

**ACH Risk Management 2023**

**Request for Comment/Request for Information**

***ACH Participant Survey***

***May 2, 2023***

**Comments Due by June 16, 2023 for RFC Topics**

Nacha is issuing for comment a set of proposals to amend the Nacha Rules related to ACH Risk Management. This Request for Comment (RFC) includes seven proposals related to ACH credit risk management and two proposals related to ACH debit risk management.

ACH credit risk management proposals:

* Commercially Reasonable Fraud Detection.
* RDFI credit transaction monitoring.
* Expand use of Return Reason Code R17.
* Expand use of reversals for fraud recovery.
* Additional exemption from Funds Availability Requirement.
* Standard Company Entry Descriptions.
* Standard use of the Individual Name Field.

ACH debit risk management proposals:

* Timing of Written Statement of Unauthorized Debit.
* RDFI must promptly return unauthorized debits.

Questions are provided to explore the impact of these proposals on ACH Network participants.

In addition, Nacha requests information in the form of a Request for Information (RFI) from industry participants on ACH risk management topics such as ACH credit return rate thresholds, “Third-Party Receivers”, risk-based approaches to early funds availability, and NOC for SEC Code/Account Type mismatch.

Both the RFC and the RFI surveys should be completed online at <https://www.nacha.org/rules/proposed>. Comments on the RFC topics are requested by **Friday, June 16, 2023**. Information on the RFI topics is requested by **June 30, 2023**.

For convenience, the survey questions are also provided within this document to assist respondents in gathering information from within their organizations. Please provide responses to the respondent information section at the end of the survey. If responding to the online survey, this information will be gathered at the start of the survey.

**Nacha Staff Contacts**

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**Section 1 - Request For Comment: Overall Proposal**

|  |  |  |
| --- | --- | --- |
| 1. Overall, does your organization agree that the proposed Rules advance the objectives of the new ACH Risk Management Framework? |  | Yes |
|  | Yes, with exception(s) |
|  | No |
|  | Don’t know |
| Please explain why or why not, and if you answered “Yes, with exception(s),” please identify the exception(s): | | |

**Section 2 – RFC Topics**

**Proposal #1 - Commercially Reasonable Fraud Detection**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization conduct commercially reasonable fraud detection with respect to your ACH payments? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If you answered Yes, are you able to estimate the volume and value of fraudulent ACH payments? |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, please describe or explain: | | |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree with the proposal to expand the application of commercially reasonable fraud detection? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Should commercially reasonable fraud detection apply to each non-Consumer Originator, ODFI, Third Party Service Provider and Third-Party Sender participant in the ACH Network? |  | Yes |
|  | No |
|  | Don’t know |
| If no, are there specific participants to which such a requirement should not apply? | | |

|  |  |  |
| --- | --- | --- |
| 1. Should this requirement apply to all ACH Entries? |  | Yes |
|  | No |
|  | Don’t know |
| If no, are there specific types of Entries that should be exempt? | | |

|  |  |  |
| --- | --- | --- |
| 1. Should this requirement for commercially reasonable fraud detection become effective in phases based on ACH transaction volume, similar to the Supplementing Data Security Requirements rule? |  | Yes |
|  | No |
|  | Don’t know |

|  |
| --- |
| 1. For ODFIs and TPSs, how would you educate and assist your clients in implementing this requirement? (Leave blank if not an ODFI or TPS.) |

|  |  |  |
| --- | --- | --- |
| 1. While not part of the proposal, should ACH participants be required to report detected fraudulent ACH Entries? |  | Yes |
|  | No |
|  | Don’t know |
| If you answered Yes, to whom should they report? (e.g., Nacha, ACH Operator, counterparty FI, industry consortium, etc.) | | |

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| --- |
| 1. Please provide any other comments on Proposal #1. |

