



Same Day ACH: Moving Payments Faster

\$25,000 Per-Transaction Limit Guidance **January 5, 2016**

The limit on large-dollar transactions (those ACH Entries over \$25,000) applies to individual transactions; i.e., a single Same-Day ACH transaction could not be for more than \$25,000. There is no similar limit on the aggregate value of a batch of Same-Day ACH transactions. Entries submitted in a same-day processing window that are over \$25,000 will not be rejected by the ACH Operator, but will be processed for next-day settlement in the next available processing window.

Transactions may not be restructured to evade the \$25,000 limit. For example, if a business has a loan payment of \$50,000 due, that payment would not be eligible for Same-Day ACH and should not be divided and sent as multiple same-day Entries in order to avoid the per-transaction dollar limit. However, if a business is paying multiple invoices from the same supplier that each amount to \$25,000 or less, each invoice could be paid using a distinct Same-Day ACH transaction. Originators should be educated to avoid attempts at structuring Entries in order to evade the per-transaction dollar limit. Since evasion can be a very fact specific inquiry, NACHA will consider evasion issues on a case-by-case basis.

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