



## Same Day ACH

### ***\$1,000,000 Per-Transaction Limit Guidance*** **March 1, 2022**

On March 18, 2022, the dollar limit on large-dollar Same Day ACH Entries will be raised from \$100,000 to \$1,000,000 per entry.

The limit on large-dollar transactions (those ACH Entries over \$1,000,000) applies to individual transactions; i.e., a single Same-Day ACH transaction can not be for more than \$1,000,000. There is no similar limit on the aggregate value of a batch of Same-Day ACH transactions. Entries submitted in a same-day processing window that are over \$1,000,000 will not be rejected by the ACH Operator, but will be processed for next-day settlement in the next available processing window.

As with previous Same Day ACH dollar limits, transactions may not be restructured to evade the \$1,000,000 limit. For example, if a business has a loan payment of \$1,500,000 due, that payment would not be eligible for Same-Day ACH and should not be divided and sent as multiple same-day Entries in order to avoid the per-transaction dollar limit. However, if a business is paying multiple invoices from the same supplier that each amount to \$1,000,000 or less, each invoice could be paid using a distinct Same-Day ACH transaction. Originators should be educated to avoid attempts at structuring Entries in order to evade the per-transaction dollar limit. Since evasion can be a very fact specific inquiry, Nacha will consider evasion issues on a case-by-case basis.

The information contained within this document is an informal interpretation intended to provide general guidance by Nacha staff in interpreting the *Nacha Operating Rules*. The interpretation is not an official position of Nacha and is not binding on Nacha staff, the Nacha Board or any ACH Rules Enforcement Panel. All applications of the *Nacha Operating Rules* are subject to facts and circumstances of the specific case. Readers of this document should obtain their own legal advice regarding their obligations under the *Nacha Operating Rules* or applicable legal requirements.