

**International ACH Transactions (IATs) and Related Topics**

**Request for Comment/Request for Information**

***ACH Participant Survey***

***March 31, 2025***

**Comments Due by May 30, 2025**

Nacha is issuing for comment a set of proposals to amend the Nacha Operating Rules related to International ACH Entries. This Request for Comment proposes to:

* revise and simplify the IAT definition,
* make IATs eligible for Same Day ACH,
* modify the IAT format to enable the optional inclusion of Date of Birth,
* recognize non-traditional foreign financial agencies as parties to an IAT Entry,
* require financial institutions to register an IAT contact in the ACH Contact Registry,
* define valid characters for all ACH records,
* define a new return reason code for Entries returned as a result of an OFAC instruction, and
* confirm the suggested IAT status of e-commerce marketplace scenarios.

Questions are provided to explore the impact of these proposals on ACH Network participants. Comments are due by **Friday, May 30, 2025**.

In addition, this survey requests information from industry participants on IAT topics such as additional addenda records, additional indicators, variations of data quality, and communication of IAT-related changes.

The survey should be completed online at <https://www.nacha.org/rules/proposed> by **May 30, 2025**. 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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**Request For Comment: Section 1 – Overall Proposal and Usage**

|  |  |  |
| --- | --- | --- |
| 1. Overall, does your organization support making improvements and enhancements to International ACH Transactions (IATs)?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do the proposals taken together offer sufficient value to improve the use of IATs?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |
| --- |
| 1. What is your current experience with IAT entries?
 |
|  | Regularly | Occasionally | Never | Don’t know | N/A |
| Originate (Initiate) |  |  |  |  |  |
| Receive |  |  |  |  |  |
| If you originate IAT entries, please provide approximately how many each month: |
| If you receive IAT entries, please provide approximately how many each month: |

**Section 2 – Definition of IAT Entries**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposed new definition of IAT Entry?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Would the proposed new definition of IAT Entry make it easier to understand when the IAT Standard Entry Class Code should be used?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Would the proposed new definition of IAT Entry cause your organization to reclassify any current entries?
 |  | Yes |
|  | No |
|  | Don’t know |
| If Yes, please explain: |

**Section 3 – Eligibility of IAT Entries for Same-Day Processing**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support the domestic leg of an international payment (i.e., the IAT Entry) being eligible for Same Day ACH?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization have use cases that would benefit from same-day IAT Entry settlement (domestic leg only)?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As a Receiving Depository Financial Institution (RDFI), would your organization be able to meet the funds availability requirements for same-day IATs (i.e., screen IAT credits in time to make funds available)?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, would the aimed improvements in data quality in this Request for Information be necessary to meet same-day funds availability requirements?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |
| --- |
| 1. Do you have any other comments on this proposal?
 |
|
|

**Section 4 – Date of Birth Field for IAT Entries**

*Questions for* ***Parties Involved in Sending IAT Entries***

|  |  |  |
| --- | --- | --- |
| 1. If your organization sends IAT Entries (as an Originator, Originating Depository Financial Institution (ODFI), or Gateway), do you receive inquiries from RDFIs requesting dates of birth to aid in resolving IAT exceptions?
 |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |
| If yes, please describe the level of effort currently required to fulfill this type of request. |  | Minimal Effort |
|  | Moderate Effort |
|  | Extensive Effort |
|  | Often it is not possible |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an Originator (initiator) of IATs, would your organization be able to obtain a date of birth for inclusion in a consumer IAT?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an Originator (initiator) of IATs, would your organization make use of the ability to include date of birth in a consumer IAT?
 |  | Yes |
|  | Yes, when it’s available |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI, would your organization require Originators to include date of birth in a consumer IAT?
 |  | Yes |
|  | Yes, when it’s available |
|  | No |
|  | Don’t know |

*Questions for* ***Receiving Depository Financial Institutions***

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, do you request dates of birth from ODFIs/Originators to aid in reviewing parties to IAT entries?
 |  | Yes, often |
|  | Yes, sometimes |
|  | No |
|  | Don’t know |
| If yes, please describe the level of effort currently required to make the request and resolve IAT exceptions. |  | Minimal Effort |
|  | Moderate Effort |
|  | Extensive Effort |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, if you received the date of birth for natural persons within IAT Entries, could you more easily resolve IAT exceptions?
 |  | Yes |
|  | No |
|  | Don’t know |