**Proposal #2 - RDFI Credit Transaction Monitoring**

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you currently monitor ACH credits received? (Do not answer if not an RDFI.) |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Could incidences of credit-push fraud be reduced if all RDFIs monitor ACH credits received? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposal to require RDFIs to conduct commercially reasonable fraud detection monitoring on received ACH credits? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, if your organization determined an ACH credit was fraudulent, how would you act on that entry (check any that apply; do not answer if not an RDFI)? |  | Return the entry |
|  | Contact the ODFI |
|  | Contact the account-holder |
|  | Other |
|  | No action |
|  | Don’t know |
| If other, please describe: | | |

|  |  |  |
| --- | --- | --- |
| 1. Are current methods and tools sufficient for RDFIs to communicate with ODFIs about suspicious transactions? |  | Yes |
|  | No |
|  | Don’t know |
| If no, please describe desired improvements: | | |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, does your institution have an established communication channel between compliance monitoring (e.g., AML) areas and ACH operations/product teams? (Do not answer if not an RDFI.) |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. While not part of the proposal, should RDFIs be required to report detected fraudulent ACH credits? |  | Yes |
|  | No |
|  | Don’t know |
| If you answered Yes, to whom should they report? (e.g., Nacha, ACH Operator, counterparty FI, industry consortium, etc.) | | |

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| --- |
| 1. Please provide any other comments on Proposal #2. |

**Proposal #3 - Expand Use of Return Reason Code R17**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposal to expand the use of Return Reason Code R17 to allow for returns for entries initiated under questionable or potentially fraudulent circumstances? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you already use R17 in this manner? (Do not answer if not an RDFI.) |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree with the proposal to continue to require the descriptor QUESTIONABLE be used to distinguish returns for entries initiated under questionable or potentially fraudulent circumstances from those with field errors? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI/Third-Party Sender/Originator, does your organization have procedures to identify and act on received R17 QUESTIONABLE returns today? (Do not answer if not an ODFI/TPS/Originator.) |  | Yes |
|  | No |
|  | Don’t know |

|  |
| --- |
| 1. Please provide any other comments on Proposal #3. |

**Proposal #4 - Expand Use of Reversals for Fraud Recovery**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think reversals should be available as a tool to assist in fraud recovery? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree that a credit entry transmitted by an Originator as a result of a fraud scheme or fraud event should be included as an allowable reason for a reversal? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI do you ever use reversals to assist with fraud recovery? (Do not answer if not an ODFI.) |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If yes, is it generally successful for fraud recovery? (Do not answer if not an ODFI.) |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree that if an Originator transmits a reversal for an entry that was a result of a fraud scheme or fraud event that the transaction should be identifiable as such? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If you agree that these reversals should be identifiable, do you agree with the Company Entry Description of REVERSALFR for such a reversal? |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain why not and any preferred alternatives: | | |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI do you ever request an RDFI to return an entry (using R06 “Returned per ODFI’s Request”) to assist with fraud recovery? (Do not answer if not an ODFI.) |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If yes, is it generally successful for fraud recovery? (Do not answer if not an ODFI.) |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, are there times you receive requests to return entries to assist with fraud recovery? (Do not answer if not an RDFI.) |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with expanding ODFI Request for Return to encompass “any reason”? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree that the RDFI should promptly respond to the ODFI’s request for a return, regardless of its decision to comply or not comply with the request? |  | Yes |
|  | No |
|  | Don’t know |

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| --- |
| 1. Please provide any other comments on Proposal #4. |

**Proposal #5 - Additional Exemption from Funds Availability Requirements**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree that RDFIs should have an additional exemption from funds availability requirements for ACH credit entries that may be authorized, but created as a result of a fraud scheme or fraud event? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, does your organization ever invoke the current provision of the rules to delay funds availability for ACH credits that you believe to be the result of a fraud scheme or fraud event? (Do not answer if not an RDFI.) |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If you answered yes to the previous question, does your organization utilize the ACH Contact Registry to obtain contact information to notify the ODFI if delaying funds availability? (Do not answer if not an RDFI.) |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

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| 1. Please provide any other comments on Proposal #5. |

