Rule Changes by NACHA:

1. ACH Rules Compliance Audit Requirements, Effective January 19, 2019
2. Return for Questionable Transaction Rule, Effective June 21, 2019
3. Availability of Same Day ACH Credits, Effective September 20, 2019

This is only a summary and not intended to replace a detailed analysis your organization should perform to determine the specific impact these changes may have on your ACH origination processes.

For a complete list and description of the amendments and rule changes, visit [www.NACHA.org](http://www.NACHA.org).



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# 2019 NACHA Rule Changes

## **1. ACH Rules Compliance Audit Requirements, Effective January 19, 2019**

NACHA will consolidate all requirements for the annual Rules compliance audit within one section of the NACHA Operating Rules. Article One, Section 1.2.2 (Audits of Rule Compliance) adds a new subsection to consolidate the core audit requirements described in Appendix Eight under the general obligations of the Originators, Third-Party Service Providers and Third-Party Senders to conduct a Rules compliance audit. Appendix Eight (Rules Compliance Audit Requirements) will be eliminated in its entirety from the Rules.

## **2. Return for Questionable Transaction Rule, Effective June 21, 2019**

Under the Return for Questionable Transaction rule, RDFIs will be able (but not required) to use Return Reason Code R17 – File Record Edit Criteria to indicate that the RDFI believes the entry containing invalid account information was initiated under questionable circumstances. This use of R17 will be optional at the discretion of the RDFI. Those RDFIs that elect to use R17 for this purpose will be required to use the description “QUESTIONABLE” in the Addenda Information field of the return. This description in an R17 return will differentiate returns that appear to be suspicious to the RDFI from those due to routine account number issues. Originators should be aware of the new messaging conveyed via the R17 Return Reason Code and may wish to review such returns more closely.

## **3. Availability of Same Day ACH Credits SEPTEMBER 20, 2019**

For a credit Same Day transaction received in the first same-day processing window, a Receiving Depository Financial Institution (RDFI) must make the credit available to the Receiver for withdrawal no later than 1:30 p.m. (in the RDFI's local time) on the Settlement Date of the transaction (subject to its right to return under the Rules).