



Same Day ACH: Moving Payments Faster

\$100,000 Per-Transaction Limit Guidance **July 9, 2020**

On March 20, 2020, the dollar limit on large-dollar Same Day ACH Entries was raised from \$25,000 to \$100,000 per entry.

The limit on large-dollar transactions (those ACH Entries over \$100,000) applies to individual transactions; i.e., a single Same-Day ACH transaction can not be for more than \$100,000. 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 \$100,000 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 \$100,000 limit. For example, if a business has a loan payment of \$150,000 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 \$100,000 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.

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