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INTERNATIONAL ACH TRANSACTIONS (IATs) AND RELATED TOPICS
Request for Comment

Proposed Modifications to the Rules
March 31, 2025

PROPOSAL #1 – DEFINITION OF IAT ENTRIES
(proposed effective date – September 18, 2026)

ARTICLE TWO – RIGHTS AND RESPONSIBILITIES OF ODFIS, THEIR ORIGINATORS, AND THIRD-PARTY SENDERS

SECTION 2.5 Provisions for Specific Types of Entries

SUBPART 2.5.8 Specific Provisions for IAT Entries (International ACH Transaction)

Subsection 2.5.8.1 General Rule

An IAT Entry is an Inbound or Outbound debit or credit Entry that is part of a payment transaction involving a Financial Agency's office that is not located in the territorial jurisdiction of the United States. An IAT Entry cannot be a Same Day Entry. An IAT Entry is the U.S. ACH Network component of an international payment transaction that moves money into or out of the jurisdiction of the United States. For purposes of this subsection 2.5.8.1, an international payment transaction is the totality of all the steps that are used to effect the transfer of funds from a payer to a payee into or out of the jurisdiction of the United States. An IAT Entry is used for the domestic component of the international payment. An IAT Entry cannot be a Same Day Entry.

ARTICLE EIGHT – DEFINITIONS OF TERMS USED IN THESE RULES

SECTION 8.44 "Financial Agency"

an entity that is authorized by applicable Legal Requirements to accept deposits or to conduct the business of issuing money orders or transferring funds.

SECTION 8.45 "Foreign Correspondent Bank"

a financial institution or Financial Agency financial agency located in a country other than the United States that holds deposits owned by other financial institutions and provides payment and other services to those other financial institutions.

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SECTION 8.55 "International ACH Transaction" or "IAT Entry" or "IAT"

an Entry that is part of a payment transaction[1] involving a Financial Agency's office that is not located in the territorial jurisdiction of the United States. An office of a Financial Agency is involved in the payment transaction if it (a) holds an account that is credited or debited as part of the payment transaction, (b) receives payment directly from a Person or makes payment directly to a Person as part of the payment transaction, or (c) serves as an intermediary in the settlement of any part of the payment transaction. An International ACH Transaction cannot be a Same Day Entry.

An IAT Entry is the U.S. ACH Network component of an international payment transaction that moves money into or out of the jurisdiction of the United States. For purposes of this definition, an international payment transaction is the totality of all the steps that are used to effect the transfer of funds from a payer to a payee into or out of the jurisdiction of the United States. An IAT Entry is used for the domestic component of the international payment. An International ACH Transaction cannot be a Same Day Entry.

APPENDIX THREE – ACH RECORD FORMAT SPECIFICATIONS

Part 3.2 Glossary of ACH Record Format Data Elements

Subpart 3.2.2 Glossary of Data Elements

Standard Entry Class Code: 3 Positions – Company/Batch Header – Mandatory (all batches)

This field contains a three-character code used to identify various types of Entries.

ACK: ACH Payment Acknowledgment – The code that identifies a Non-Monetary Entry initiated by an RDFI to provide an acknowledgment of receipt by the RDFI of a corporate credit payment originated using the CCD format.

ADV: Automated Accounting Advice – The code that identifies a Non-Monetary Entry that is used by an ACH Operator to provide accounting information regarding an Entry to Participating DFIs in machine-readable format. An Automated Accounting Advice is an optional service provided by ACH Operators and must be requested by a DFI desiring this service.

ARC: Accounts Receivable Entry – The code that identifies a Single Entry debit initiated by an Originator to the Receiver's account based on an Eligible Source Document provided to the Originator by the Receiver (1) via the U.S. mail or delivery service, (2) at a dropbox location, or (3) in person for payment of a bill at a manned location.

ATX: Financial EDI Acknowledgment – The code that identifies a Non-Monetary Entry initiated by an RDFI to provide an acknowledgment of receipt by the RDFI of a corporate credit payment originated using the CTX format.

BOC: Back Office Conversion Entry – The code that identifies a Single Entry debit initiated by an Originator to the Receiver's account based on an Eligible Source Document provided to the Originator by the Receiver at the point of purchase or at a manned bill payment location for subsequent conversion during back office processing.

CCD: Corporate Credit or Debit Entry – The code that identifies an Entry initiated by an Organization to transfer funds to or from an account of that Organization or another Organization.

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[1] *See the Nacha Operating Guidelines chapter on International ACH Transactions for further guidance on payment transactions.*

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CIE: Customer Initiated Entry − The code that identifies a credit Entry initiated by or on behalf of the holder of a Consumer Account to transfer funds to the account of the Receiver.

COR: Notification of Change or Refused Notification of Change − The code that identifies a Non-Monetary Entry Transmitted by (1) an RDFI for the purpose of identifying incorrect information contained within an Entry and providing correct data in the precise format to be used on future Entries, or (2) an ODFI to refuse a misrouted NOC or an NOC that contains incorrect information.

CTX: Corporate Trade Exchange − The code that identifies an Entry initiated by an Organization to transfer funds to or from the account of that Organization or another Organization that permits the inclusion of payment-related remittance information in ANSI or UN/EDIFACT syntax.

DNE: Death Notification Entry − The code that identifies a Non-Monetary Entry initiated by an agency of the Federal Government of the United States to notify an RDFI of the death of a Receiver.

