

The Value Proposition of Corporate ACH Origination in Payments

By Mark J. Dixon, AAP, APRP, CTP, NCP Senior Consultant • Nacha Consulting

INTRODUCTION

The ACH Network was formed in the 1970s and was created to solve that era's challenge of slow check processing and clearing by offering a faster electronic means of money movement. The ACH Network is a credit push and debit pull network that enables an originating party to credit or debit a receiver, respectively. ACH entries can be future-dated, and most ACH payments can be processed on the same day. The robust and unique functionality and design of the ACH Network make it one of the prominent payment mechanisms in the United States today, and it also supports international payments.

The ACH Network continues to grow and thrive, seeing significant transaction and volume increases in multiple areas. There were 33.6 billion ACH payments totaling \$86.2 trillion in 2024. Same Day ACH volume was 1.2 billion payments totaling \$3.2 trillion, a 45.3% increase in volume and a 33.3% increase in value year over year (2023/2024). FY24-ACH-Network-Infographic

Different Ways ACH Payments are Used

ACH is a foundational part of the payments ecosystem and critical for financial institutions to meet the robust needs of their customers and members. One area that continues to be significant is ACH origination services. To enable the most widely adopted form of electronic funds transfer (EFT), ACH origination is a critical aspect of payment service offerings and supports many use cases, including:

For Consumers:

- Person-to-Person (P2P) One person paying another person.
- Account-to-Account (A2A) Transfers from one account to another at a different financial institution.

For Businesses:

- **Consumer-to-Business (C2B)** Payments made to businesses by consumers.
- Business-to-Consumer (B2C) Payments collected/disbursed by businesses from consumers.
- Business-to-Business (B2B) Payments made by one business to another.

For Government Agencies:

- **Government-to-Consumer (G2C)** Payments collected and disbursed by a government agency to a consumer.
- Consumer-to-Government (C2G) Payments made to a government agency by a consumer.
- **Government-to-Business (G2B)** Payments collected/disbursed by a government agency to a business.
- Business-to-Government (B2G) Payments made by a business to a government agency.

For International Payments:

• **Cross Border Payments** – Payments that cross international borders via International ACH Transaction (IAT) Entry.

The Role of ACH Payments for Businesses

Corporate origination is a type of ACH origination that enables businesses to harness the power of payment processing. It is considered a critical element of any effective treasury suite of payment services as it allows for many primary use cases related to accounts payable (AP) and accounts receivable (AR) that a business would require.

Due to its critical place within business banking services, many financial institutions currently offer or are in the process of developing ACH origination services designed to meet the needs of this customer segment. Not all corporate origination programs are created equally. Businesses come in all shapes and sizes, and their needs may vary, and programs are developed to meet these different needs. Consider the following business type categories:

- Micro/Sole Proprietor Small shop specialized service companies are typically operated by fewer than 10 people, including active management by the principal. Micro businesses may have tighter margins and lower net incomes, often earning less than \$1 million in annual revenue each year. Payment needs for these types of businesses tend to be simple, with many one-off transactions conducted.
- **Small Businesses** These types make up many U.S. businesses. These businesses may have under 50 employees, defined departments and roles, focused operations and a local presence. Annual revenue is usually in the \$1 million to \$10 million range. Payment needs for these types of businesses include payroll, vendor payments, banking consolidation and reporting.
- Mid-Market Enterprise These are more complex business types with a local, regional or national presence. They employ between 50 and 500 people, are well-defined in organizational structure and reporting, and likely have scaled operations, multiple product/service lines, and a focus on economies of scale. Annual revenue is typically in the \$10 million to \$1 billion range. Payment needs for these types of businesses tend to be more complex, with domestic and international considerations and more advanced treasury needs like sweep services, account reconciliation programs (ARP), and positive pay.
- Large Enterprise These are highly structured and well-organized companies that offer a range of
 products and services, including high-cost ones and focus on R&D and compliance efforts. Large
 enterprises likely have a complex organizational structure with global operations and multiple
 divisions. They likely have over 500 employees and revenues exceeding \$1 billion annually. Payment
 needs for these types of businesses are complex, with full-service offerings, automation, and
 straight-through processing (STP), controlled disbursement, third-party payments, direct access
 considerations, and robust fraud controls.

