

Your Nacha 2026 Readiness Checklist

HELPING YOU KEEP YOUR ACH PAYMENTS SECURE

Did you know the National Automated Clearing House Association (Nacha) has updated their risk management operating rules? If you issue Automated Clearing House (ACH) payments, these changes will influence how you operate and may impact your compliance obligations.

Nacha's rules exist to govern, standardize, and protect the ACH Network, ensuring that every electronic payment moves securely, accurately, and consistently across all participating financial institutions. Without them, the network could not function safely or reliably - and payments could be in jeopardy.

What's Changing With Nacha?

The new 2026 Nacha rule amendments address fraud monitoring, credit monitoring, standardized entry descriptions, and international ACH transactions (IAT).

**Use this checklist to see how ready your
business is, and where you may need support.**



Prepare Now with the Nacha 2026 Readiness Checklist



1. GOVERNANCE & DOCUMENTATION

Policies & Procedures

- Document ACH policies that reflect existing Nacha rules (authorization, data security, returns, audits).
- Update compliance manuals to incorporate Nacha's 2026 fraud monitoring requirements.
- Define responsibilities across Treasury, Operations, Fraud, Compliance, and IT.

Training & Communication

- Train staff on new fraud monitoring obligations (effective March and June 2026, depending on ACH volume).
- Educate treasury staff on Company Entry Description changes ("PAYROLL" and "PURCHASE").
- Provide guidance on IAT definition changes (effective Sept 18, 2026).



2. FRAUD & RISK CONTROLS

Fraud Monitoring

Phase 1 – Effective March 20, 2026 for participants with ≥ 6 million ACH originations in 2023

Phase 2 – Effective June 22, 2026 for all remaining participants

- Identify all non-consumer originators, Large Third-Party Service Providers (TPSPs)/Large Third-Party Senders (TPSS), and Receiving Depository Financial Institutions (RDFIs) meeting appropriate thresholds.
- Develop risk-based fraud monitoring processes for ACH entries (beyond WEB & micro-entry).
- Document procedures and establish annual review processes.
- Update internal policies to include "False Pretenses" fraud type.
- Train staff on new fraud detection requirements.

Account Validation

- Ensure processes validate new or changed accounts before first debit.

Return Monitoring

- Monitor unauthorized return rates to keep them below Nacha's 0.5% threshold.



3. FILE & TRANSACTION STANDARDS

Company Entry Descriptions – Effective March 20, 2026

- Update ACH templates to ensure correct descriptors ("PAYROLL" for wage credit entries, "PURCHASE" for consumer e-commerce debit entries).
- Review client file formats to ensure compliance.
- Test payment system updates for compliance.

International ACH Transactions (IAT)

- Update classification processes using the new 2026 IAT definition.
- Validate vendors and systems can handle new IAT logic.



4. FUNDS AVAILABILITY REQUIREMENTS

New 9:00 a.m. Posting Rule – Effective Sept 18, 2026

- Update posting schedules for non–Same Day ACH credits to ensure availability by 9:00 a.m. local time.
- Coordinate with payment systems to support earlier posting windows.



5. OPERATIONAL CONTROLS

Annual Audit

- Schedule and perform annual Nacha compliance audit and document findings.

Vendor & Third-Party Oversight

- Validate TPSPs, processors, and software vendors support all 2026 rule changes.
- Update contracts to reflect new fraud monitoring expectations.



6. TECHNICAL & SYSTEM CHANGES

Technology Upgrades

- Implement or enhance fraud monitoring systems.
- Update posting engines for 9:00 a.m. availability deadlines.
- Confirm payment gateways support new entry descriptions.

Testing & Validation

- Test updated ACH file formats and template logic.
- Conduct end-to-end testing with ODFIs/RDFIs.
- Validate that detection systems identify anomalies and suspicious entries.

EXECUTIVE SUMMARY CHECKLIST

2026 Nacha Readiness

- Fraud monitoring is planned or already in place.
- Company Entry Descriptions are updated.
- Posting schedules are updated for 9:00 a.m. availability.
- IAT classification logic is updated.
- Annual audit is scheduled and policy documentation is in place.
- All vendors and ACH Participants are aligned.

With the right tools in place, Nacha compliance becomes more than a requirement - it becomes a way to **reduce** risk, **strengthen** operations, and **protect** your business.

Bottomline can help you put the right safeguards, monitoring systems, and automation in place so you're fully prepared for the 2026 changes.



Let's get you ready.

Contact Us



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