Request for Comment:
Increasing the Same Day ACH Dollar Limit to $10 Million

Date: November 10, 2025

Comment Deadline: December 18, 2025

Request for Comment: Increasing the Same Day ACH Dollar Limit to $10 Million

Since inception in September 2016, Same Day ACH has handled over 5.25 billion payments moving $12.1 trillion. The capabilities of Same Day ACH have been enhanced numerous times: 1) adding a third, daily processing window; 2) increasing the per-payment dollar limit on two separate occasions; and 3) accelerating funds availability (see next slide). Same Day ACH, inclusive of these enhancements, has benefitted the consumers, businesses and other organizations that use ACH payments.

Now, Nacha is seeking comments on once again raising the per-entry dollar limit for Same Day ACH. This change would increase the limit from $1 million per payment to $10 million per payment.

All ACH Network participants are encouraged to provide their comments on this proposal and the questions posed. Responses on this RFC are requested by **Thursday, December 18, 2025**.

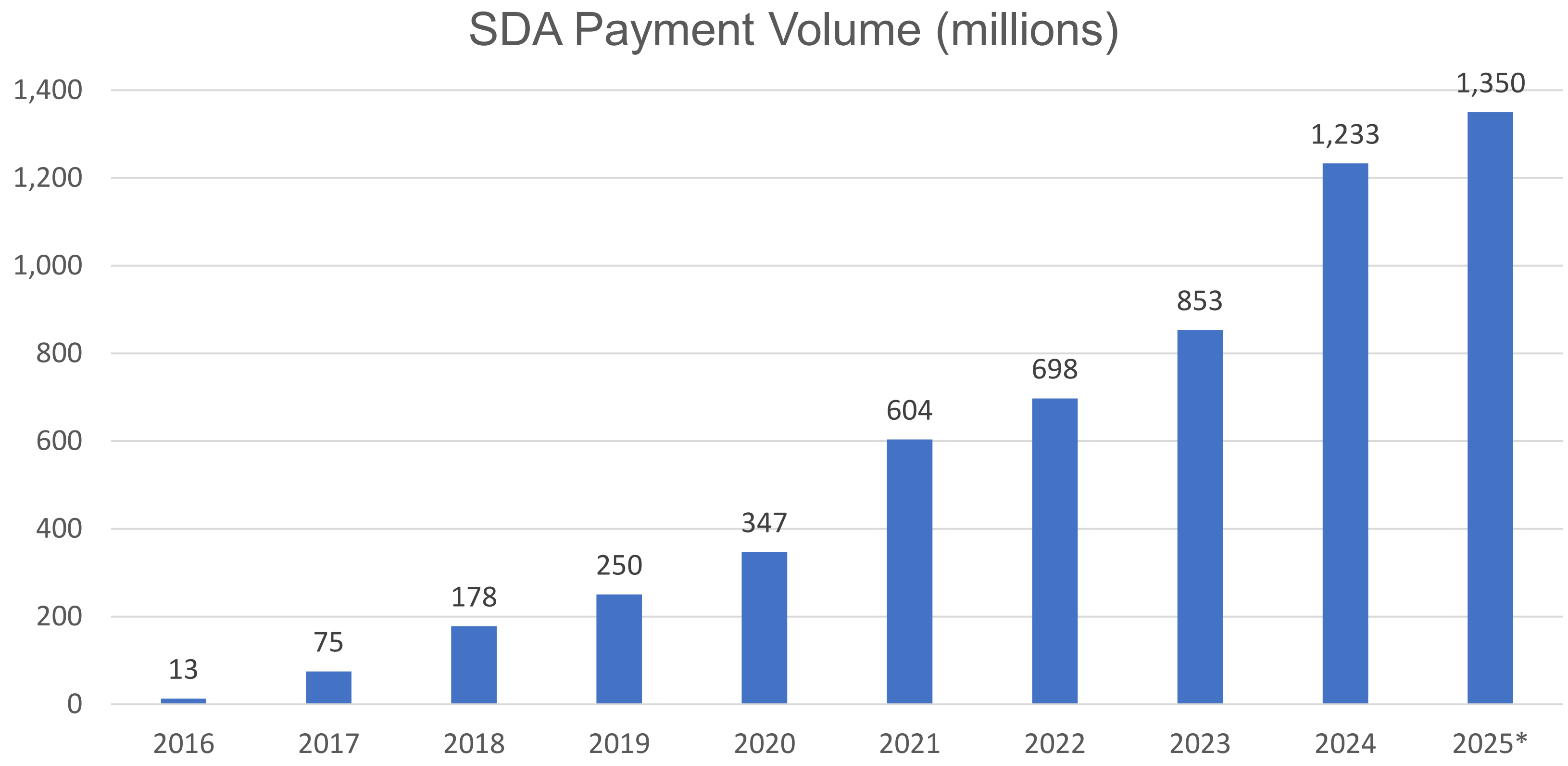
The Same Day ACH Journey

The capabilities of Same Day ACH have been enhanced many times after the initial three phases went live in 2016-2018.

2016	**Same Day ACH credits**
2017	**Same Day ACH debits**
2018	**Faster funds availability for Same Day ACH credits**
2019	**Faster funds availability for certain Same Day ACH and non-Same Day ACH credits**
2020	**Same Day ACH dollar limit increased from $25,000 to $100,000**
2021	**Third daily Same Day ACH window**
2022	**Same Day ACH dollar limit increased from $100,000 to $1 million**

Same Day ACH Volume

Starting with 13 million payments in 2016, Same Day ACH volume exceeded 1.2 billion in 2024, representing almost 50% growth vs 2023.



* Estimated

Increasing the Same Day ACH Dollar Limit – Proposal Rationale

The proposal would continue to expand the capabilities of Same Day ACH.

Increasing the Same Day ACH dollar limit is expected to improve Same Day ACH use cases and contribute to additional adoption.

- Many specific use cases would be enhanced by increasing the dollar limit.
- Some ACH Originators may need a higher percentage of their ACH payments to be eligible for Same Day ACH in order to justify adopting Same Day ACH.

