ValidiFI

Nacha Fraud Rules for ACH Fraud Detection & Risk Management

Implementation and Considerations Guide

Nacha 2026 Fraud Risk Implementation and Considerations Guide:

This resource is designed for Originating Depository Financial Institutions (ODFIs) and Receiving Depository Financial Institutions (RDFIs) seeking clarity, actionable steps, and best practices to achieve compliance and strengthen fraud defenses.

Nacha's new rules go beyond "check-the-box" compliance. They require proactive, documented, and risk-based fraud monitoring for all ACH participants.

Whether you're building a program from the ground up or enhancing existing controls, this guide highlights key considerations, evaluation points, and best practices to support your compliance journey.

Implementation Considerations

For Originators, Third-Parties, and ODFIs

Start with Risk Assessment:

- Identify high-risk accounts and suspicious or irregular transaction patterns

Evaluate and Expand to assess:

- Volume and value anomalies
- Velocity changes in account ownership / PII
- New accounts
- Return monitoring and analysis
- Overpayment detection

Review Contracts & ACH Origination Agreements:

- Make sure roles and responsibilities are clearly defined
- Include fraud monitoring as part of vendor/customer oversight

Compliance Best Practices

For Originators, Third-Parties, and ODFIs

As a Nacha preferred partner, ValidiFI recommends a tiered approach:

- Evaluate Existing Accounts:
  - Objective: stop abusive accounts and prevent unauthorized payments
    - Analyze and identify high-risk accounts already in your system
    - Using a one-time screening for identified suspicious behavior and fraud signals

- Establish a Baseline with New Accounts:
  - Objective: stop fraud accounts before processing (recommended, not required by the rule)
    - Analyze the first use of bank accounts with no prior history
    - Using a one-time validation of account status and ownership

- Ensure Ongoing Monitoring:
  - Objective: detect mule accounts, scams, and evolving fraud patterns
    - Analyze accounts flagged as high-risk (may change over time)
    - Proactive assessment on a recurring basis (daily to bi-annually)

Implementation Considerations

For RDFIs

Assess Activity & determine risk levels based on:

- Account type (consumer vs. business)
- Seasoned vs. new accounts
- Dormant accounts suddenly active

Review Funds Availability Policies:

- Offer early availability only after account history is established
- Limit early availability to specific transaction types (e.g., payroll, Social Security)

Establish an Appropriate Monitoring Frequency:

- Daily, weekly, or monthly based on risk

Schedule Follow-Up Actions:

- Based on FI policies, account agreements, and regulatory obligations

Compliance Best Practices

for RDFIs

ValidiFI recommends a tiered approach:

Evaluate Existing Accounts:

- Objective: flag abnormal transaction history for deeper review
  - Analyze and identify high-risk accounts
  - Use a one-time external evaluation for suspicious behavior and fraud signals

Establish a Baseline with New Account Openings:

- Objective: prevent fraudulent accounts from entering the system
  - Analyze external accounts used to fund new internal accounts
  - Authenticate ownership and verify identity at onboarding

Ensure Ongoing Monitoring:

- Objective: Detect mule accounts, scams, and fraud payments
  - Analyze accounts flagged as high-risk
  - Proactive assessment on a recurring basis (weekly/monthly/bi-monthly)

ValidiFI > Compliance

Meeting Nacha's 2026 Fraud Monitoring Rule is essential—but it's only the starting point. Compliance alone doesn't stop fraud. ValidiFI helps you go further. Don't just verify it, ValidiFI It!

Comprehensive Solutions

Leverage a layered, risk-based approach to account validation and fraud prevention. With **vAccount**, **vFraud**, and step-up authentication tools (**vAuth** & **vConnect**), we provide a comprehensive solution that scales with your business needs

Behavioral Intelligence & Proprietary Data

Move beyond static checks with dynamic insights from ValidiFI's collaborative network—powered by 1.4B inquiries, 57M consumers, and 63M accounts—to stay ahead of evolving fraud patterns.

End-to-End Risk Management

ValidiFI provides end-to-end protection for your payments ecosystem—from account validation to ongoing monitoring—with scalable, risk-based solutions tailored to your unique use cases.

Need Help?

Compliance isn't optional—and neither is protecting your institution from evolving fraud threats.

ValidiFI makes it simple to stay ahead:

- Risk-based monitoring made easy
- Implement Nacha-compliant processes without slowing down operations
- Scalable solutions for both ODFIs & RDFIs

From account validation to ongoing monitoring, ValidiFI helps you meet compliance and reduce fraud losses.

✓ Download our guide: Compliance Rule Changes and Definitions
✓ Schedule a Fraud Strategy Consultation
✓ Learn more at www.validifi.com

Still have questions or need additional guidance? Contact us at https://validifi.com/contact/

Ensure confidence, trust, and transparency in every transaction

Don’t just verify it, ValidiFI It!

Still need help or have questions? Schedule a Fraud Strategy Consultation

Turn compliance into competitive edge. Discover how at www.validifi.com