ENR: Automated Enrollment Entry − The code that identifies a Non-Monetary Entry initiated by a Participating DFI to an agency of the Federal Government of the United States on behalf, and at the request, of an account holder at the Participating DFI to enroll in a service that will enable Entries to such Person's account at the Participating DFI.

IAT: International ACH Transaction − ~~The code that identifies an Entry that is part of a payment transaction[2] involving a Financial Agency's office that is not located in the territorial jurisdiction of the United States. An office of a Financial Agency is involved in the payment transaction if it (1) holds an account that is credited or debited as part of the payment transaction, (2) receives payment directly from a Person or makes payment directly to a Person as part of the payment transaction, or (3) serves as an intermediary in the settlement of any part of the payment transaction.~~ The code that identifies an Entry that is the U.S. ACH Network component of an international payment transaction that moves money into or out of the jurisdiction of the United States. For purposes of an IAT Entry, an international payment transaction is the totality of all the steps that are used to effect the transfer of funds from a payer to a payee into or out of the jurisdiction of the United States. An IAT Entry is used for the domestic component of the international payment.

MTE: Machine Transfer Entry − The code that identifies Entries initiated at an "Electronic terminal," as defined in Regulation E, to transfer funds to or from a Consumer Account maintained with an RDFI, i.e., an ATM cash deposit or withdrawal.

POP: Point-of-Purchase Entry − The code that identifies a Single Entry debit initiated by an Originator to the Receiver's account based on an Eligible Source Document provided to the Originator by the Receiver at the point of purchase or manned bill payment location to transfer funds from the Receiver's account.

POS: Point-of-Sale Entry − The code that identifies a debit Entry initiated at an "Electronic terminal," as defined in Regulation E, to transfer funds from a Consumer Account of the Receiver to pay an obligation incurred in a point-of-sale transaction, or to effect a point-of-sale terminal cash withdrawal. Also an adjusting or other credit Entry related to such debit Entry, transfer of funds, or obligation.

PPD: Prearranged Payment and Deposit Entry − The code that identifies an Entry initiated by an Organization based on a standing or a Single Entry authorization from a Receiver to transfer funds to or from a Consumer Account of the Receiver.

RCK: Re-presented Check Entry − The code that identifies a Single Entry debit constituting a presentment notice of an item eligible under Article Two, Subsection 2.5.13.3 (RCK Eligible Items). An RCK Entry is an item as defined by

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[2] ~~See the Nacha Operating Guidelines chapter on International ACH Transactions for further guidance on payment transactions.~~

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Revised Article 4 of the Uniform Commercial Code (1990 Official Text) only for the limited purposes of presentment as set forth in Article 4-110(c) and notice of dishonor as set forth in Article 4-301(a)(2).

SHR: Shared Network Transaction – The code that identifies a debit Entry initiated at an "Electronic terminal," as defined in Regulation E, to transfer funds from a Consumer Account of the Receiver to pay an obligation incurred in a point-of-sale transaction, or to effect a point-of-sale terminal cash withdrawal. Also an adjusting or other credit Entry related to such debit Entry, transfer of funds, or obligation. SHR Entries are initiated in a shared network where the ODFI and RDFI have an agreement in addition to these Rules to process such Entries.

TEL: Telephone-Initiated Entry – The code that identifies a debit initiated by an Originator pursuant to an oral authorization obtained over the telephone to transfer funds from a Consumer Account of the Receiver.

TRC: Check Truncation Entry – The code that identifies a debit Entry initiated pursuant to a Check Truncation Program that permits the Truncation of a single Check drawn on the paying bank.

TRX: Check Truncation Entries Exchange – The code that identifies a debit Entry initiated based on a Check Truncation Program that permits the Truncation of multiple Checks drawn on the same paying bank.

WEB: Internet-Initiated/Mobile Entry – The code that identifies (1) a debit Entry initiated by an Originator to a Consumer Account of the Receiver based on (a) an authorization that is communicated, other than by an oral communication, from the Receiver to the Originator via the Internet or a Wireless Network, or (b) any form of authorization if the Receiver's instruction for the initiation of the individual debit Entry is designed by the Originator to be communicated, other than by an oral communication, to the Originator via a Wireless Network; or (2) a credit Entry initiated by or on behalf of the holder of a Consumer Account that is intended for the Consumer Account of a Receiver, regardless of the manner in which the consumer Originator communicates the payment instruction to the ODFI or Third-Party Service Provider.

XCK: Destroyed Check Entry – The code that identifies a debit Entry initiated with respect to an item eligible under Article Two, Subsection 2.5.18.2 (XCK Eligible Items).

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PROPOSAL #2 – ELIGIBILITY OF IAT ENTRIES FOR SAME-DAY PROCESSING
(proposed effective date – March 19, 2027)

ARTICLE TWO – RIGHTS AND RESPONSIBILITIES OF ODFIS, THEIR ORIGINATORS, AND THIRD-PARTY SENDERS

SECTION 2.5 Provisions for Specific Types of Entries

SUBPART 2.5.8 Specific Provisions for IAT Entries (International ACH Transaction)

Subsection 2.5.8.1 General Rule

An IAT Entry is an Inbound or Outbound debit or credit Entry that is part of a payment transaction involving a Financial Agency's office that is not located in the territorial jurisdiction of the United States. ~~An IAT Entry cannot be a Same Day Entry.~~