The March 18, 2022 Same Day ACH dollar limit increase from $100,000 to $1 million had an immediate impact on the use of Same Day ACH.

- From February 2022 to April 2022, the number of Same Day ACH payments increased 30% and the value of those payments increased 118%.

Proposed Rule Change and Effective Date

The proposal would increase the Same Day ACH dollar limit to $10,000,000 per payment.

The increase would apply to all Same Day ACH payments.

- ACH credits and debits.
- Consumer and business payments.
- All eligible SEC Codes[1].

Implementing the increase for both debit and credit Same Day ACH Entries would maintain the uniformity of eligibility for Same Day ACH, and preserve the utility of same-day reversals (e.g., a reversing debit of an erroneous credit).

Proposed effective date: March 19, 2027.

[1] Other dollar limits for ARC, BOC, POP, RCK and XCK entries would still apply.

Anticipated Benefits

Increasing the dollar limit is anticipated to enhance many Same Day ACH uses cases and contribute to ongoing adoption of Same Day ACH.

Existing use cases would be improved by making a greater percentage of an Originator's payments eligible for Same Day ACH.

- Business-to-business payments: Businesses, government agencies and other organizations would be able to use Same Day ACH for vendor and supply chain invoices up to $10 million.
- Tax payments: Businesses and organizations could use Same Day ACH for remittance of tax payments to government agencies that are above the current $1 million limit.
- Cash concentration: Businesses and other organizations that concentrate account balances into central accounts could do so using either Same Day ACH credits or debits up to $10 million.
- Payroll funding: While payroll credits are typically not above $1 million, many payrolls are funded using an ACH debit. Using a Same Day ACH debit up to $10 million could increase liquidity and interest earning potential for an employer, or reduce credit risk for a payroll provider.
- Insurance claims: Claim payments can be in excess of $1 million and would benefit from a higher Same Day ACH limit.
- Reversals: The ACH Network offers the ability to reverse erroneous payments under a limited number of circumstances. A higher dollar limit would enable more reversals to be made on a same-day basis, including the reversal of Same Day ACH forward transactions.

