Q: What databases are available in the Risk Management Portal?

A: The following databases are all accessible through the Risk Management Portal:

Third-Party Sender Registration Database

Third-Party Sender Registration serves as a means to help improve quality in the ACH Network. Registration promotes consistent customer due diligence among all ODFIs, and serves as a tool to support NACHA's continuing efforts to maintain ACH Network quality.

The Third-Party Sender Registration Rule requires all ODFIs to either register their Third-Party Sender (TPS) relationships or state that they do not have any. Registrations are completed through either an individual TPS upload or bulk TPS upload process. The individual upload process allows for quick registration, editing and deactivating of individual TPS relationships, while the bulk upload (available in XML, Excel, and CSV) allows for registering, editing, deactivating, and maintaining groups of TPS relationships.

NACHA provides templates that ODFIs can use to build their own internal systems to the Database specifications. The templates include a Word document outlining the specific fields for the Third-Party Sender Registration database and a description of those fields, along with a sample XML, Excel, and CSV file with the database fields included.

See more information later in these FAQs about determining whether you have Third-Party Senders.

Direct Access Registration Database

To mitigate the risks posed by Direct Access, which involves a separation of control and responsibility, it's critical that each ODFI register its status. Direct Access relationships may expose ODFIs to shortcomings, or even fraud, in the policies or practices of Originators, Third-Party Service Providers and Third-Party Senders. The ACH Network's focus on risk management has grown as transaction volumes and product complexity have increased; your registration provides valuable information about the breadth and depth of these financial relationships.

Every ODFI is required to register its status with NACHA by either acknowledging that it has no Direct Access Debit Participants or provide specific information about each Direct Access Debit Participant.

See information later in these FAQs about determining whether you have Direct Access Debit Participants.

ACH Contact Registry

NEW! An industry resource – the ACH Contact Registry - is being created for financial institutions to be able to more easily connect with other financial institutions about ACH operations, exceptions and risk management. In order for the ACH Contact Registry to be a valuable, Network-wide resource, all ODFIs and RDFIs in the ACH Network need to participate. The new rule enables the creation of this resource by requiring the registration of contact information by all ODFIs and RDFIs in the ACH Network:

- Beginning July 1, 2020 all financial institutions participating in the ACH Network will be required to register contact information with Nacha for personnel or departments responsible for ACH

operations and ACH fraud/risk management. Other optional contact categories will be available (wire, check, card, etc.).
- All FIs must register contact information by October 30, 2020

All financial institutions participating in the ACH Network will be required to register contact information with Nacha for personnel or departments responsible for ACH operations and fraud/risk management. The contact information will be available for other registered ACH participating financial institutions, Payments Associations, the ACH Operators, and Nacha for operational, fraud, and risk management issues in the ACH Network (e.g., proof of authorizations, ACH-related system outages, erroneous payments, duplicates, reversals, fraudulent payments, etc.). Contact information will be only for those parties own, internal use and limited to these purposes.

Terminated Originator Database (TOD)

NACHA's commitment to ensuring that the ACH Network maintains the highest level of safety and security for its participants includes working with the industry to employ a comprehensive Risk Management Strategy. A key component in that strategy is NACHA's Termination Originator Database (TOD) service – and as ODFIs and Third-Party Service Providers exchange information on terminated Originators or Third-Party Senders, they help to strengthen the Network.

As participants, ODFIs and Third Parties will be able to perform part of their due diligence for KYC ("Know Your Customer") by being able to add information on, investigate new and periodically verify Originators and Third-Party Senders.

Inclusion in TOD, after being terminated for cause, doesn't mean an Originator or Third-Party Sender is prohibited from working with another ODFI. However, it allows educated business decisions about new Originators or Third-Party Senders.

NACHA encourages ODFIs and Third Parties to use TOD in the following ways:

- To add information on terminated Originators and Third-Party Senders.
- To investigate new Originators and Third-Party Senders before onboarding.
- To periodically verify your current Originators and Third-Party Senders, ensuring they haven't been recently terminated by another ODFI.

Q. How do I know if I have a Third-Party Sender?

The Third-Party Sender Identification Tool helps financial institutions and their ACH customers understand their roles when an intermediary is involved in some aspect of ACH payment processing by asking a series questions that can help to identify whether a business is a Third-Party Sender.

