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June 15, 2016

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

Same Day ACH becomes a reality on September 23, 2016, just 100 days away. On this "go-live" date, users of ACH may begin sending same-day ACH credit payments<sup>1</sup>. I am writing again to ask that you ensure that your organization is continuing to support the readiness of all your clients. Specifically, I am asking that you:

- Provide resources for client testing and implementation needs for sending or receiving same-day ACH credits;
- Confirm that communication has been established with all of your clients explaining steps necessary to be ready to send or receive same-day ACH credits.

All depository financial institutions must 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.

Users of the ACH Network should understand that ACH transactions need to be dated correctly in order to be processed accurately. All ACH users should verify their ability to date transactions correctly, regardless of whether or not they intend to use Same Day ACH.

Both financial institutions and business ACH users also are counting on service providers to support the origination of ACH – being able to create and send same-day ACH payments. Although many service providers have announced their support, others have not made known their plans for providing these services. We ask all service providers to communicate their plans to their clients for supporting the origination of same-day ACH payments.

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

Lastly, business payees that receive 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 Monday, September 26 using a same-day ACH credit, then the billing company needs to credit that consumer's account as of September 26. 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, back-dating the payment. Another option for meeting this requirement may be to receive additional files from the billing company's financial institution, enabling later-day posting runs.

NACHA appreciates your organization's attention to this very important enhancement to the ACH Network. Service providers are requested to use NACHA's Same Day ACH Resource web page for additional resources to assist in this critical implementation (<a href="https://resourcecenter.nacha.org/">https://resourcecenter.nacha.org/</a>). Both ACH Operators will also support managed testing for vendors and customers in the remaining time prior to implementation.

Please contact NACHA's subject matter expert Amy Morris on implementation efforts and readiness. She can be reached at <a href="mailto:amorris@nacha.org">amorris@nacha.org</a> or through 703-561-1100.

Very sincerely,

Janet Estep

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.