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November 9, 2015

To: Chief Executive Officers  
Providers of ACH and Demand Deposit Account Processing Services to Financial Institutions; and  
Providers of Treasury Management and Accounts Payable and Receivable Services to Business Users of ACH

From: Janet O. Estep  
President and Chief Executive Officer  
NACHA – The Electronic Payments Association

Re: Same Day ACH Implementation and Readiness

I am writing to bring to your attention to the upcoming implementation of Same Day ACH, and ask that you ensure that your organization is supporting the readiness of all your clients. Specifically, I am asking that you:

- **Work proactively with all of your clients to be ready for Same Day ACH credits by September 23, 2016.**
- **Understand the three distinct Same Day ACH implementation phases (see box below), and plan for each with your clients.**

Same Day ACH becomes a reality on September 23, 2016. As a provider of ACH-related software and processing services to financial institutions and/or business users of ACH, your clients will be relying on you to be ready for Same Day ACH on this “go-live” date.

On this date, users of ACH may begin sending same-day ACH credit payments<sup>1</sup>, and both ACH Operators will begin delivering same-day ACH credit payments to receiving depository financial institutions twice each banking day.

**It is mandatory for all depository financial institutions to be ready to receive Same Day ACH credit transactions beginning on September 23, 2016. All service providers to receiving institutions should support their clients’ readiness to receive these transactions by this date, including through education and testing in advance of the go-live date.**

As of the go-live date, RDFIs will need to make funds from same-day ACH credit transactions available in their customers’ accounts no later than the end of the processing of transactions for that settlement date. For example, if an RDFI finishes processing all credits and debits to its DDAs for the settlement date of Thursday, November 5, 2015 by 11:00 p.m., then the funds from same-day ACH credits must be available by 11:00 p.m. RDFIs may make funds available earlier; the time in this example represents the deadline by which funds availability must be completed.

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<sup>1</sup> As permitted and provided for by each customer’s Originating Depository Financial Institution (ODFI).

Also as of the go-live date, business receivers of same-day ACH credits will need to provide credit to payers as of the settlement date. For example, if a consumer makes a bill payment to a billing company on Thursday, November 5, 2015 using a same-day ACH credit, then the billing company needs to credit that consumer's account as of November 5. The billing company is allowed a reasonable amount of time to accomplish this; for example, it can update the consumer's account during the morning of the following business day.

For a period of approximately one year (through September 14, 2017), RDFIs will not receive same-day ACH debit transactions. However, all implementation plans should address the readiness to receive same-day ACH debits beginning on September 15, 2017, the date on which same-day ACH debits are allowed.

Finally, no later than March 16, 2018, all RDFIs must make funds from same-day ACH credits available in customers' accounts by 5:00 p.m. in the RDFI's local time. All implementation plans need to address how this function will be accomplished, as it is mandatory for all financial institutions. RDFIs may implement this capability earlier than March 16, 2018; the date represents the deadline by which this must be completed.

NACHA appreciates your organization's attention to this very important enhancement to the ACH Network. There are additional aspects and details of Same Day ACH and its implementation phases that all ACH Network participants and service providers should know. Complete information on Same Day ACH is available at <https://www.nacha.org/content/same-day-ach>.

Service providers are requested to contact NACHA's subject matter expert Amy Morris to report on implementation efforts and readiness. She can be reached at [amorris@nacha.org](mailto:amorris@nacha.org) or through 703-561-1100.

### **Same Day ACH Three Implementation Phases**

Phase 1 – Effective September 23, 2016 – Same-day ACH credits may be used. RDFIs should be ready to receive same-day ACH credits.

Phase 2 – Effective September 15, 2017 – Same-day ACH debits may be used. RDFIs should be ready to receive same-day ACH debits.

Phase 3 – Effective March 16, 2018 – Funds from same-day ACH credits must be made available by 5:00 p.m. in the RDFI's local time.