**Proposal #6 - Standard Company Entry Descriptions**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think that use of defined descriptors in the Company Entry Description aids in risk management? |  | Yes |
|  | No |
|  | Don’t know |

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| --- | --- | --- |
| 1. Do you agree with the proposal to require the use of PAYROLL in batches of PPD credits for payment of wages, salaries, or similar types of compensation? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree with the proposal to require the use of PURCHASE when a batch contains debits used for e-commerce purchases? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. For this purpose, do you agree that an e-commerce purchase is a consumer debit authorized online for the purchase of goods or services? |  | Yes |
|  | No |
|  | Don’t know |

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| --- | --- | --- |
| 1. To what extent do you think ACH participants are currently using ACH payments for e-commerce purchases? |  | Significant amount |
|  | Moderate amount |
|  | Small amount |
|  | Not at all |
|  | Don’t know |
| If you answered Significant or Moderate, please provide a volume estimate. | | |

|  |  |  |
| --- | --- | --- |
| 1. Do you think any such use will increase or decrease in the future? |  | Increase significantly |
|  | Increase somewhat |
|  | No change |
|  | Decrease somewhat |
|  | Decrease significantly |
|  | Don’t know/no opinion |
| Please explain why or why not: | | |

|  |  |  |
| --- | --- | --- |
| 1. For e-commerce purchases, are there available metrics on current use and/or transaction quality? (e.g., return rates; disputes) |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, please provide details: | | |

|  |  |  |
| --- | --- | --- |
| 1. For e-commerce purchases, are there other formatting or rule changes that would improve the quality of these transactions or improve risk management? (e.g., new SEC Code; merchant information; industry code; product information; return rights or reasons) |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, please describe: | | |

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| --- |
| 1. Please provide any other comments on Proposal #6. |

**Proposal #7 - Standard Use of Individual Name Field**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think that standardizing the format of Receivers’ names will aid in risk management? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposed format for the Individual Name Field for consumers’ names? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. How frequently does your organization process transactions with multiple names in the Individual Name Field with different last names? |  | Never |
|  | Occasionally |
|  | Frequently |
|  | Don’t Know |

|  |  |  |
| --- | --- | --- |
| 1. Should the contents of the Individual Name Field be required to be all capitalized letters? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, would your organization use the contents of the Individual Name field in transaction monitoring? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Should this Individual Name field requirement become effective in phases based on volume, similar to the Supplementing Data Security Requirements rule? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Should this Individual Name field requirement become effective on a “go-forward basis,” such that it applies only to newly authorized entries? |  | Yes |
|  | No |
|  | Don’t know |

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| --- |
| 1. Please provide any other comments on Proposal #7. |

**Proposal #8 – Timing of Written Statement of Unauthorized Debits**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposal to allow a Written Statement of Unauthorized Debit to be obtained prior to the Settlement Date, but after the presentment, of the Entry the Receiver is seeking recredit for? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, are there times when your institution identifies a potentially fraudulent debit prior to the entry posting to your Receiver’s account? |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, are there times when your account holder identifies a potentially fraudulent debit prior to the entry posting to your Receiver’s account? |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |

|  |
| --- |
| 1. Please provide any other comments on Proposal #8. |

**Proposal #9 - RDFI Must Promptly Return Unauthorized Debits**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposed change that upon receipt of a completed Written Statement of Unauthorized Debit (WSUD) the RDFI must promptly return the unauthorized debit entry for which the Receiver’s account has been recredited? |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI, are there times when you receive returns significantly later than the date of the WSUD? (Do not answer if not an ODFI.) |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you ever delay sending a return after receiving a completed WSUD and recrediting the Receiver? (Do not answer if not an RDFI.) |  | Yes |
|  | No |
|  | Don’t know |
| If yes, why? | | |

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| --- | --- | --- |
| 1. Do you agree with the proposed guidance that a prompt return is one that is transmitted as soon as reasonably possible by staff that performs those functions, typically within one to two banking days? |  | Yes |
|  | No |
|  | Don’t know |

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| --- |
| 1. Please provide any other comments on Proposal #9. |