Regardless of the size and complexity of the business, ACH origination offers all businesses core payment functionality needed for functions such as payroll, bank account consolidation and general AR/AP functions. ACH provides businesses with cost efficiency, scalability and enhanced financial control, making it indispensable in a digital-first economy.

Understanding ACH Origination

ACH Origination is a form of EFT that enables any party to transmit credit or debit Entries to Receiver accounts. ACH credits refer to an Entry that credits a Receiver account (e.g., payroll Direct Deposit). ACH debits refer to an Entry that debits a Receiver account (e.g., Direct Payment). An Originator creates ACH Entries through an Originating Depository Financial Institution (ODFI) which then transmits the Entries to an ACH Operator (the Federal Reserve or The Clearing House EPN). The ACH Operator will determine settlement for the Entries and distribute them to the Receiving Depository Financial Institution (RDFI), which will then post the Entry to a Receiver's account or may choose to return ACH exception items to the Operator for disposition back to the ODFI.

ACH Origination Participants

The ACH Network includes multiple participants, and a few key participants covering many aspects of ACH processing are highlighted here.

Financial Institutions:

- **Receiving Depository Financial Institution (RDFI)** The financial institution that receives ACH Entries from its Operator and posts them to Receiver accounts.
- **Originating Depository Financial Institution (ODFI)** The financial institution that originates ACH entries, either for its own purposes or for Originators, and transmits them to the ACH Operator to be distributed to RDFIs.

End Users:

- **Receiver** The party that has authorized the Originator to receive the credit or debit Entry that posts to their account.
- **Originator** The party that originates a credit or debit Entry to a post to a Receiver's account and has a valid authorization in place for said origination.

Operators:

• **ACH Operator** – The Fed or The Clearing House EPN that receives ACH Entries from ODFIs, validates files, determines settlement and distributes Entries to RDFIs.

Third Parties:

- **Third-Party Service Provider (TPSP)** An organization performing ACH-related functions for Originators, Third-Party Senders, or RDFIs, such as processing Entries, file creation, or acting as a sending or receiving point.
- **Third-Party Sender (TPS)** A type of TPSP that acts as an intermediary between Originators and ODFIs for ACH Entries where there is no origination agreement between the ODFI and Originator but there are agreements between the ODFI and TPS and the TPS and Originator.
- **Nested Third-Party Sender** A Third-Party Sender with an Origination Agreement with another TPS to act on behalf of Originators that do not have agreements with the ODFI.

Types of ACH Transactions:

ACH supports many transaction types under the AR/AP buckets, including Direct Deposits and Direct Payments. While many transaction codes address specific ACH transaction types—Standard Entry Class Codes (SECs)—this section highlights some of the most commonly used ones.

• Prearranged Payment and Deposit Entry (PPD)

o A credit or debit Entry originated by an Organization to a Consumer Account of a Receiver based on proper authorization (typically in writing or similarly authenticated).

• Internet-Initiated/Mobile Entry (WEB)

- A credit Entry initiated on or on behalf of a Consumer Account and intended to post to a Consumer Receiver Account regardless of how the authorization was obtained. Commonly associated with P2P transactions.
- o A debit Entry authorized by an Originator to a consumer account is based on authorization obtained via the internet or wireless network. It does not include oral communication via telephone initiation.
- Telephone-Initiated Entry (TEL)
 - o A debit Entry originated to a Consumer Account based on an oral authorization obtained via the telephone. An existing relationship between the Originator and Receiver must exist.
- Corporate Credit or Debit Entry (CCD)
 - o A credit or debit Entry originated by an organization to another organization containing up to one addenda record of payment-related information (remittance).