"What is a Third-Party Sender?" Video brings high-level awareness regarding the importance and value that Third-Party Senders bring to the payments ecosystem and why properly identifying them helps to ensure a safe and reliable ACH network for all payment systems stakeholders while also continuing to allow for innovation in payments processing.
For educational distribution, Standard and Extended versions (in SD and HD formats) of the video are available for download on our Vimeo channel.

Simplified Scenarios of Third-Party Senders offers a few Third-Party Senders examples involving payroll and tuition processing, HOA dues and property management for vacation rentals.

Third-Party Sender Registration provides Rule information and details for ODFIs to register their Third-Party Sender customers.

Third-Party Sender ACH Operations Bulletin includes additional guidance and definition regarding Third-Party Senders and Other Payment Intermediaries.

Additional Third-Party Sender resources and education can be found on the NACHA eStore or by contacting your local Payments Association. Financial institutions are encouraged to obtain their own legal counsel regarding their obligations under the NACHA Operating Rules and other applicable legal requirements.

Q. How do I know if I have a Direct Access Debit Participant?

A. If you're not sure whether your ODFI maintains Direct Access Debit Participant relationships with Third-Parties and/or Originators, see our definitions and example scenarios, or your local Payments Association with questions. Remember to provide your financial institution's routing number in all email communication, since this helps us to identify you in our database.

Q: Who is eligible to use the Risk Management Portal?

A: Originating Depository Financial Institutions (ODFIs) must use the Risk Management Portal to register Third-Party Sender customers and Direct Access Debit Participants or to acknowledge the absence of those relationships. ODFIs and Receiving Depository Financial Institutions (RDFIs) may access and contribute to the Emergency Financial Institution Contact Database and Terminated Originator Database. Additionally, Third-Party Service Providers and Third-Party Senders may use the Portal to access and contribute to the Terminated Originator Database.

Q: What security is in place to protect access and data on the Risk Management Portal?

A: NACHA is committed to taking appropriate steps to secure the data collected and stored in the Risk Management Portal (Database). The Database is a hosted solution built with security and business continuity in mind, including physical security, encryption, user authorization and authentication processes, and auditing to verify satisfaction of privacy and security requirements. Authorized users must use a secure portal to access the Database, and data is encrypted while it is in transit to NACHA and remains encrypted while it is at rest in the solution. Moreover, compliance of the underlying cloud platform with key industry standards is certified by the cloud service provider.

Q: How many individuals from my organization may access the Risk Management Portal?

A: The Portal allows for one administrator from each organization and up to four additional users. The administrator will create an account within the Risk Management Portal and manage user's access.

Q: Do I need to register multiple times to access each database?

A: No. Each financial institution must register only once in the Risk Management Portal. All databases are available from a single login within the Risk Management Portal.

Q: My financial institution has multiple Routing and Transit Numbers (RTNs). Which one do we register? Do we need to register every single RTN?

A: Each financial institution will select their primary RTN at registration and this number will remain associated with the financial institution for all applications within the Risk Management Portal. NACHA is using a list of RTNs from Accuity, the official ABA registrar, to track all RTNs associated with each financial institution. Both the Third-Party Sender and Direct Access registration rules require associating specific RTNs to individual customers or relationships. Assigning the additional RTNs used by Third-Party Sender customers and Direct Access Debit Participants for these registrations can be completed within the Third-Party Sender and Direct Access registration databases.

Q: My Third-Party Sender customer originates for many originators and a different Company ID is used for each. Which Company ID do I use?

A: If multiple Company IDs are used for a single Third-Party Sender, only enter the Third-Party Sender once and enter one (1) of the associated Company IDs (at the ODFI's discretion). Do not enter any one Third-Party Sender more than once.

Only register the TPS Company ID of the Third-Party Sender and not the company names and IDs of every Originator. The NACHA Operating Rules do not require the Company ID for every Originator associated with the Third-Party Sender.

- Only register the TPS Company ID and TPS Name of the Third-Party Sender and not the company names and IDs of every originator. The *NACHA Operating Rules* do not require the Company ID and Company Name for every Originator associated with the Third-Party Sender.

Q: How will NACHA use the information about registered Third-Party Senders and Direct Access Debit Participants?

A: Registration information will not be disclosed to outside parties. NACHA will publish aggregate statistical information from the registry as we learn more about Third-Parties, Direct Access Debit Participants and their relationship to the ACH Network.