**Section 3 – Anticipated Impacts**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| 1. On a scale of 1-5 (with “1” representing no impact, and “5” indicating extensive impact), please indicate the estimated impact of the proposed changes to your organization in various areas: | | | | | | |
|  | 1 =  No impact | 2 = Minimal impact | 3 = Moderate impact | 4 =  Large impact | 5 = Extensive impact | Don’t know |
| **Commercially Reasonable Fraud Detection** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **RDFI Credit Transaction Monitoring** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Expand Use of Return Reason Code R17** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Expand Use of Reversals for Fraud Recovery** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Additional Exemption from Funds Availability Requirement** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Standard Company Entry Descriptions** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Standard Use of Individual Name Field** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Timing of Written Statement of Unauthorized Debit** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **RDFI Must Promptly Return Unauthorized Debits** | | | | | | |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| For any “others” identified in any section of this questions, please identify: | | | | | | |

|  |  |  |  |
| --- | --- | --- | --- |
| 1. For each of the proposals, do you think that the estimated impacts are manageable and proportionate to the anticipated benefits? | Yes | No | Don’t know |
| Commercially Reasonable Fraud Detection |  |  |  |
| RDFI Credit Transaction Monitoring |  |  |  |
| Expand Use of Return Reason Code R17 |  |  |  |
| Expand Use of Reversals |  |  |  |
| Additional Exemption from Funds Availability Requirement |  |  |  |
| Standard Company Entry Descriptions |  |  |  |
| Standardized Use of Individual Name |  |  |  |
| Timing of Written Statement of Unauthorized Debit |  |  |  |
| RDFI must promptly return unauthorized debits |  |  |  |

**Section 4 - Proposed Effective Dates and Other**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. Does your organization support the proposed effective date of **March 15, 2024**? For these proposals: | Yes | No, prefer earlier | No, prefer later | Don’t know |
| Expand Use of Return Reason Code R17 |  |  |  |  |
| Additional Exemption from Funds Availability Requirement |  |  |  |  |
| Timing of Written Statement of Unauthorized Debit |  |  |  |  |
| RDFI must promptly return unauthorized debits |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. Does your organization support the proposed effective date of **September 20, 2024** for these proposals: | Yes | No, prefer earlier | No, prefer later | Don’t know |
| Commercially Reasonable Fraud Detection |  |  |  |  |
| RDFI Credit Transaction Monitoring |  |  |  |  |
| Expand Use of Reversals for fraud recovery |  |  |  |  |
| Standard Company Entry Descriptions |  |  |  |  |
| Standard use of Individual Name Field |  |  |  |  |

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| --- |
| 1. If you think that any portions of this proposal should have a different effective date, please identify and explain: |
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| --- |
| 1. Do you have any other comments or suggestions on this proposal not already provided? |

**Section 5 – RFI Topics**

**RFI Topic #1 – ACH Credit Return Threshold**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think the Nacha Operating Rules should establish a return threshold for ACH credits, similar to the existing administrative threshold of 3.0% for ACH debits? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |
| --- | --- | --- |
| 1. Are there other return reasons for credits that should be considered for return threshold monitoring? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

**RFI Topic #2 - “Third-Party Receivers”**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think that the Nacha Operating Rules should define and apply rules to a Third-Party Receiver as an ACH participant type? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree with the suggested description of a Third-Party Receiver as a new type of Third-Party Service Provider and its described activities? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |
| --- | --- | --- |
| 1. Should the rules apply requirements for Third-Party Receiver relationships? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |  |
| --- | --- | --- | --- |
| 1. If rules obligations for Third-Party Receivers should be considered, should the following specifics be included: | Yes | No | Don’t know |
| Funds availability requirements |  |  |  |
| Obligation to accept consumer WSUDs |  |  |  |
| Rules compliance audits |  |  |  |
| ACH risk assessments |  |  |  |
| ACH data security requirements |  |  |  |
| Please provide any additional requirements for consideration: | | | |

