

NACHA 2026 First-ever Commercial ACH Fraud Mandates

What enterprise banks must do to comply

WHY THIS MATTERS NOW

For the first time, NACHA's fraud prevention mandates specifically target commercial payment transactions.

If you're an enterprise bank serving commercial clients, the rules have changed, and the countdown is on.



THE COMMERCIAL ACH TARGET

Commercial ACH has become a prime target for fraudsters:

\$150,000 - \$200,000

Median loss per commercial fraud incident

\$2.1B

Total bank transfer fraud losses in 2024

11%

Year-over-year growth in B2B ACH volume

More volume means more opportunity for fraud.

WHAT'S DIFFERENT IN 2026?

This isn't just another compliance update. NACHA's 2026 rules represent a fundamental shift:



First time mandates specifically cover commercial transactions



Both ODFIs (originators) and RDFIs (recipients) are now accountable



Non-compliance carries serious consequences, including fines up to \$500,000 per occurrence, mandatory corrective actions, and potential suspension from the ACH Network



Key dates: High-volume entities must comply by **March 20, 2026**. All other entities must comply by **June 22, 2026**

THE CHALLENGE FOR COMMERCIAL BANKS



Most banks start with spreadsheets, manual reviews, and one-off processes. But commercial ACH presents unique challenges:



High-dollar transactions make it harder to distinguish fraud from legitimate activity



Multiple payment channels beyond ACH need monitoring.



Legitimate high-velocity activity can look like fraud

A SOLUTION BUILT FOR ENTERPRISE BANKING: PAYMENTS FRAUD DEFENSE

Bottomline's Payments Fraud Defense (PFD) solution is purpose-built for the complexities of commercial payment fraud. Here's how it helps you meet the 2026 mandates.



For ODFIs: Complete Origination Monitoring

Using Payments Fraud Defense, whether as an attached solution or standalone, satisfies the NACHA requirements for Third Party Service Providers (TPSP) and Originating Depository Financial Institutions (ODFI).

What PFD does:

- ✓ Screens all originating transactions automatically
- ✓ Provides risk-based monitoring across all parameters
- ✓ Validates beneficiary accounts
- ✓ Reduces operational burden through automation
- ✓ Detects BEC, vendor impersonation, and payroll fraud
- ✓ Far less error-prone than manual processes

WHY BOTTOMLINE?

Commercial expertise:



- Leader in commercial fraud and payments
- Purpose-built for enterprise banking (\$10B+ AUM)
- Deep understanding of commercial customer differences

Faster and easier:

- 8-week turnaround for attached customers to meet deadlines
- Automated analytics reduce operational burden
- Enhance NACHA-recommended account validation with optional intelligence augmentation



More accurate:



- Monitors dollar amount, velocity, known behavior, and payment type simultaneously
- Reduces false positives versus manual or spreadsheet approaches

START NOW. STAY COMPLIANT.

- ✓ Evaluate current fraud prevention gaps across all commercial payment channels.
- ✓ Plan a combined ODFI and RDFI solution for full coverage.
- ✓ Consider a broader treasury fraud strategy conversation.
- ✓ Explore Digital banking + Payments Fraud Defense as a combined deployment.

Learn how Bottomline can help reduce losses, operational burden, and regulatory penalties.

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