

Payments Update

## Credit Union Strategies in Responding to Nacha Operating Rules Amendment

October 1, 2025

**AuditLink**

## **Legal Disclaimer**

The information contained in this document does not constitute legal advice. We make no claims, promises or guarantees about the accuracy, completeness, or adequacy of the information contained in this document. You should retain and rely on your own legal counsel, and nothing herein should be considered a substitute for the advice of competent legal counsel. These materials are intended, but not promised or guaranteed to be current, complete, or up-to-date and should in no way be taken as an indication of future results. All information is provided "as is", with no guarantee of completeness, accuracy, timeliness or of the results obtained from the use of this information, and without warranty of any kind, express or implied, including, but not limited to warranties of performance, merchantability and fitness for a particular purpose. In no event will CU\*Answers, its related partnerships or corporations, or the partners, agents or employees thereof be liable to you or anyone else for any decision made or action taken in reliance on the information provided or for any consequential, special or similar damages, even if advised of the possibility of such damages.

## Executive Summary

---

Effective March 20, 2026, the National Automated Clearing House Association (“Nacha”) amended its fraud monitoring rules. Nacha’s intent with these rule changes is to reduce the incidents of successful fraud attempts by requiring Receiving Depository Financial Institutions (RDFIs) to proactively monitor potential fraud. **The main takeaway from this Rule Amendment is a call to action to implement risk-based processes and procedures to identify possible instances of fraud.** CBX has tools today to assist credit unions with compliance with these rule changes, as well as additional functionality in development. Credit unions are ultimately responsible to have policies and procedures that align with the Nacha rule changes.

An action plan for RDFIs to consider is:

1. Review the Rules Amendments carefully, and update policies and procedures as needed.
2. Review and implement as part of its processes the upcoming “Stop-No-Go” tools as needed to ensure the institution is ready for the March 20, 2026, compliance deadline.

## Revision to Fraud Monitoring Rules

---

The [Nacha Rules Amendments](#) are as follows:

### ***Fraud Monitoring by Originators, TPSPs and ODFIs***

*This rule amendment will require all ODFI, and each non-Consumer Originator, Third-Party Service Provider, and Third-Party Sender with annual ACH origination volume in 2023 of 6 million or greater, to establish and implement risk-based processes and procedures reasonably intended to identify ACH Entries initiated due to fraud.*

*Effective Dates:*

*Phase 1 – March 20, 2026, this rule will apply to all ODFIs, and further, to non-Consumer Originators, TPSPs, and TPSs with annual ACH origination volume of 6 million or greater in 2023.*

*Phase 2 – June 19, 2026, this rule will apply to all other non-Consumer Originators, TPSP, and TPS.*

### ***RDFI ACH Credit Monitoring***

*This Rule will require RDFIs with annual ACH receipt volume of 10 million or greater in 2023 to establish and implement risk-based processes and procedures designed to identify credit Entries initiated due to fraud.*

*A risk-based approach to monitoring can consider factors such as transactional velocity, anomalies, and account characteristics. This aligns with AML monitoring practices in place today.*

*Effective Dates:*

*Phase 1 – March 20, 2026, the rule will apply to RDFIs with annual ACH receipt volume of 10 million or greater in 2023.*

*Phase 2 – June 19, 2026, the rule will apply to all other RDFIs.*

*Finally, this includes acknowledgement of the defined term, False Pretenses – the inducement of a payment by a Person misrepresenting (a) that Person’s identity, (b) that Person’s association with or authority to act on behalf of another Person, or (c) the ownership of an account to be credited.*

Note that credit unions should review the changes from the original proposal by NACHA. NACHA eliminated “commercially responsible” as a standard. Furthermore, the rule makes a clear distinction that it does not require pre-posting monitoring of credit entries.

NACHA acknowledges that ACH transaction monitoring may already be transpiring, and this amendment encourages the necessary communication between compliance monitoring, operations, product management, and relationship staff. If not already compliant, RDFIs need to establish processes and procedures reasonably intended to identify entries that are suspected of being unauthorized.

The summary of these amendments is as follows:

- Eliminates use of “commercially reasonable” as a standard.
- Replaces “detection system” with “processes and procedures.”
- Provides a next level description of requirements – i.e., “reasonably intended to identify...”
- Provides that the requirements apply “to the extent relevant to the role the entity plays.”
- Allows an ODFI to expressly consider steps that other participants in origination are taking to monitor for fraud in designing its own processes and procedures.
- Clarifies that monitoring is not required pre-processing.
- Requires a review of processes and procedures “at least annually.”

## **Risk-Based Approach**

---

Although NACHA sets forth a definition of “risk-based” and provides examples in the Rule Amendment, credit unions are still allowed interpretation. There are no specific set of standards for each RDFI. The basics of the approach are as follows:

- A risk-based approach to fraud monitoring enables RDFIs to apply resources based on risk assessment for various types of transactions.
- A risk-based approach to fraud monitoring enables financial institutions, Originators, and other parties to apply resources based on a risk assessment for various types of transactions. A party might take extra measures to detect fraud in transactions in which it has determined risks to be elevated; take basic precautions where it has determined that risks are lower, and exempt transactions or activities that it determines involve very low risk.
- A risk-based approach should not be used, however, to conclude that no monitoring is necessary at all. At a minimum, an entity applying a risk-based approach should conduct a risk assessment to identify and differentiate higher-risk from lower-risk transactions.

## Tools Available in CBX

---

**Abnormal Activity Patterns.** Abnormal Activity Monitoring tools are available through CBX today. Tool #101 allows credit unions to set configurations for multiple origin codes (including ACH) to monitor for abnormal activity among your membership. These patterns are broken down into three categories.

- Idle Activity. Looking for activity where there has not been any for a configurable number of days.
- Out of the Ordinary. Percentage increase in members activity compared to a previous configurable number of days.
- Velocity. Uncovering significant increases in transaction volume for a membership.

These tools can be utilized as a part of your risk-based approach to monitoring for abnormal ACH activity. Importantly for compliance, these tools allow credit unions to flag transactions and review the following day.

For more information on Abnormal Activity Patterns see the AuditLink booklet below or reach out to the AuditLink team at [info@auditlinksuite.com](mailto:info@auditlinksuite.com).

[Abnormal Activity Monitoring Transaction Patterns: A Guide for Change Management and Data Governance - CU\\*Answers Store](#)

**Stop-No-Go ACH Patterns.** As part of our 25.10 release project #63138 will be implemented. This project adds a new functionality in tool #101 titled “Stop-No-Go”. New configurations will allow credit unions to set both velocity and large ACH dollar mount thresholds that if exceeded will cause items to be added to your exceptions prior to posting. Allowing credit unions to review the ACH and return if necessary or manually post after conducting due diligence.

For more information, please see our 25.10 release summary below.

<https://www.cuanswers.com/wp-content/uploads/25-25-10-Release-Summary.pdf>