ARTICLE EIGHT – DEFINITIONS OF TERMS USED IN THESE RULES

SECTION 8.55 "International ACH Transaction" or "IAT Entry" or "IAT"

an Entry that is part of a payment transaction[3] involving a Financial Agency's office that is not located in the territorial jurisdiction of the United States. An office of a Financial Agency is involved in the payment transaction if it (a) holds an account that is credited or debited as part of the payment transaction, (b) receives payment directly from a Person or makes payment directly to a Person as part of the payment transaction, or (c) serves as an intermediary in the settlement of any part of the payment transaction. ~~An International ACH Transaction cannot be a Same Day Entry.~~

APPENDIX THREE – ACH RECORD FORMAT SPECIFICATIONS

Part 3.2 Glossary of ACH Record Format Data Elements

SUBPART 3.2.2 Glossary of Data Elements

Settlement Date: 3 Positions – Company/Batch Header Record – Inserted by Receiving ACH Operator (all batches)

The Settlement Date (a 3-digit Julian date) for a batch of Entries is inserted by the Receiving ACH Operator. This is the date on which the Participating DFI or its correspondent is scheduled to be debited or credited by the Federal Reserve.

The Settlement Date inserted by the Receiving ACH Operator is the same as the Effective Entry Date, except as noted below.

In the following situations, the Receiving ACH Operator will insert the Banking Day following the Banking Day of processing as the Settlement Date (i.e., the next Banking Day):

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[3] *See the Nacha Operating Guidelines chapter on International ACH Transactions for further guidance on payment transactions.*

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(1)   The Effective Entry Date and the Originating ACH Operator's processing date are the same, but the Entry is received by the Receiving ACH Operator after its deadline for same-day settlement.

(2)   The Effective Entry Date and the Originating ACH Operator's processing date are the same, but the Entry is for an amount greater than $1,000,000.

(3)   ~~The Effective Entry Date and the Originating ACH Operator's processing date are the same, but the Entry bears the IAT Standard Entry Class Code.~~

~~(4)~~ (3) The Entry bears the ENR Standard Entry Class Code.

Entries with invalid or stale Effective Entry Dates will be settled at the next available settlement opportunity.

Return Entries, dishonored Return Entries, and contested dishonored Return Entries are settled by the ACH Operator no earlier than the Effective Entry Date contained within the original Entry, as it appears in the Return Entry Company/Batch Header Record. The return of an Entry that contains an invalid or stale Effective Entry Date will be settled by the ACH Operator at the next available settlement opportunity (i.e., the Banking Day of processing or the next Banking Day).

Notifications of Change will be settled at the next available settlement opportunity, (i.e., the Banking Day of processing or the next Banking Day).

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PROPOSAL #3 – DATE OF BIRTH FIELD FOR IAT ENTRIES
(proposed effective date – March 19, 2027)

APPENDIX THREE – ACH RECORD FORMAT SPECIFICATIONS

Part 3.1 Record Formats

SUBPART 3.1.12 Sequence of Records for IAT Entries

Third IAT Addenda Record

Please refer to the attached record layout for proposed changes to the Third IAT Addenda Record. - (Note: This addenda record is used to identify the Originator's city, state/province, country code, and postal code. This proposal would incorporate space for the optional inclusion of the date of birth for an Originator that is a natural person by re-purposing currently-reserved spaces 74-83 within the Third IAT Addenda Record.)

Seventh IAT Addenda Record

Please refer to the attached record layout for proposed changes to the Seventh IAT Addenda Record. (Note: This addenda record is used to identify the Receiver's city, state/province, country code, and postal code. This proposal would incorporate space for the optional inclusion of the date of birth for a Receiver that is a natural person by re-purposing currently-reserved spaces 74-83 within the Seventh IAT Addenda Record.)

Part 3.2 Glossary of ACH Record Format Data Elements

SUBPART 3.2.2 Glossary of Data Elements

Originator Date of Birth: 10 Positions – Third IAT Addenda Record – Optional (IAT) (New Section)

When the Originator identified in the Second IAT Addenda Record is a natural person, this optional field may be used to convey the Originator's date of birth, in YYYY-MM-DD format.

Payment Related Information: 80 Positions – Addenda Record – Optional (ACK, ATX, CCD, CIE, CTX, DNE, ENR, IAT, PPD, TRX, WEB)

In the Addenda Records of ACK, ATX, CCD, CIE, ENR, IAT, PPD Entries, and debit WEB Entries, an asterisk ("*") must be used as the delimiter between the data elements, and the backslash ("\") or tilde ("~") must be used as the terminator at the end of a data segment.

ACK, ATX: This field contains the ANSI ASC X12 REF (Reference) data segment. This REF segment is used to convey the Identification Number contained within the original CCD or CTX Entry, and/or other information of significance to the Originator.

CCD, PPD: Addenda Records contain payment related ANSI ASC X12 data segments or Nacha-endorsed banking conventions (i.e., Tax Payment, Third-Party Tax Payments, Child Support, or Electronic Dealer Drafting). For CCD Entries that are Health Care EFT Transactions, this field must contain the ASC X12 835 TRN (Reassociation Trace Number) data segment, which conveys the Reassociation Trace Number used by the Health Care Provider to match the payment to remittance data.

For Example:

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TRN*1*12345*1512345678*999999999\

For Example:

TRN*1*12345*1512345678*999999999~

CIE: This field contains payment related ANSI ASC X12 data segments to further identify the payment or Transmit additional remittance information.

