



Request for Comment and Information International ACH Transactions and Related Topics

Executive Summary **March 31, 2025**

The ACH Network supports the flow of credits and debits into or out of the U.S. through the International ACH Transaction (IAT). A U.S.-based ODFI can send an outbound IAT through the ACH Network to a gateway that then transfers the transactions out of the U.S. Conversely, a U.S.-based RDFI can receive inbound IATs from an ACH Operator that were originated into the ACH Network by a gateway.

The original IAT rules went into effect in 2009, establishing a transaction format that carries data elements to satisfy requirements of the Travel Rule. Data fields in IATs identify correspondent financial institutions and allow limited remittance information.

The IAT rules were last modified in 2014. More recently, an industry work group discussed additional topics regarding IAT use and processing, and made recommendations for further amendments to the Nacha Operating Rules for IATs. Many of the topics in this combined Request for Comment and Request for Information stemmed from the group's work; others were developed by the Rules and Operations Committee and the ACH Operators.

Now Nacha seeks comments from interested parties on seven proposals to modify the IAT rules and on additional "IAT or not IAT" scenarios intended to help industry participants identify when to use IAT. Generally, these proposed rules and scenarios are intended to improve the industry's understanding of IAT, increase the efficiency of IAT processing, and better enable IAT-related exception resolution.

Nacha also seeks industry feedback on other topics related to IATs that could serve as the basis of future rules proposals. These topics generally concern the quality and formatting of data contained in IATs. Comments on all topics are requested by Friday, May 30, 2025.

Request for Comment on Proposals to Amend the Nacha Rules

Nacha is issuing for comment seven specific proposals to amend the Nacha Rules:

1. Simplifying the Definition of IAT Entries.
2. Making IAT Entries Eligible for Same-Day Processing.
3. Creating a Date of Birth Field for Optional Use in IAT Entries.
4. Allowing Outbound IATs to Accounts at Non-Bank Financial Agencies.
5. Requiring Registration of IAT Contacts in Nacha's ACH Contact Registry.
6. Establishing Valid Characters in IAT and All ACH Records.
7. Creating a New Return Reason Code R90 for Entry Returned Per OFAC Instruction.

Nacha is also requesting comment on ten new scenarios intended to help industry participants identify when to use or not use IAT. While not part of the Nacha Rules language, scenarios highlight important principles in determining when to use IAT. These new scenarios concern online marketplace transactions.

Nacha requests comment and feedback from the industry on all aspects of these Rules proposals.

Request for Information on Other IAT Topics

In addition to the Rules proposals described above, Nacha also requests the industry to provide information and perspectives on four additional topics related to IAT processing. While these topics are not being put forth as proposals to amend the Nacha Rules, industry feedback could form the basis for future Rules proposals.

1. Quality of Data Contained in IATs.
2. Industry Need for Additional IAT Addenda Records.
3. Industry Need for Additional IAT Transaction Codes or Indicators.
4. Communication of IAT-Related Changes through NOCs and Returns.

Comment Process

All Nacha proposed rules are open for public comment via a Request for Comment. Nacha encourages responses from ACH Network participants and interested parties. Comments on the seven proposals to modify the Nacha Rules and the additional IAT scenarios, as well as responses on the Request for Information topics, are requested by **Friday, May 30, 2025**.

For more information about the proposed rules and how to submit comments, please visit <https://www.nacha.org/rules/proposed>.