

Allied INSIGHTS

Fraud & Security RISK ALERTS

Timely insights to protect against fraud and mitigate risks

2026 NACHA Operating Rules Changes

SUMMARY

The [2026 NACHA Operating Rules](#) represent a meaningful shift toward proactive fraud detection, risk monitoring, and standardized ACH data practices. Financial Institutions should act now to update controls, systems, and documentation for compliance well before the key effective dates in March 2026, June 2026, and September 2026.

Engagement across compliance, IT, operations, risk, and senior leadership will be essential to managing risk and regulatory expectations in the evolving ACH landscape.



KEY 2026 RULE CHANGES & COMPLIANCE DEADLINES

- **ACH Credit Fraud Monitoring (Phase 1) – March 20, 2026**
Financial Institutions that originate or receive high volumes of ACH (based on 2023 activity) must implement risk-based fraud monitoring processes and procedures reasonably designed to identify ACH entries initiated due to fraud.
- **Fraud Monitoring (Phase 2) – June 22, 2026**
All remaining originators, third-party senders/service providers, and financial institutions must implement risk-based fraud monitoring.
- **Funds Availability – September 8, 2026**
The requirement for funds availability at 9:00 a.m. local on settlement date now applies to all non-Same Day ACH credits, eliminating the prior 5:00 p.m. receipt condition.

RECOMMENDED ACTIONS

- **ACH Risk & Compliance Assessment**
Perform a thorough gap analysis against the new rules and the NACHA Risk

Management Framework.

- **Update ACH Policies & Procedures**
Consider updates to ACH risk policies, including fraud monitoring, credit monitoring, annual review processes, and exception escalation workflows. Document how ACH fraud monitoring is risk-based, including risk factors considered, such as volume, dollar thresholds, return rates, account age, and origination patterns.
- **Enhance Detection Tools**
Evaluate automated monitoring systems capable of alerting on suspicious or anomalous ACH behavior.
- **Staff Training & Awareness**
Educate operations, compliance, and risk teams on the new standards and expectations.
- **Vendor & Partner Coordination**
Ensure third-party senders/receivers and processing partners are aligned with NACHA's 2026 requirements.
- **Board & Executive Reporting**
Communicate the status of NACHA compliance efforts at the board/risk committee level.

RISK MITIGATION RESOURCES

- [Learn](#) more about the 2026 NACHA New Fraud Monitoring Rules.
- [Visit](#) our **NEW** Fraud Prevention Center!

Need assistance or want to request a consultation?
Contact our risk specialists at risk_specialist@alliedsolutions.net

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