

2022 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 2022 Rule Changes by NACHA:

- 1. Same Day ACH Dollar Limit Increase, Effective March 18, 2022
- 2. Supplementing Data Security Requirements (Phase II), Effective June 30, 2022
- 3. Micro-Entries, Effective September 16, 2022
- 4. Third-Party Sender Roles and Responsibilities, Effective September 30, 2022

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.



2022 NACHA Rule Changes

1. Same Day ACH Dollar Limit Increase, Effective March 18, 2022

This rule will increase the Same Day ACH dollar limit to \$1 million per payment for all Same Day ACH entries; consumer and business payments, credits and debits.

2. Supplementing Data Security Requirements (Phase II), Effective June 30, 2022

This change impacts Originators and Third Party Service Providers (including Third Party Senders). The existing ACH Security Framework, including its data protection requirements, will be supplemented to explicitly require large, non-Financial Institution Originators, Third-Party Service Providers (TPSPs) and Third-Party Senders (TPSs) to protect deposit account information by rendering it unreadable when it is stored electronically.

• Phase 2 – June 30, 2022 Implementation for Originators and Third-Parties with ACH volume greater than 2 million in 2020

3. Micro-Entries, Effective September 16, 2022

This Rule will define and standardize practices and formatting of Micro-Entries, which are used by some ACH Originators as a method of account validation.

4. Third-Party Roles and Responsibilities, Effective September 30, 2022

Nested Third-Party Senders

- Defines a Nested Third-Party Sender
- Updates the requirements of Origination Agreements for a Nested TPS relationship
- Establishes the "chain of agreements" and responsibilities in a Nested TPS arrangement
- Updates existing TPS registration to denote whether a TPS has Nested TPS relationships

Third-Party Senders and Risk Assessments

- Makes explicit that a Third-Party Sender, whether Nested or not, must complete a Risk Assessment of its ACH activities
- Clarifies that a Third-Party Sender cannot rely on a Rules Compliance Audit or a Risk Assessment completed by another TPS in a chain; it must conduct its own