*Questions for* ***All Respondents***

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support modifying the IAT format to accommodate the optional inclusion of the date of birth for a natural person that is a party to the payment transaction?
 |  | Yes |
|  | No |
|  | Don’t know |
| 1. Regardless of your answer to Question 17, if the format is modified, do you agree that the currently-reserved spaces within the 3rd IAT Addenda Record (for Originators) and 7th IAT Addenda Record (for Receivers) and available space in the Payment Related Information field of the Remittance Addenda Record (for ultimate beneficiary/payor) should be re-purposed or used to carry date of birth?
 |  | Yes |
| No |
| Don’t know |
| 1. Regardless of your answer to Question 17, if the format is modified, do you agree that the date of birth format should be aligned with the ISO date format (YYYY-MM-DD)?
 |  | Yes |
| No |
| Don’t know |
| If there is a better, alternative location or method, please explain. |

|  |  |  |
| --- | --- | --- |
| 1. Regardless of your answers to Questions 17-19, do you agree that the inclusion of date of birth as described should be optional?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain:  |

|  |
| --- |
| 1. Do you have any other comments on this proposal?
 |
|
|

**Section 5 – Non-Bank Financial Agencies in IAT Entries**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree that the descriptions for various fields identifying the Receiving DFI and Originating DFI (e.g., DFI name, DFI identification, branch country code) in an IAT Entry should be expanded to identify a non-traditional (i.e., non-bank) foreign financial agency as the holder of the sender’s or receiver’s account?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |
| If your organization already transmits IAT entries to or receives IAT entries from non-bank foreign financial agencies, please describe how frequently it occurs?  |

|  |  |  |
| --- | --- | --- |
| 1. Is it sufficient to identify the numbering scheme used for these non-bank identification numbers simply as “other”?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |
| --- |
| 1. Do you have any other comments on this proposal?
 |
|
|

**Section 6 – Registration of IAT Contacts**

*Questions for Financial Institutions*

|  |  |  |
| --- | --- | --- |
| 1. Would having a designated contact for IAT inquiries available in the ACH Contact Registry be helpful with reviewing and posting IAT entries?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. The ACH Contact Registry currently includes IAT contacts entered on a voluntary basis. Has your institution registered an IAT contact?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. The ACH Contact Registry currently includes IAT contacts entered on a voluntary basis. Has your institution reached out to another institution’s IAT contact?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Do you agree that every Participating DFI should be required to register a contact for IAT entries in the ACH Contact Registry?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |
| --- |
| 1. Do you have any other comments on this proposal?
 |
|
|

**Section 7 – Valid Characters for ACH Records**

|  |
| --- |
| 1. If your organization has experienced a file rejection or processing interruption due to invalid characters in ACH records, please explain how it was handled:
 |

|  |  |  |
| --- | --- | --- |
| 1. Would having the valid characters for ACH records more clearly defined be beneficial to the industry?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support listing the specific valid characters as an Appendix to the Nacha Operating Guidelines?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support the inclusion of the current “basic” characters shown in Table One of the RFC as defined Valid Characters?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support the inclusion of the suggested extended characters shown in Table Two of the RFC as defined Valid Characters?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization have programs or systems that currently use or would benefit from use of the suggested extended characters shown in Table Two of the RFC?
 |  | Yes, we use now |
|  | Yes, but need non-ACH system updates  |
|  | No |
|  | Don’t know |

|  |
| --- |
| 1. Do you have any other comments on this proposal?
 |
|
|

**Section 8 – New Return Reason Code for Entry Returned Per Office of Foreign Asset Control (OFAC) Instruction**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization generally agree with the proposal to better differentiate entries returned per OFAC instructions from those returned due a receiving account that is frozen due to receiving financial institution or legal action?
 |  | Yes |
|  | No |
|  | Don’t know |
| If no, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposal to create a new Return Reason Code for use when OFAC has directed a receiving financial institution to return an ACH entry?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposal to utilize **R90** as the new Return Reason Code for use when OFAC has directed a receiving financial institution to return an ACH entry?
 |  | Yes |
|  | No |
|  | Don’t know |

|  |  |  |
| --- | --- | --- |
| 1. If you answered No to either Question 39 or Question 40, would you prefer one of these alternatives?
 |  | Repurposing of an existing Return Reason Code (please provide a suggested code below). |
|  | A new Return Reason Code in a different series. |
|  | Other |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization agree with the proposed time frame for the new Return Reason Code R90 (within 2 banking days of OFAC instruction)?
 |  | Yes |
|  | No |
|  | Don’t know |