For Example:

N1*BT*JohnDoe\N3*12MainStreet\N4*21070\

CTX: This field contains information formatted in accordance with the syntax of ANSI ASC X12.5 and X12.6, an ASC X12 transaction set containing a BPR or BPS data segment, or payment related UN/EDIFACT syntax.

ANSI ASC X12.5 ("Interchange Control Structure") means the standard to define the control structures for the electronic interchange of business transactions encoded in ASC X12-based syntax. This standard provides the interchange envelope of a header and trailer for the electronic interchange through a data transmission, a structure to acknowledge the receipt and processing of this envelope, and optional, interchange-level service request structures.

ANSI ASC X12.6 ("Application Control Structure") means the standard used to define the structure of business transactions for computer-to-computer interchange. This structure is expressed using a symbolic representation of X12 data in terms of both the design and use of X12 structures, independent of the physical representation (e.g., character set encoding).

BPR or BPS Data Segment ("Beginning Segment for Payment Order/Remittance Advice") means the beginning segment for the payment order/remittance advice used in ASC X12-based syntax to indicate the beginning of a payment-related transaction set that contains the necessary banking information to process the transaction.

DNE: Addenda Records contains the following Nacha-endorsed banking convention starting in position 04:

DATE OF DEATH*MMDDYY*CUSTOMERSSN*

##########*AMOUNT*$$$$.cc\

The date of death always appears in positions 18-23. If the Social Security Number (SSN) is not available, positions 38-46 contain zeros. The amount of the expected beneficiary payment always begins in position 55.

ENR: All information in this field pertains to the account holder on whose behalf the Automated Enrollment Entry is initiated.

This field contains the following Nacha-endorsed banking convention:

TRANSACTION CODE*RECEIVING DFI IDENTIFICATION NUMBER*CHECK DIGIT*DFI ACCOUNT NUMBER*INDIVIDUAL IDENTIFICATION NUMBER/IDENTIFICATION NUMBER*INDIVIDUAL NAME (SURNAME)/COMPANY NAME*INDIVIDUAL NAME (FIRST NAME)/COMPANY NAME*REPRESENTATIVE PAYEE INDICATOR/ENROLLEE CLASSIFICATION CODE\

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Transaction Code − This field contains the Transaction Code of the account holder's account. This field contains "22" (Demand Credit), "27" (Demand Debit), "32" (Savings Credit), or "37" (Savings Debit). (2 positions)

Receiving DFI Identification Number − This field contains the routing number used to identify the DFI at which the account holder maintains its account. (8 positions)

Check Digit − This field contains the check digit pertaining to the routing number for the DFI at which the account holder maintains its account. (1 position)

DFI Account Number − This field contains the account holder's account number. (1 - 17 positions)

Individual Identification Number/Identification Number − For automated enrollments initiated on behalf of consumers, this field contains the consumer's Social Security Number. For automated enrollments initiated on behalf of companies, this field contains the company's Taxpayer Identification Number. (9 positions)

Individual Name (Surname)/Company Name − This field contains the consumer's surname or the first fifteen characters of the Company Name. (1-15 positions)

Individual Name (First Name)/Company Name − This field contains the consumer's first name or the next seven characters of the Company Name. (1-7 positions).

Representative Payee Indicator/Enrollee Classification Code − For enrollments for Federal Government benefit payments, this field contains "0" (zero) meaning "no" or "1" (one) meaning "yes" to denote whether the authorization is being initiated by someone other than the named beneficiary.

For all other enrollments, this field contains "A" to indicate that the enrollee is a consumer, or "B" to indicate that the enrollee is a company. (1 position)

For Example:

22*12200004*3*123987654321*777777777*DOE*JOHN*0\

22*12200004*3*987654321123*876543210*ABCCOMPANY**B\

27*12200004*3*987654321123*876543210*ABCELECTRONICIN*DUSTRIE*B\

IAT: This field contains 80 characters of payment related information. When the payment related information for an IAT Entry includes the identification of a country, that country must be identified using that country's two-character alphabetic country code, as defined within the International Organization for Standardization's 31661alpha-2 code list. (Note: A maximum of two optional Addenda Records may be used for IAT remittance information.)

Identification of Ultimate Foreign Beneficiary/Payer − For Inbound IAT Entries, this field must contain the ultimate foreign beneficiary's or payer's name, street address, city, state/province, postal code, and two-character alphabetic ISO country code (as defined within the International Organization for Standardization's 3166-1-alpha-2 code list) when:

(1) the proceeds from a debit Inbound IAT Entry are for further credit to an ultimate foreign beneficiary that is a party other than the Originator of the debit IAT Entry; or

(2) the funding for a credit Inbound IAT Entry is ultimately from a foreign party that is not the Originator of the credit IAT Entry.

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Identification of Ultimate Foreign Beneficiary/Payer − For Inbound IAT Entries for which (i) the proceeds from a debit Inbound Entry are for further credit to an ultimate foreign beneficiary that is a party other than the Originator of the debit IAT entry; or (ii) the funding for a credit Inbound IAT Entry is ultimately from a foreign party that is not the Originator of the credit IAT Entry, the Payment Related Information Field of the IAT Remittance Addenda Record must contain the ultimate foreign beneficiary's/payer's name, street address, city, state/province, postal code, and two-character alphabetic ISO country code (as defined within the International Organization for Standardization's 3166-1-alpha-2 code list). This field may also include the ultimate foreign beneficiary's/payer's date of birth (in YYYY-MM-DD format) when that party is a Natural Person. The identification of the ultimate foreign beneficiary (of the debit) or ultimate foreign payer (of the credit) takes priority over the inclusion of other payment related information.

