

2026 Nacha Fraud Monitoring

The 2026 Nacha Operating Rules & Guidelines introduce risk-based fraud monitoring requirements for ODFIs, Originators, Third-Party Service Providers, Third-Party Senders, and RDFIs, that was effective in two phases: March 20 and June 22, 2026.

Use this checklist to help gauge your institution's readiness.

Step 1: Identify Exposure Through Risk Assessment

- ☐ Confirm which Nacha rule category applies to your institution (ODFI, Originator, TPSP, TPS, and/or RDFI)
- ☐ Conduct a fraud risk assessment differentiating higher-risk from lower-risk ACH transaction types and activities
- ☐ Verify existing non-consumer originators, third-party service providers, and third party senders have implemented risk based fraud monitoring processes



Step 2: Assess Potential Gaps in Current Fraud Monitoring Controls

- ☐ Confirm written program has been updated to reflect the new "risk-based" standard.
- ☐ Verify ODFI fraud detection processes cover credit entries, not just debits
- ☐ Verify RDFI fraud detection processes cover inbound ACH credit entries
- ☐ Verify fraud detection controls are in place such as SEC code/account type matching, dollar tolerances, name matching, and behavioral pattern recognition.
- ☐ Evaluate pre-processing vs. post-processing monitoring capabilities and associated batch-processing risk
- ☐ Validate systems utilize the required Company Entry Descriptions for PAYROLL and PURCHASE
- ☐ Establish R17 ("Questionable") return tracking and Originator follow-up procedures



Step 3: Develop a Roadmap for Implementation

- ☐ Provide training and resources to your originators regarding various fraud types, the Fraud Monitoring Rule requirements, and actions they can consider to help them comply
- ☐ Document the basis for any reliance on fraud monitoring performed by other parties in the transaction chain
- ☐ Update ACH Origination Agreements to address Fraud Monitoring requirements and the basis for any reliance the ODFI will have on the Originators Fraud Monitoring procedures
- ☐ Establish a cadence for annual review of fraud monitoring processes and procedures
- ☐ Identify cross-departmental owners across treasury, operations, compliance, and fraud teams



Step 4: Update Policies, Procedures, and Processes

- ☐ Update onboarding due diligence process for commercial originators, third party service providers and third party senders to verify fraud monitoring procedures in place prior to onboarding.
- ☐ Document final policies and procedures and confirmed sign-off from compliance and risk stakeholders



Need help closing the gaps?

Kaufman Rossin's Risk Advisory Services team helps financial institutions run risk assessments, close monitoring gaps, and build compliant fraud detection programs.

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