• Corporate Trade Exchange (CTX)

 A credit or debit Entry originated by an organization to another organization containing up to 9,999 addenda records of payment-related information (remittance). Commonly used to pay multiple invoices in one payment, providing invoice details in the addenda records.

Same Day ACH

Same Day ACH refers to an ACH Entry whose settlement date is the same day as the one on which it originated. Same Day ACH enables same day settlement and is contingent on transmitting Entries within the following windows:

Processing window	ODFI deadline	RDFI receipt	Settlement	Funds Availability
Same Day ACH (1st window)	10:30 a.m. ET	12 noon ET	1:00 p.m. ET	1:30 p.m. RDFI local time
Same Day ACH (2nd window)	2:45 p.m. ET	4:00 p.m. ET	5:00 p.m. ET	5:00 p.m. RDFI local time
Same Day ACH (3rd window)	4:45 p.m. ET	5:30 p.m. ET	6:00 p.m. ET	End of processing day
Next day ACH	2:15 a.m. ET	6:00 a.m. ET	8:30 a.m. ET	9 a.m. local time*

*If the entry was made available to the RDFI by its ACH Operator by 5 p.m. local time. Otherwise, the end of the settlement day.

Value Proposition of ACH Origination

Corporate ACH origination offers businesses an efficient, secure, and cost-effective way to manage payments and address cash flow. Leveraging ACH origination allows companies to streamline disbursements and collections while reducing reliance on other payment methods like checks, wire transfers or cards, which may not offer the same functionality, speed and low cost of ACH.

• Cost Efficiency

 ACH payments are significantly less expensive than other payment methods, such as wire transfers or card payments, making them an ideal solution for high-volume payment needs. This cost savings benefits businesses by reducing overhead expenses associated with processing payments.

Improved Cash Flow Management

 ACH origination allows businesses to control the timing of debits and credits precisely, enabling better cash flow forecasting and liquidity management. Businesses can schedule payments in advance to optimize working capital and reduce the risk of delinquent payments or overdrafts.

• Operational Efficiency

 ACH origination eliminates the manual processes associated with physical payment methods, such as issuing and reconciling checks. ACH also includes addenda records that provide additional remittance payment details, which can enhance reconciliation processes. Automation can reduce errors, save time, and allow employees to focus on more strategic tasks.

• Security and Reliability

o ACH payments are transmitted under Nacha Rules requirements related to data security, monitoring, authentication and other required controls. Value-added services such as debit blocking and ACH positive pay also enhance ACH security.

• Nationwide and International Reach with Expanding Capabilities

 The ACH Network connects nearly all U.S. financial institutions, ensuring nationwide access to EFT payment capabilities. ACH supports international payment movement through IATs, expanding its international reach. Additionally, innovations such as Same Day ACH, with additional settlement windows, expand the potential for faster transactions, offering flexibility to businesses that require quicker settlement times.

• Scalability

o ACH origination grows with your business, accommodating increasing transaction volumes without the need for significant infrastructure upgrades or added processing costs.

Corporate ACH origination delivers business value by reducing costs, improving efficiency and providing greater payment control. It is an essential tool for companies looking to modernize their financial operations, optimize cash flow and support long-term growth in the robust payments landscape.

Use Cases and Benefits

ACH Origination provides businesses with many use cases related to AR/AP and general funds management. This section explores commonly associated use cases.

Payroll Processing

 ACH Direct Deposit pays employees efficiently and securely, eliminating the need for paper checks, which reduces processing costs and ensures employees receive their wages on time. ACH Direct Deposit is ideal for salaried, hourly and freelance (Gig) workers.

• Vendor Payments

o Direct Pay via ACH can be used for suppliers and vendors, reducing payment processing time and costs associated with issuing checks. ACH supports early payment discount programs by scheduling vendor disbursements on specific dates.

• Customer Billing and Recurring Payments

 ACH can collect recurring payments through ACH debit, such as subscriptions, membership fees or loan payments. ACH can also support automated invoice collections for B2B customers with scheduled payments. ACH can reduce delinquent payments by streamlining the accounts receivable process.

