



ACH Operations Bulletin #1-2024:

Changes to Upcoming Rules Effective Dates

July 1, 2024

Summary

The effective date of recently adopted rules language requiring an RDFI to notify the ODFI of the status of a request for return within 10 banking days has been extended by 6 months to April 1, 2025.

In addition, two upcoming rules have effective dates of Friday, June 19, 2026. As this is a federal holiday, the practical effective date for these two rules will be the next banking day – Monday, June 22, 2026.

Discussion

Expanding the ODFI Request for Return

On March 15, 2024, Nacha members approved¹ a rule that expands the reasons for which an ODFI may request the return of an entry and establishes a new requirement for the RDFI to respond to the ODFI when it receives such a request. Specifically, upon implementation, an ODFI will be permitted to request the return of an entry for any reason, and the RDFI will have an obligation to advise the ODFI of its decision or the status of the request within ten (10) banking days of receipt of the ODFI's request. These changes were approved with an effective date of October 1, 2024.

Nacha has received a number of comments about the ability of RDFIs to be able to comply with the new requirement by the October 1 effective date. Nacha's Rules and Operations Committee recommended extending the effective date for the specific portion of the new rule that requires RDFIs to respond to the ODFI, and the Nacha Board of Directors approved such an extension to April 1, 2025.

This extension applies only to new Rules Subsection 3.8.6, which is the portion of the rule requiring a response by RDFIs.

SUBSECTION 3.8.6 Response to ODFI Request for Return (New Subsection – Effective April 1, 2025)

An RDFI may, but is not obligated to, comply with an ODFI's request for the return of an Entry, as provided under Subsection 2.13.2 (ODFI Request for Return). Regardless of whether the RDFI complies with the ODFI's request to return the Entry, the RDFI must

¹ See Supplement #1-2024 to the Nacha Operating Rules.

advise the ODFI of its decision or the status of the ODFI's request within ten (10) Banking days of receipt of the ODFI's request.

Changes enabling ODFIs to request the return of an entry for any reason recognize current industry use of the ODFI Request for Return process and will still become effective on October 1, 2024. RDFIs should recognize that they may receive such requests from ODFIs "for any reason" prior to the extended response deadline of April 1, 2025.

Nacha strongly encourages RDFIs to work toward compliance as soon as possible. In addition, a new feature will go live in the Risk Management Portal prior to the April 1, 2025, effective date that will enable an RDFI to provide such a notification to the ODFI through the portal.

June 19, 2026, Rules Effective Date

Two risk management rules were recently approved with Friday, June 19, 2026, as the effective date²:

- Fraud Monitoring by Originators, Third-Party Service Providers/Third-Party Senders and ODFI (Phase Two).
- ACH credit monitoring by RDFIs (Phase Two).

As June 19 is a federal holiday, the practical effective date for these two rules will be the next banking day – Monday, June 22, 2026. All affected parties are encouraged to become compliant with these rules as soon as possible, but no later than June 22, 2026.

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² See Supplement #1-2024 to the Nacha Operating Rules.