*Questions for* ***Receiving Depository Financial Institutions***

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, does your organization utilize R16 to return entries as instructed by OFAC?
 |  | Yes |
|  | No |
|  | Don’t know |
| If yes, please provide estimated number of returns on an annual basis: |

|  |  |  |
| --- | --- | --- |
| 1. If you answered yes to Question 43, what type(s) of entries has your organization returned per OFAC instruction?
 |  | IAT |
|  | Domestic |
|  | Both IAT and domestic |
|  | Don’t know |

|  |
| --- |
| 1. Do you have any other comments on this proposal?
 |
|
|

**Section 9 - 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 |
| **Definition of IAT Entries** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Eligibility of IAT Entries for Same-Day Processing** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Date of Birth Field for IAT Entries** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Non-Bank Financial Agencies in IAT Entries** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Registration of IAT Contacts** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **Valid Characters in ACH Records** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |
| **New Return Reason Code for Entry Returned Per OFAC Instruction** |
| Systems and software |  |  |  |  |  |  |
| Staffing resources and training |  |  |  |  |  |  |
| ACH operations |  |  |  |  |  |  |
| 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 |
| Definition of IAT Entries |  |  |  |
| Eligibility of IAT Entries for Same-Day Processing |  |  |  |
| Date of Birth Field for IAT Entries |  |  |  |
| Non-Bank Financial Agencies in IAT Entries |  |  |  |
| Registration of IAT Contacts  |  |  |  |
| Valid Characters for ACH Records |  |  |  |
| New Return Reason Code for Entry Returned Per OFAC Instruction |  |  |  |

**Section 10 - Proposed Effective Date and Other**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. Does your organization support the proposed effective date of **September 18, 2026**, for these proposals:
 | Yes | No, prefer earlier | No, prefer later | Don’t know |
| Definition of IAT |  |  |  |  |
| Registration of IAT Contacts |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 1. Does your organization support the proposed effective date of **March 19, 2027**, for these proposals:
 | Yes | No, prefer earlier | No, prefer later | Don’t know |
| Eligibility of IAT Entries for Same-Day Processing |  |  |  |  |
| Date of Birth Field for IAT Entries |  |  |  |  |
| Non-Bank Financial Agencies in IAT Entries |  |  |  |  |
| Valid Characters for ACH Records |  |  |  |  |
| New Return Reason Code for Entry Returned Per OFAC Instruction |  |  |  |  |

|  |
| --- |
| 1. If you think that any portions of this proposal should have a different effective date, please identify and explain:
 |
|
|

|  |
| --- |
| 1. Do you have any other comments or suggestions on this proposal not already provided?
 |
|
|

**Section 11 – Confirmation of IAT ecommerce Marketplace Scenarios**

|  |
| --- |
| 1. Please refer to the ecommerce marketplace scenarios detailed in the RFC materials and indicate for each whether you believe the scenario should be considered an IAT Entry or not.
 |
| Please check here if you agree with ALL of the proposed scenario conclusions (Scenarios 1-10)  |  |
| Scenario 1  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | Not IAT |  |  |  |
| Scenario 2  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 3  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 4  |  |  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 5  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 6  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 7  | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 8 | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 9 | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |
| Scenario 10 | Agree | Disagree | Don’t know |
|  | U.S. Marketplace | Not IAT |  |  |  |
|  | Non-U.S. Marketplace | IAT |  |  |  |