Anticipated Benefits

A greater number of ACH payments, and especially ACH dollar volume, would be eligible for Same Day ACH.

- The annual value of new ACH dollars that would be eligible for Same Day ACH is estimated to be $7-8 trillion.

Implementing the increase for both debit and credit Same Day ACH Entries would preserve the utility of Reversing Entries and funding use cases.

Anticipated Benefits

All Participants:

- Same Day ACH would correspond to recent dollar limit increases for other account-based payment systems:
  - RTP® raised the per payment limit from $1 million to $10 million in June 2025.
  - FedNow® announced it will increase from $1 million to $10 million in November 2025.

- Parity across relevant payments systems can increase efficiency of operations and reduce confusion for participants, particularly businesses and other organizations that use these systems.
  - Consistent dollar limits across multiple payment systems can enhance resiliency.

Anticipated Impacts

All Participants:

- A dollar limit increase would result in a larger amount of dollars settling at several times throughout the day – 1:00 pm; 5:00 pm, and 6:00 pm (all in ET).
- All ACH participants should understand, analyze and plan for these dollar flows within their organizations.
  - What are the potential impacts of higher-dollar Same Day ACH credits settling at these times?
  - What are the potential impacts of higher-dollar Same Day ACH debits settling at these times?

ODFIs:

- ODFIs would need to determine whether to offer higher dollar limits to Same Day ACH Originators.
  - Software updates may be needed for dollar threshold edits.

Anticipated Impacts

RDFIs:

- RDFIs should consider implementing tools and resources to identify and prepare for potential incoming late-day large dollar payments.
  - FedDetect Anomaly Notification from FedACH® Services can provide large-dollar alerts.
  - FedWire is open beyond the third Same Day ACH window, so an RDFI could arrange funding to cover an incoming transaction, if necessary.

ACH Operators:

- ACH Operators will need to update functional edits for an increase in the transaction limit for Same Day ACH Entries.

Same Day ACH and Risk Management

Nacha occasionally surveys financial institutions about Same Day ACH and risk management.

In the most recent survey following the March 2022 dollar limit increase, no financial institutions responded that they had experienced an increase in fraud that is directly attributable to the increase in the Same Day ACH dollar limit.

- All the responding financial institutions allowed their ACH origination clients to originate Same Day ACH payments up to the $1,000,000 limit.
- Ninety percent said they have clients who, as a normal part of their business, regularly initiate transactions above the previous $100,000 limit.
- From the RDFI perspective, over 80% are receiving SDA transactions over the prior limit of $100,000 on a common or daily basis.

A financial institution might consider reassessing some customers' credit limits in light of higher Same Day ACH limits.

Proposed and Approved Effective Dates

Effective Date	Rule Amendments
March 20, 2026	• **Fraud Monitoring by ODFIs** • **Fraud Monitoring by large Originators, TPSPs, and TPSs (Phase 1)** • **ACH Credit Monitoring by large RDFIs (Phase 1)** • **New Company Entry Descriptions – PAYROLL and PURCHASE**
June 22, 2026	• **Fraud Monitoring by all other Originators, TPSP, and TPS** • **ACH Credit Monitoring by all other RDFIs**
September 18, 2026	• **Definition of IAT Entries** • **Funds Availability Requirements for Non-Same-Day Credit Entries**
January 1, 2027	• **Registration of IAT Contacts in the ACH Contact Registry**
March 19, 2027	• **Optional Date of Birth Field for IAT Entries** • **Non-Bank Foreign Financial Agencies in IAT Entries** • *Increase the Same Day ACH Dollar Limit to $10M*
March 17, 2028	• **New Return Reason Code (R90) for Sanctions Compliance Obligations**

The chart shows the *proposed* effective date in relation to approved Rules going into effect in 2026-2028.

The proposed rule appears in *italics*, approved rules in **bold**.

Other General Feedback Requested

Nacha also seeks general comment on:

- Respondent’s role in the ACH Network.
- Overall agreement with proposal objectives.
- Impact of the proposal to participants, including origination, technical, operational, and receipt.
- Implementation effort and proposed effective date.

Responses to the Request for Comment are due by **Thursday, December 18, 2025.**