

Same Day ACH: Moving Payments Faster

RDFIs - End of Processing Day Guidance January 5, 2016

During Phases 1 and 2 of Same-Day ACH (September 23, 2016 through March 15, 2018), an RDFI is required to make funds available from a Same-Day ACH credit in its customer's account no later than the end of processing of transactions for that settlement date. While funds do not need to be available for cash withdrawal at that time (e.g., via an ATM), they must be available to satisfy other subsequent debit entries against the account (e.g., to pay ACH debits and checks).

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. on November 5, then the funds from a Same-Day ACH credit must be available in the Receiver's account by 11:00 p.m. on November 5 and must be available to satisfy subsequent debits (other than cash withdrawals) to the Receiver's account.

The Same-Day ACH availability requirement is a "no later than" deadline; RDFIs always have discretion to make funds available earlier. This includes flexibility to make decisions regarding availability based on the specific processing window during which Same-Day ACH transactions are received, or even on an account-by-account or transaction-specific basis, all within the individual RDFI's risk management framework. Similarly, RDFIs are not required to make funds available for withdrawal (such as from an ATM or teller window) in the end-of-day processing cycle as part of Phases 1 and 2, but they may choose to do so in their own discretion, including on an account-by-account or transaction-specific basis.

The information contained within this document is an informal interpretation intended to provide general guidance by NACHA staff in interpreting the *NACHA Operating Rules*. The interpretation is not an official position of NACHA and is not binding on NACHA staff, the NACHA Board or any ACH Rules Enforcement Panel. All applications of the *NACHA Operating Rules* are subject to facts and circumstances of the specific case. Readers of this document should obtain their own legal advice regarding their obligations under the *NACHA Operating Rules* or applicable legal requirements.