**Request For Information:**

**Section 1 – IAT Data Quality**

|  |  |  |
| --- | --- | --- |
| 1. How often do you experience problems with data quality related to IAT entries?
 |  | Frequently |
|  | Occasionally |
|  | Rarely |
|  | Never |
|  | Don’t know |
| What happens when there are problems with data quality?  |

|  |  |  |
| --- | --- | --- |
| 1. When you have problems with data quality, are they related to: (check all that apply)
 |  | Data is completely wrong. |
|  | Data is partially correct. |
|  | Missing data element. |
|  | Other |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI or RDFI of IAT Entries, are there specific fields that frequently contain data elements that are incorrect?
 |  | Yes |
|  | No |
|  | Don’t know |
| If yes, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI or RDFI of IAT Entries, are there specific fields that frequently contain data elements that are missing?
 |  | Yes |
|  | No |
|  | Don’t know |
| If yes, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. As an Originator (initiator) or ODFI of IAT Entries, would the development of an IAT mapping document help provide clearer guidance on proper formatting of an IAT entry and help to resolve or eliminate data quality issues?
 |  | Yes |
|  | No |
|  | Don’t know |
| If yes, please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization believe that there are instances in which an IAT Entry should be permitted to have missing data elements?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. If an Originator is advised by the RDFI that an Entry should be an IAT, but the Receiver does not provide the Originator with the international forwarding payment instructions on file at the RDFI, does your organization believe the Entry should be created with unknown fields blank?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. Does your organization support updating the scheme in the existing IAT guidance on formatting with one missing data element?
 |  | Yes |
|  | No |
|  | Don’t Know |
| 1. Does your organization support adding to the scheme in the existing IAT guidance to include formatting for two missing data elements?
 |  | Yes |
|  | No |
|  | Don’t know |
| 1. Regardless of your answers to Question 54 and Question 55, does your organization agree with the proposed scheme that would utilize “\*” as a data element separator, “-“ as a substitute for missing data, and “\” to indicate the end of the field contents.
 |  | Yes |
| No |
| Don’t know |
| If there is a better, alternative method, please explain. |

**Section 2 – Additional IAT Addenda Records and Formats**

|  |  |  |
| --- | --- | --- |
| 1. Does your organization believe that additional information should accompany an IAT entry compared to current format accommodations (not including date of birth, which is proposed in the Request for Comment)?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. If you answered yes to the above question, please select the type of additional information that should be shared with an IAT entry.
 |  | Information identifying additional parties to the transaction. |
|  | Information identifying additional financial institutions involved in the transaction. |
|  | Purpose of payment/remittance/ invoice information. |
|  | All information provided in the payment instruction. |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. If your organization believes that additional information should accompany an IAT entry, should that information be contained within the IAT transaction format (as opposed to, for example, a reassociation model)?
 |  | Yes |
|  | No |
|  | Don’t know |
| Please explain: |

|  |
| --- |
| 1. If your organization believes there is a need for additional mandatory addenda records for use in every IAT Entry, please explain what they would be used for, how they could be structured, how many would be needed, and any other details:
 |

|  |
| --- |
| 1. If your organization believes there is a need for additional optional addenda records for use in specific types of IAT Entries, please explain what they would be used for, how they could be structured, how many would be needed, and any other details:
 |

**Section 3 – Additional IAT Indicators**

|  |
| --- |
| 1. If your organization believes there is a need for additional indicators within IAT Entries, please explain what they would be used for, how they could be structured, how many would be needed, and any other details:
 |

**Section 4 – Communication of IAT-Related Changes**

|  |  |  |
| --- | --- | --- |
| 1. As an RDFI, how do you communicate to Originators/ODFIs that an Entry should be an IAT? (check all that apply)
 |  | Notification of Change |
|  | Secure email/messaging service |
|  | ACH Return |
|  | Other |
| Please explain: |

|  |  |  |
| --- | --- | --- |
| 1. As an ODFI, how do you receive information related to Entries that should be IAT? (check all that apply)
 |  | Notification of Change |
|  | Secure email/messaging service |
|  | ACH Return |
|  | Other |
| Please explain: |

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 |  | Gateway Operator |
|  | Non-FI End-User |  | Software/Technology provider |
|  | Industry association |  | Third Party Service Provider |
|  | State/local government |  |  |
|  | 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 |