

**Same Day ACH and Faster ACH Topics**

**Request for Comment/Request for Information**

***ACH Participant Survey***

***October 8, 2024***

**Comments Due by Friday, December 13, 2024**

Nacha requests feedback on proposals to: 1) add a fourth daily Same Day ACH processing window aligned with the close of the business day in the Pacific Time Zone; and 2) accelerate funds availability for certain non-Same Day ACH credits. Questions are provided to explore the impact of these proposals on ACH Network participants.

In addition, Nacha is seeking information in the form of a Request for Information (RFI) from industry participants on whether the ACH Network still needs 2-day ACH credits, and how to encourage greater use of same-day returns.

Both the RFC and the RFI surveys should be completed online at <https://www.nacha.org/rules/proposed>. Comments are due by **Friday, December 13, 2024**.

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 Topics**

**Proposal #1 - Fourth Same Day ACH Window**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support adding a fourth Same Day ACH processing window on Monday-Friday aligned with the close of the business day in the Pacific Time Zone?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain why or why not: |

|  |  |  |
| --- | --- | --- |
| 1. Regardless of your answer to question 1, if a new Same Say ACH window goes into effect, does your organization agree with the proposed processing times?
 |  | Yes |
|  | Yes, with change(s) |
|  | No |
|  | Don’t know |
| If you answered “Yes, with change(s),” please explain: |

|  |  |  |
| --- | --- | --- |
| 1. What do you anticipate are the use cases for an additional Same Day ACH window? (Check all that apply.)
 |  | Payroll |
|  | Account-to-account transfers |
|  | Bill payments |
|  | Reimbursements and refunds |
|  | Funding transactions |
|  | Invoice payments |
|  | Cash concentration |
|  | Merchant settlement |
|  | Tax payments |
|  | Micro-Entries |
|  | Returns |
|  | Outage and missed deadline recovery |
|  | Other |
|  | Don’t know |
| If other, please describe: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support the requirement for RDFIs to make funds available on Friday nights in advance of settlement?
 |  | Yes, for all credits |
|  | Yes, for certain credits |
|  | No |
|  | Don’t know |
| If you answered “Yes, for certain credits” in question 4, please select the response(s) that best describes which credits. |  | Only for credits to business accounts |
|  | Only for credits to consumer accounts |
|  | Only for PPD credits |
|  | Only for PPD credits with the description of “PAYROLL” |
|  | Up to a certain dollar limit |
|  | Other |
| If you selected “Up to a certain dollar limit,” what do you think the dollar limit should be? |
| If you selected “Other,” please explain: |

RDFIs Only

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you currently provide early funds availability for any ACH credits?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Does making funds available in advance of settlement create additional risk?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If you answered “Yes” to question 6, do you think the risks can be reasonably managed?
 |  | Yes |
|  | No |
|  | Don’t know |
| If you answered “No,” please explain: |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, please estimate the amount of effort it will take to meet the end-of-processing day funds availability requirement for Same Day ACH credits received in a new window.
 |  | Significant amount |
|  | Moderate amount |
|  | Minimal amount |
|  | None |
|  | Don’t know |

All respondents may answer

|  |  |  |
| --- | --- | --- |
| 1. Do you think that RDFIs and business Receivers will handle Same Day ACH debits differently in this fourth window?
 |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, please describe or explain: |

|  |  |  |
| --- | --- | --- |
| 1. Will you organization be able to accurately account for Same Day ACH payments that occur on today’s calendar date but that settle on tomorrow’s Federal Reserve accounting date?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Would your organization support adjustments to the timing of the existing three Same Day ACH windows to more evenly space them throughout the day?
 |  | Yes |
|  | No |
|  | Don’t know |
| If yes, please provide any specific suggestions: |

|  |  |  |
| --- | --- | --- |
| 1. Would your organization support changing the funds availability requirement for the current, third Same Day ACH window to differentiate it from the proposed new window?
 |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, what should that funds availability requirement be? |

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

**Proposal #2 – Accelerated Funds Availability for non-Same Day ACH credits**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support requiring funds availability by 9:00 am local time on settlement day for all non-Same Day ACH credits?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you currently make funds available by 9:00 am local time on settlement day for all non-Same Day ACH credits?
 |  | Yes |
|  | No |
|  | Don’t know |
| If you answered “No,” please explain: |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, if you answered “No” to question 15, what would be the level of effort required to do so?
 |  | Significant effort |
|  | Moderate effort |
|  | Minimal effort |
|  | None |
|  | Don’t know |
| If you answered Significant or Moderate, please explain. |

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

**Section 2 – Impacts and Effective Date**

|  |
| --- |
| 1. Please indicate the estimated impact of the proposed changes to your organization in various areas:
 |
|  | No impact | Minimal impact | Moderate impact | Large impact | Extensive impact | Don’t know |
| **Fourth Same Day ACH Window** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Risk management systems |  |  |  |  |  |  |
| Deposit and posting systems |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Accelerated Funds Availability for non-Same Day ACH Credits** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Risk management systems |  |  |  |  |  |  |
| Deposit and posting systems |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| For any “others” identified in any section of this question, 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 |
| Fourth Same Day ACH Window |  |  |  |
| Accelerated Funds Availability for non-Same Day ACH Credits |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. Does your organization support the proposed effective dates?
 | Yes | No, prefer earlier | No, prefer later | Don’t know |
| Accelerated Funds Availability for non-Same Day ACH Credits – **September 18, 2025** |  |  |  |  |
| Fourth Same Day ACH Window - **September 19, 2026** |  |  |  |  |
| If you answered “No, earlier” or “No, later” for either proposal, please identify your preferred effective date and for which proposal: |

**Section 3 – RFI Topics**

**RFI Topic #1 – 2-Day ACH Credits**

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI or Originator, do you use 2-day ACH credits?
 |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, for what use cases (e.g., payroll, invoice payments, etc.)? |
| If Yes, what percentage of your credit origination goes as 2-day credits?  |  | Less than 25% |
|  | Less than 50% |
|  | More than 50% |
|  | More than 75% |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Does the ACH Network still need 2-day ACH credits?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Should the Nacha Rules be changed to require ACH credits to settle in either 1-day or on the same day?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: |

|  |
| --- |
| 1. What are the potential benefits of such a change?
 |

|  |
| --- |
| 1. What are the potential impacts of such a change?
 |

**RFI Topic #2 – Same-day Returns**

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you currently return any entries using the same-day windows?
 |  | Yes |
|  | No |
|  | Don’t know |
| If yes, what percentage of your returns go same-day?  |  | Less than 25% |
|  | Less than 50% |
|  | More than 50% |
|  | More than 75% |
|  | Don’t know |
| If no, why not?  |

|  |
| --- |
| 1. How can RDFIs be encouraged to use same-day returns?
 |

**Section 4 – RFI Topics General Information**

|  |  |  |  |
| --- | --- | --- | --- |
| 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 |
| Limiting ACH credits to 1-day and same-day settlement |  |  |  |
| Same-day returns |  |  |  |

Section 5 - 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 |  | Third Party Service Provider |
|  | Industry association |  | Software/Technology 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 |