• Expense Reimbursements

o Like with payroll, ACH can be used to reimburse employees for travel and business expenses quickly and directly to their bank accounts. With options including Same Day, companies can avoid delays and additional costs associated with manual reimbursement processes.

• Healthcare Payments

 ACH can be used to facilitate claims processing and payments between healthcare providers, insurers and policyholders. Companies can collect patient payments for copays, deductibles or recurring healthcare plans via ACH debit and benefit from the data in ACH addenda records.

• Utility Payments

o Utility companies can automatically collect monthly customer bills through ACH debit, reducing AR aging schedules and positively impacting cash flow.

• Real Estate and Rent Collections

o Property management firms can collect monthly rent payments or fees from tenants electronically through recurring ACH debits, reducing the need for manual bank trips or managing record retention for remotely deposited checks.

E-Commerce

 Companies with an online presence can use ACH payment for products and services, offering a cost-effective alternative to credit card transactions by increasing customer payment options and reducing drop rates.

Religious and Nonprofit Donations

o Nonprofits can collect one-time or recurring donations through ACH debits, lowering processing costs and streamlining bookkeeping processes.

These use cases highlight the versatility and efficiency of corporate ACH origination, making it an indispensable tool for businesses across industries looking to optimize their payment operations. They do not represent every use but provide a broad cross-section for showcasing the value of ACH origination to businesses.

Compliance and Risk Management Considerations

Establishing and managing an effective corporate origination program has many benefits. However, it also requires addressing various regulatory and rule compliance requirements and appropriate risk management practices. In this section, we explore some key considerations.

• Regulatory and Rules Compliance

- Nacha Compliance: ODFIs, Third Parties and Originators must adhere to the Nacha Operating Rules & Guidelines regarding ACH originations. Many of these requirements are addressed in Article Two, including developing a risk management program that addresses origination activities like onboarding/KYC, monitoring, restriction enforcement and Originator ACH compliance education. Authorization requirements are paramount to the integrity of the ACH Network, and participants must ensure appropriate authorizations are in place for originated entries. File formatting and proper SEC code usage are required based on the type of transaction. Origination return rate thresholds must not be exceeded, and practices must be established to ensure this compliance. ACH transactions are subject to data security requirements, and additional monitoring and controls may be needed depending on the type of origination activity. This is just a quick snapshot of Nacha Rules requirements.
- o Some other key regulatory considerations include the following areas:
 - BSA/AML/OFAC Addressing appropriate monitoring practices to identify, address, and mitigate the risk of potential financial crime activity and ensure originations do not include parties that may be on the Sanctions list.
 - Regulation E (EFTA) protects consumers regarding electronic funds transfers (EFTs), including ACH Entries. Reg E formalizes error resolution practices, which require proper investigation and resolution when issues related to consumer transactions arise. For ODFIs and Originators, there is a risk of return of Entries related to claims of the entry being authorized, which can result in losses occurring up to 60 calendar days after settlement and up to two years later in cases of breach of warranty¹.
 - The Uniform Commercial Code 4A (UCC 4A) addresses the obligations and requirements of financial institutions concerning wholesale credits, which includes CCD and CTX ACH originations. While businesses are not protected by the consumer protections of Regulation E, UCC 4A (model state law adopted by each state) does provide protections against unauthorized ACH originations and establishes requirements regarding commercially reasonable security procedures that can help protect Originators and mitigate Fl's risks.

¹ Breaches of authorization warranty related to unauthorizes consumer Entries may also include the Entries from the first identifies unauthorized Entry and 95 days forward on top of the two years. Breach of warranty issues regarding non-consumers are limited to 1 year.