**RFI Topic #3 – Risk-Based Approach to Early Funds Availability**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think that a risk-based approach to early funds availability offerings may make these services less attractive to potential fraudsters? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |
| --- | --- | --- |
| 1. Should the Nacha Operating Rules incorporate a risk-based approach to early funds availability for RDFIs that provide it? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |  |
| --- | --- | --- | --- |
| 1. The description of this topic includes several risk factors for RDFI consideration. Does your organization believe that these are appropriate factors? | Yes | No | Don’t know |
| Account type |  |  |  |
| Relationship longevity |  |  |  |
| Dollar limits |  |  |  |
| Appropriateness of transaction type |  |  |  |
| Volume of transactions |  |  |  |
| Velocity of transactions |  |  |  |
| Risk of reversal |  |  |  |
| Risk of non-settlement |  |  |  |
| Please provide any additional requirements for consideration: | | | |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, would your organization be able to identify and analyze the listed risk factors? |  | Yes |
|  | Yes, with exception(s) |
|  | No |
|  | Don’t know |
| If you answered “Yes, with exception(s),” please identify the exception(s): | | |

|  |  |  |
| --- | --- | --- |
| 1. Do you think that a risk-based approach to early funds availability should encompass the establishment of policies, procedures and systems to assess risk, enforce eligibility/ineligibility, and report anomalies and violations? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, does your organization currently utilize any factors to determine the provision of early funds availability of ACH credits? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: | | |

**RFI Topic #4 – NOC for SEC Code/Account Type Mismatch**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization think that a new “SEC Code/Account Type” mismatch Change Code (ex. C10) be useful in correcting errors and in alerting ODFIs and Originators to potential cases of fraud? |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: | | |

**Section 6 – RFI Topics General Information**

|  |  |  |  |
| --- | --- | --- | --- |
| 1. For each of the RFI topics, do you think that the topic aligns with the Risk Management Framework? | Yes | No | Don’t know |
| Return Threshold for ACH Credits |  |  |  |
| “Third-Party Receivers” |  |  |  |
| Risk-Based Approach to Early Funds Availability |  |  |  |
| NOC for SEC Code/Account Type Mismatch |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| 1. For each of the RFI topics, do you think that the topic should be addressed in the Nacha Operating Rules? | Yes | No | Don’t know |
| Return Threshold for ACH Credits |  |  |  |
| “Third-Party Receivers” |  |  |  |
| Risk-Based Approach to Early Funds Availability |  |  |  |
| NOC for SEC Code/Account Type Mismatch |  |  |  |

**Section 7 – General Information**

|  |
| --- |
| 1. Do you have any other comments or suggestions on ACH Network Risk Management not already provided? |

Respondent Information

***All Respondents***

|  |  |  |  |
| --- | --- | --- | --- |
| Name |  | | |
| Title |  | | |
| Organization |  | | |
| City, State |  | | |
| Phone: |  | Email: |  |

|  |  |  |  |
| --- | --- | --- | --- |
| Please indicate your organization’s role(s) in the ACH Network: | | | |
|  | ODFI |  | Payments Association |
|  | RDFI |  | Nacha Direct FI Member |
|  | ACH Operator |  | Government |
|  | Non-FI end-user |  | Software/Technology provider |
|  | Industry association |  | Third Party Service Provider |
|  |  |  |  |
|  | Other: | | |

|  |  |  |  |
| --- | --- | --- | --- |
| What areas of your organization provided input for the responses to this survey? | | | |
|  | Operations |  | Retail/online banking |
|  | Product management |  | Customer service |
|  | Legal |  | Compliance |
|  | Information Technology/software |  | Wholesale/corporate banking/treasury mgt |
|  | Executive/strategy |  |  |
|  | Other: | | |

***Financial Institution Respondents***

|  |  |  |
| --- | --- | --- |
| Asset Size |  | less than $500 million |
|  |  | $500 million - $5 billion |
|  |  | $5 billion - $25 billion |
|  |  | $25 billion - $100 billion |
|  |  | Greater than $100 billion |