



2026 ACH Rule Amendments Summary

Hello GBank ACH Clients,

As part of our commitment to keeping our ACH origination customers informed of ACH rule changes, we are providing you with the following summary of upcoming changes to the Nacha Operating Rules (“Rules”). The rules below are intended to enhance Risk Management within the Network for all parties, and some or all of these changes may not directly impact your organization. This summary details the impacts of these rule changes on the most common types of corporate origination services but is not intended to replace the detailed analysis needed to determine the impact these changes have on your specific organization.

1. Origination Fraud Monitoring

Phase 1 – Effective March 20, 2026, for all ODFIs, Originators, Third-Party Service Providers, and Third-Party Senders with ACH volume greater than 6 million in 2023

Phase 2 – Effective June 19, 2026, this will also apply to all ODFIs, Originators, Third-Party Services Providers, and Third-Party Senders that did not fall under Phase 1.

Summary

This rule will require all parties on the origination side of entries to have risk-based processes to identify fraudulently originated ACH entries.

Details

The Rules do not currently require Originators to have fraud monitoring processes, except for WEB debit entries. This new rule will have requirements for all entries with the goal of detecting and preventing fraud from scams such as business email compromise and fake invoices.

Impact

Originators may already have processes such as anomaly detection or other “flags” that detect and prevent fraudulent entries. Each organization will need to review its processes and procedures to determine whether it needs to make updates to meet these new requirements.

2. RDFI Fraud Monitoring

Phase 1 – Effective March 20, 2026, for all RDFIs with ACH receipt volume greater than 10 million in 2023

Phase 2 – Effective June 19, 2026, for all RDFIs

Summary

This rule will require RDFIs to have processes to review received credit entries to identify potential fraud.

Details

The Rules will not prescribe how RDFIs review entries and will not require RDFIs to review each entry; each RDFI will determine how to comply with this requirement based on its environment.

Originator and Third-Party Sender Impact

This rule, along with the additional exception for funds availability and use of the R17 return reason code, will likely result in more returns of fraudulent entries, reducing losses for Originators, Third-Party Senders, and ODFIs. It may also cause delays in RDFIs posting received entries as they investigate potential fraud.

3. Company Entry Descriptions

March 20, 2026

Summary

The Rules will require specific company entry descriptions for payroll entries and online purchases of goods.

Details

Originators will be required to use the description "PAYROLL" for PPD credits to pay wages, salaries, and other compensation.

Originators will be required to use the description "PURCHASE" for e-commerce purchases, which will be defined as "a debit Entry authorized by a consumer Receiver for the online purchase of goods."

Originator and Third-Party Sender Impact

Originators will need to review the company entry descriptions they use in ACH files and ensure they update these descriptions as required by the Rules. These standardized descriptions will help improve processes to monitor entries for potential fraud. Originators can begin using this description anytime but must comply with the requirements by the implementation date.

The ACH Network and Nacha Operating Rules continue to evolve to meet the needs of businesses, governments, and consumers who use the network to initiate over \$50 trillion in transaction value each year. The Rules can be difficult to understand, but we can assist with questions to help your company better utilize the ACH Network. Feel free to call GBank Treasury Management at 702-851-4200.

Additional information may be found on the Nacha website by visiting their website listed below,

www.nacha.org/corporates

Sincerely,

Robert Newman
SVP & Treasury Operations Manager
GBank