Fraud Prevention

- All payment mechanisms are subject to potential fraud attacks, and ACH origination is no exception. With its unique nature of being able to both credit and debit a Receiver's account, fraud attacks can include both fraudulently induced attempts against the Receiver, pushes of illegitimate credits from an Originator, and scammers involved with both Originators and Receivers who perpetrate fraud. Account takeovers and business email compromise (BEC) are two common scenarios that impact ACH fraud.
- o To address the potential of fraud, ODFIs should ensure they implement strong authentication controls, address contractual and agreement considerations and implement anomalous detection systems leveraging real-time monitoring models, which may be powered by advanced analytics and AI.

• Risk Management

- ACH origination requires careful consideration regarding risk management. When developing
 a risk management program, the Nacha Rules require taking the first step of performing
 a program risk assessment. Risk assessments identify program risks, evaluate controls,
 determine residual risk and then provide enhancement recommendations for program
 and control. From this risk assessment, the Nacha Rules require ODFIs to implement risk
 management programs which, at minimum, address Originator onboarding, monitoring,
 exposure limits and transaction restriction enforcement. In practice, risk management
 programs also address key areas of program risk and define the control structure in place.
- Another key area in risk management is third-party risk management. Third parties, typically technology providers, Third-Party Senders and fintechs that integrate into ACH origination services, provide added complexity and reliance on outside risk management controls. ODFIs must have well-developed programs geared toward addressing third-party risk management.

Addressing compliance and risk management considerations is critical to successfully developing an effective ACH origination program. This section defines some of the key high-level areas of concern. Still, institutions looking to build their own programs should ensure that all areas of risk and compliance have been identified and appropriately addressed.

Future State Opportunities for ACH Origination

Advancements in Same Day ACH, AI-powered payment operations, and Banking as a Service (BaaS) are all shaping the future of ACH origination. These innovations will enhance the speed, intelligence, and accessibility of ACH while demonstrating its continued relevance and need in an ever-evolving payment ecosystem.

Same Day ACH Expansion – Extended transaction limits (Currently \$1 million), extended processing windows, and AI-driven decisioning continue to make Same Day ACH more viable for high-value B2B payments, payroll and just-in-time vendor disbursements. The current processing windows and potential for possible additional Same Day ACH windows in the future also enable ACH to be received and settled faster than traditional future-date Entries.

- Artificial Intelligence (AI) in Payment Operations AI enables robust data analytics, real-time risk scoring, predictive cash flow management, automated exception handling, and intelligent payment routing—optimizing ACH processing efficiency and fraud mitigation. As AI continues to integrate into payment operations, the opportunities to maximize the effectiveness of ACH as a payment mechanism are amplified.
- Banking as a Service (BaaS) and Embedded ACH ACH origination continues to become more accessible through BaaS providers, allowing businesses to integrate ACH via APIs for seamless disbursements, payroll and vendor payments. Coupling BaaS with AI-driven compliance tools and Pay by Bank models will further streamline onboarding and risk management practices, furthering the value and use of ACH.

By leveraging faster processing, Al-driven automation, and embedded finance models, ACH will continue evolving as a critical payment rail for businesses seeking cost-effective, efficient, and modern payment solutions.

CONCLUSION

Corporate ACH origination offers businesses a powerful way to optimize payments, reduce costs, and enhance cash flow management. Financial institutions should consider offering this critical service as a foundational part of their business banking payment programs.

The future of ACH continues to be bright. With advancements in Same Day ACH, Al-driven automation, and Banking as a Service, organizations can streamline disbursements, improve risk management and create seamless payment experiences for customers and vendors. As ACH continues to evolve, financial institutions that invest in a well-structured origination program will gain a competitive edge in meeting market opportunities and needs.

To maximize the value of ACH origination, it is essential to have the right strategy, compliance framework, technology, and risk management program in place. Consider partnering with Nacha Consulting to build a tailored ACH origination program that aligns with your business needs and regulatory requirements. Our expertise in payment modernization, risk management, and operational best practices will help you unlock the full potential of ACH while ensuring compliance and efficiency.

Contact Nacha Consulting today for a free, 15-minute, no-obligation consultation. nacha.org/consulting