For Example:

Johann Schmidt*Mainzer Landstrasse 201*60326*Frankfurt am Main*DE*1961-11-02\

When the Transaction Type Code Field within the First IAT Addenda Record contains ARC, BOC, or RCK, this field must contain the Check Serial Number starting in position 04:

CHECK SERIAL NUMBER\

For example: 3349809002\

When the Transaction Type Code Field within the First IAT Addenda Record contains POP, this field must contain the following Nacha-endorsed banking convention starting in position 04:

CHECK SERIAL NUMBER (MAXIMUM OF 9 CHARACTERS)*TERMINAL CITY (MAXIMUM OF 4 CHARACTERS)*TERMINAL STATE/FOREIGN COUNTRY (2 CHARACTERS)\

For example: 123456789*PARI*FR\

When the Transaction Type Code Field within the First IAT Addenda Record contains MTE, POS, or SHR, this field must contain the following Nacha-endorsed banking convention starting in position 04:

TERMINAL IDENTIFICATION CODE (MAXIMUM OF 6 CHARACTERS)*TERMINAL LOCATION (MAXIMUM OF 27 CHARACTERS)*TERMINAL CITY (MAXIMUM OF 15 CHARACTERS)*TERMINALSTATE/FOREIGN COUNTRY (2 CHARACTERS)\

For example:

200509*321 EAST MARKET STREET*
ANYTOWN*VA\

367802*10TH & VINE STREETS STREETS*LONDON*UK\

TRX: This field contains information formatted in accordance with National Association for Check Safekeeping syntax.

WEB: For a debit WEB Entry, Addenda Records contain payment related ANSI ASC X12 data segments or Nacha-endorsed banking conventions (i.e., Tax Payment, Third-Party Tax Payment, Child Support, or Electronic Dealer Drafting). For a credit WEB Entry, this field contains 80 characters of payment related information.

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Receiver Date of Birth: 10 Positions – Seventh IAT Addenda Record – Optional (IAT) (New Section)

When the Receiver identified in the First IAT Addenda Record is a natural person, this optional field may be used to convey the Receiver's date of birth, in YYYY-MM-DD format.

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PROPOSAL #4 – NON-BANK FINANCIAL AGENCIES IN IAT ENTRIES
(proposed effective date – March 19, 2027)

APPENDIX THREE – ACH RECORD FORMAT SPECIFICATIONS

Part 3.2 Glossary of ACH Record Format Data Elements

SUBPART 3.2.2 Glossary of Data Elements

Originating DFI Branch Country Code: 3 Positions – Addenda Record – Mandatory (IAT)

This field contains a two-character alphabetic country code, as defined within the International Organization for Standardization's (ISO) 3166-1-alpha-2 code list, to identify the country in which the branch of the bank or other financial agency that originated the Entry is located. This code must correspond to the country in which the bank branch or other financial agency identified within the Originating DFI Identification field of the Fourth IAT Addenda Record is located.

Originating DFI Identification: 8 Positions – Company/Batch Header Record – Mandatory (all batches except IAT); 8 Positions – Company/Batch Control Record – Mandatory (all batches); 34 Positions – Addenda Record – Mandatory (IAT)

This field contains the routing number of the DFI originating the Entries within the batch.

IAT:

• For Inbound IAT Entries, the Originating DFI Identification Field within the Fourth IAT Addenda Record must contain the ~~National Clearing System Number~~ identification number of the foreign financial institution or other foreign financial agency providing funding for the payment transaction.

• For Outbound IAT Entries, the Originating DFI Identification Field within the Fourth IAT Addenda Record must contain the routing number of the U.S. ODFI or the foreign financial institution or other foreign financial agency that has provided the funding for the transaction.

• For IAT Entries, the Originating DFI Identification Field within the Company/Batch Control Record must contain the information found within positions 80-87 (GO/Originating DFI Identification) of the IAT Company/Batch Header Record.

Originating DFI Identification Number Qualifier: 2 Positions – Addenda Record – Mandatory (IAT)

This field contains a 2-digit code that identifies the numbering scheme used in the Originating DFI Identification Number field of the Fourth IAT Addenda Record. Code values for this field are:

01 National Clearing System Number

02 BIC Code

03 ~~IBAN~~ Other

Originating DFI Name: 35 Positions – Addenda Record – Mandatory (IAT)

~~This field contains the name of the ODFI.~~

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- For Inbound IAT Entries, the Originating DFI Name Field within the Fourth IAT Addenda Record must contain the name of the foreign financial institution or other foreign financial agency initiating the payment transaction, as identified within the Originating DFI Identification field of the Fourth IAT Addenda Record.

- For Outbound IAT Entries, this field must contain the name of the U.S. ODFI or the foreign financial institution or other foreign financial agency that has provided the funding for the transaction.

Receiving DFI Branch Country Code: 3 Positions – Addenda Record – Mandatory (IAT)

This field contains the two-character alphabetic country code, as defined within the International Organization for Standardization's (ISO) 3166-1-alpha-2 code list, to identify the country in which the branch of the bank or other financial agency that receives the Entry is located.

