

CONSUMERS

National Bank

2026 NACHA Rule Updates Guidelines to Ensure Compliance for ACH Originators

Fraud Monitoring Controls

- Have processes in place to look for both unauthorized transactions and transactions that were authorized but based on fraud (such as business email compromise or fake vendor requests).
**This rule amendment will require all non-Consumer Originator, Third-Party Service Provider, and Third-Party Sender that did not fall under the requirement threshold for Phase 1, to establish and implement risk-based processes and procedures reasonably intended to identify ACH Entries initiated due to fraud.*
- Promptly review and investigate any unusual or suspicious ACH activity.
- Review and update ACH fraud-monitoring processes at least once a year to address new or emerging risks.

Payment Instructions, Dual Control & Change Verification

- Employees should not rely upon emails when confirming changes to payment instructions.
- When vendor or payroll payment instructions change, **independently verify the change** using a different communication method (for example, calling a known phone number instead of replying to an email).

Standard Company Entry Descriptions

- Standard Company Entry Description – “PAYROLL”
**This rule requires Originators to use the standardized Company Entry Description “PAYROLL” for PPD credits for payment of wages, salaries and similar types of compensation.*

ACH Authorizations & Record-keeping

- Obtain NACHA-compliant authorizations for every ACH transaction originated.
- Authorizations should be kept on file and can be provided upon request, consistent with NACHA record-retention rules.
- Company authorization process should be reviewed at least once a year.

Annual Employee Training & Awareness

- Employees involved in ACH origination should be trained on common fraud risks such as business email compromise, payroll diversion, and invoice fraud.
- Training explains how and when to escalate suspicious ACH activity, verification, and release.