Receiving DFI Identification: 8 Positions – Entry Detail Record – Mandatory (ACK, ADV, ARC, ATX, BOC, CCD, CIE, CTX, DNE, ENR, MTE, POP, POS, PPD, RCK, SHR, TEL, TRC, TRX, WEB, XCK, refused ACK, refused ATX, Returns, dishonored Returns, contested dishonored Returns, COR, refused COR); 34 Positions – Addenda Record – Mandatory (IAT)

The standard routing number (with Check Digit), as assigned by ~~Accuity~~ the American Bankers Association's registrar, ~~(with Check Digit)~~ is used to identify the DFI in which the Receiver maintains his account or a routing number assigned to a Federal Government agency by the Federal Reserve. For Inbound IAT Entries, this field contains the bank identification number of the ~~DFI~~ U.S. RDFI at which the Receiver maintains his account. For Outbound IAT Entries, this field contains the identification number of the foreign financial institution or other foreign financial agency at which the Receiver maintains his account.

ENR: This field contains the routing number assigned to a Federal Government agency for the purpose of the automated enrollment process. Any Entry with a dollar value directed to that routing number in error is not subject to compensation rights as provided in these Rules.

Receiving DFI Identification Number Qualifier: 2 Positions – Addenda Record – Mandatory (IAT)

This field contains a 2-digit code that identifies the numbering scheme used in the Receiving DFI Identification Number field. Code values for this field are:

01 National Clearing System Number

02 BIC Code

03 ~~IBAN~~ Other

Receiving DFI Name: 35 Positions – Addenda Record – Mandatory (IAT)

~~This field contains the name of the Receiving Depository Financial Institution.~~

For an Inbound IAT Entry, this field contains the name of the U.S. RDFI at which the Receiver maintains his account.

For an Outbound IAT Entry, this field contains the name of the foreign financial institution or other foreign financial agency at which the Receiver maintains his account.

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PROPOSAL #5 – REGISTRATION OF IAT CONTACTS
(proposed effective date – September 18, 2026)

ARTICLE ONE – GENERAL RULES

Section 1.14 Participating DFI Contact Registration

A Participating DFI must register with the National Association specific contact information for personnel or departments responsible for: (a) ACH operations; ~~and~~ (b) fraud and/or risk management; and (c) inquiries related to International ACH Transactions (IAT Entries). A Participating DFI may register contacts for additional personnel or departments, at its discretion.

For each of the areas listed above, a Participating DFI must provide the National Association with either: (a) the name, title, email address, and phone number for at least one primary and one secondary contact person; or (b) general department contact information that includes an email address and a working telephone number. Registered phone numbers and email addresses must be those that are monitored and answered during normal business hours for financial institution inquiries.

A Participating DFI must update the registration information within 45 days following any change to the information previously provided, and must verify all registration information at least annually.

The National Association will make registered contact information available, via secure means, only to (a) registered Participating DFIs; (b) ACH Operators; and (c) Associations, for purposes of addressing ACH operational, fraud, ~~and~~ risk management, and IAT issues within the ACH Network. The National Association will use registered contact information only for purposes of addressing ACH Network operational, ~~risk and~~ fraud, risk management, and IAT issues.

Participating DFIs, ACH Operators, and Associations accessing registered contact information agree that they will use such information solely for their own, internal use for the purposes permitted in this Subsection.

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PROPOSAL #6 –VALID CHARACTERS FOR ACH RECORDS
(proposed effective date – March 19, 2027)

APPENDIX ONE – ACH FILE EXCHANGE SPECIFICATIONS

Part 1.2 Data Specifications for ACH Records

The following table shows the data specifications for ACH Records.

TYPE OF FIELD	ALPHABETIC/ ALPHAMERIC	NUMERIC
Valid Characters	0-9, A-Z, a-z, space, ~~EBCDIC values greater than hexadecimal "3F", ASCII values greater than hexadecimal "1F"~~ and those special characters specifically identified in Appendix R (Valid Characters for ACH Entries) of the Nacha Operating Guidelines	0-9
Justification	Left	Right
Empty Field Handling	Space filled	Zero filled
Special Notes	Certain fields require the use of UPPERCASE characters – see below.	Must be unsigned (Neither positive (+) ~~or~~ nor negative (–) signage.)

UPPERCASE characters must be used for all of the following:

- all alphabetic characters within the Standard Entry Class Code field;

- all alphabetic characters within the File ID Modifier field;

- all alphabetic characters within the Change Code and Refused COR Code fields;

- all alphabetic characters within the Return Reason Code, Dishonored Return Reason Code, and Contested Dishonored Return Reason Code fields;

- Company Entry Description fields containing the words "ACCTVERIFY" (for Micro-Entries), "PAYROLL," "PURCHASE," "RETRY PYMT," "REVERSAL," "RETURN FEE," "RECLAIM," "NONSETTLED," "AUTOENROLL" (for ENR entries), "REDEPCHECK" (for RCK entries), "NO CHECK" (for XCK entries), and "HCCLAIMPMT" (for Health Care EFT Transactions); and

- Company Name fields containing the words "CHECK DESTROYED" (for XCK entries).

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PROPOSAL #7 – NEW RETURN REASON CODE FOR ENTRY RETURNED PER OFAC INSTRUCTION
(proposed effective date – March 19, 2027)

ARTICLE THREE – RIGHTS AND RESPONSIBILITIES OF RDFIS AND THEIR RECEIVERS

Subsection 3.8.3.6 Timing Requirements for Entries Returned Per OFAC Instruction (New Subsection)

An RDFI that has been instructed by OFAC to return an Entry must Transmit such a Return Entry to its ACH Operator by the ACH Operator's deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the second Banking Day following the RDFI's receipt of OFAC's instruction to return the Entry.

APPENDIX FOUR – RETURN ENTRIES

Part 4.2 Table of Return Reason Codes

Please refer to the attached Table of Return Reason Codes. (Note: This proposal defines a new Return Reason Code R90 (Entry Returned Per OFAC Instruction) to enable clear identification of an entry returned by a financial institution as a result of an instruction from OFAC. This proposal also modifies Return Reason Code R16 (currently defined as Account Frozen/Entry Returned Per OFAC Instruction) to remove OFAC-related return conditions from the return reason's code title and description. R16 will revert to its original title "Account Frozen" and be used exclusively by an RDFI to return entries when access to the Receiver's account is restricted due to specific action taken by the RDFI or by legal action.)

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APPENDIX A

Several proposals included within this Request for Comment make independent changes that would affect the same section of the Nacha Operating Rules. This Appendix illustrates the combined impact of those changes to show how affected sections would read upon implementation if all proposed changes were approved.

ARTICLE TWO – RIGHTS AND RESPONSIBILITIES OF ODFIS, THEIR ORIGINATORS, AND THIRD-PARTY SENDERS

SECTION 2.5 Provisions for Specific Types of Entries

SUBPART 2.5.8 Specific Provisions for IAT Entries (International ACH Transaction)

Subsection 2.5.8.1 General Rule

An IAT Entry is the U.S. ACH Network component of an international payment transaction that moves money into or out of the jurisdiction of the United States. For purposes of this subsection 2.5.8.1, an international payment transaction is the totality of all the steps that are used to effect the transfer of funds from a payer to a payee into or out of the jurisdiction of the United States. An IAT Entry is used for the domestic component of the international payment.

ARTICLE EIGHT – DEFINITIONS OF TERMS USED IN THESE RULES

SECTION 8.55 "International ACH Transaction" or "IAT Entry" or "IAT"

An IAT Entry is the U.S. ACH Network component of an international payment transaction that moves money into or out of the jurisdiction of the United States. For purposes of this definition, an international payment transaction is the totality of all the steps that are used to effect the transfer of funds from a payer to a payee into or out of the jurisdiction of the United States. An IAT Entry is used for the domestic component of the international payment.

SUBPART 3.1.12 Sequence of Records for IAT Entries (continued)

SECOND IAT ADDENDA RECORD

FIELD	1	2	3	4	5	6
DATA ELEMENT NAME	RECORD TYPE CODE	ADDENDA TYPE CODE	ORIGINATOR NAME	ORIGINATOR STREET ADDRESS	RESERVED	ENTRY DETAIL SEQUENCE NUMBER
Field Inclusion Requirement	M	M	M	M	N/A	M
Contents	'7'	'11'	Alphameric	Alphameric	Blank	Numeric
Length	1	2	35	35	14	7
Position	01-01	02-03	04-38	39-73	74-87	88-94

THIRD IAT ADDENDA RECORD

FIELD	1	2	3	4	5	5 6	6 7
DATA ELEMENT NAME	RECORD TYPE CODE	ADDENDA TYPE CODE	ORIGINATOR CITY & STATE/PROVINCE	ORIGINATOR COUNTRY & POSTAL CODE	ORIGINATOR DATE OF BIRTH	RESERVED	ENTRY DETAIL SEQUENCE NUMBER
Field Inclusion Requirement	M	M	M	M	O	N/A	M
Contents	'7'	'12'	Alphameric	Alphameric	YYYY-MM-DD	Blank	Numeric
Length	1	2	35	35	10	14 4	7
Position	01-01	02-03	04-38	39-73	74-83	74-87 84-87	88-94

SUBPART 3.1.12 Sequence of Records for IAT Entries (continued)

SIXTH IAT ADDENDA RECORD

FIELD	1	2	3	4	5	6
DATA ELEMENT NAME	RECORD TYPE CODE	ADDENDA TYPE CODE	RECEIVER IDENTIFICATION NUMBER	RECEIVER STREET ADDRESS	RESERVED	ENTRY DETAIL SEQUENCE NUMBER
Field Inclusion Requirement	M	M	O	M	N/A	M
Contents	'7'	'15'	Alphameric	Alphameric	Blank	Numeric
Length	1	2	15	35	34	7
Position	01-01	02-03	04-18	19-53	54-87	88-94

SEVENTH IAT ADDENDA RECORD

FIELD	1	2	3	4	5	~~5~~ 6	~~6~~ 7
DATA ELEMENT NAME	RECORD TYPE CODE	ADDENDA TYPE CODE	RECEIVER CITY & STATE/PROVINCE	RECEIVER COUNTRY & POSTAL CODE	RECEIVER DATE OF BIRTH	RESERVED	ENTRY DETAIL SEQUENCE NUMBER
Field Inclusion Requirement	M	M	M	M	O	N/A	M
Contents	'7'	'16'	Alphameric	Alphameric	YYYY-MM-DD	Blank	Numeric
Length	1	2	35	35	10	~~14~~ 4	7
Position	01-01	02-03	04-38	39-73	74-83	~~74-87~~ 84-87	88-94

CODE	TITLE	DESCRIPTION	INITIATED BY	RETURN TYPE	ACCOUNT TYPE	TIME FRAME	WRITTEN STATEMENT REQUIRED	CROSS REFERENCE	NOTES
R12	**Account Sold to Another DFI**	A financial institution received an Entry to an account that was sold to another financial institution.	RDFI	Return	Consumer or Non-Consumer	* 2 Banking Days	No	Article Three, Section 3.8 - RDFI's Right to Transmit Return Entries.	
R13	**Invalid ACH Routing Number**	Entry contains a Receiving DFI Identification or Gateway Identification that is not a valid ACH routing number.	ACH Operator	Reject/ Return	Consumer or Non-Consumer	Next file delivery time following processing	No	Appendix Two, Part 2.5 (Automatic Entry Detail Rejection Criteria).	For ACH Operator use only.
R14	**Representative Payee Deceased or Unable to Continue in That Capacity**	The representative payee is either deceased or unable to continue in that capacity. The beneficiary is not deceased.	RDFI	Return	Consumer or Non-Consumer	* 2 Banking Days	No	Article Three, Section 3.8 - RDFI's Right to Transmit Return Entries.	The representative payee is a person or institution authorized to accept Entries on behalf of one or more other persons, such as legally incapacitated adults or minor children.
R15	**Beneficiary or Account Holder (Other Than a Representative Payee) Deceased**	(1) The beneficiary is deceased; or (2) the account holder is deceased.	RDFI	Return	Consumer	* 2 Banking Days	No	Article Three, Section 3.8 - RDFI's Right to Transmit Return Entries.	(1) The beneficiary is the person entitled to the benefits and may or may not be the account holder; or (2) the account holder is the owner of the account and is not a representative payee.
R16	**Account Frozen/ Entry Returned Per OFAC Instruction**	(1) Access to the account is restricted due to specific action taken by the RDFI or by legal action; or (2) OFAC has instructed the RDFI or Gateway to return the Entry.	RDFI or Gateway	Return	Consumer or Non-Consumer	* 2 Banking Days	No	Article Three, Section 3.8 - RDFI's Right to Transmit Return Entries.	

* Each Return Entry must be received by the RDFI's ACH Operator by its deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the second Banking Day following the Settlement Date of the original Entry.

** Each Return Entry must be received by the RDFI's ACH Operator by its deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the Banking Day following the sixtieth calendar day following the Settlement Date of the original Entry.

CODE	TITLE	DESCRIPTION	INITIATED BY	RETURN TYPE	ACCOUNT TYPE	TIME FRAME	WRITTEN STATEMENT REQUIRED	CROSS REFERENCE	NOTES
R39	Improper Source Document/ Source Document Presented for Payment	The RDFI determines that: (1) the source document used for an ARC, BOC, or POP Entry to its Receiver's account is improper, or (2) an ARC, BOC, or POP Entry and the source document to which the Entry relates have both been presented for payment and posted to the Receiver's account.	RDFI	Return	Consumer or Non-Consumer	* 2 Banking Days	No	Article Three, Subsection 3.12.2.1 - Improper ARC, BOC, and POP Debit Entries. Article Eight, Section 8.36 - Eligible Source Document.	For use with ARC, BOC, and POP Entries only and when the RDFI (rather than the Receiver) determines the Entry is improper.

** NOTE ** — REFER TO THE R90'S SERIES OF CODES IN THIS TABLE FOR ADDITIONAL CODES TO BE USED BY RDFIS FOR THE RETURN OF ENTRIES **

RETURN REASON CODES TO BE USED BY FEDERAL GOVERNMENT AGENCIES RETURNING ENR ENTRIES

CODE	TITLE	DESCRIPTION	INITIATED BY	RETURN TYPE	ACCOUNT TYPE	TIME FRAME	WRITTEN STATEMENT REQUIRED	CROSS REFERENCE	NOTES
R40	Return of ENR Entry by Federal Government Agency	This Return Reason Code may only be used to return ENR Entries and is at the Federal Government Agency's sole discretion.	Federal Government Agency	Return - ENR Only	N/A	N/A	No	The Green Book https://www. fiscal.treasury.gov/fsreports/ ref/greenBook/downloads.htm	For Federal Government Agency use only.

* Each Return Entry must be received by the RDFI's ACH Operator by its deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the second Banking Day following the Settlement Date of the original Entry.

** Each Return Entry must be received by the RDFI's ACH Operator by its deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the Banking Day following the sixtieth calendar day following the Settlement Date of the original Entry.

ADDITIONAL CODES TO BE USED BY RDFIS FOR THE RETURN OF ENTRIES

CODE	TITLE	DESCRIPTION	INITIATED BY	RETURN TYPE	ACCOUNT TYPE	TIME FRAME	WRITTEN STATEMENT REQUIRED	CROSS REFERENCE	NOTES
R90	Entry Returned Per OFAC Instruction	OFAC has instructed the RDFI or Gateway to return the Entry.	RDFI or Gateway	Return	Consumer or Non-Consumer	RDFI or Gateway must transmit the Return Entry to the ACH Operator by the ACH Operator's deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the second Banking Day following the RDFI's receipt of the instruction from OFAC to return the Entry.	No	Article Three, Section 3.8.3.6 (Timing Requirements for Entries Returned Per OFAC Instruction)	

* Each Return Entry must be received by the RDFI's ACH Operator by its deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the second Banking Day following the Settlement Date of the original Entry.

** Each Return Entry must be received by the RDFI's ACH Operator by its deposit deadline for the Return Entry to be made available to the ODFI no later than the opening of business on the Banking Day following the sixtieth calendar day following the Settlement Date of the original Entry.