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CRITICAL ACH PAYMENT SECURITY

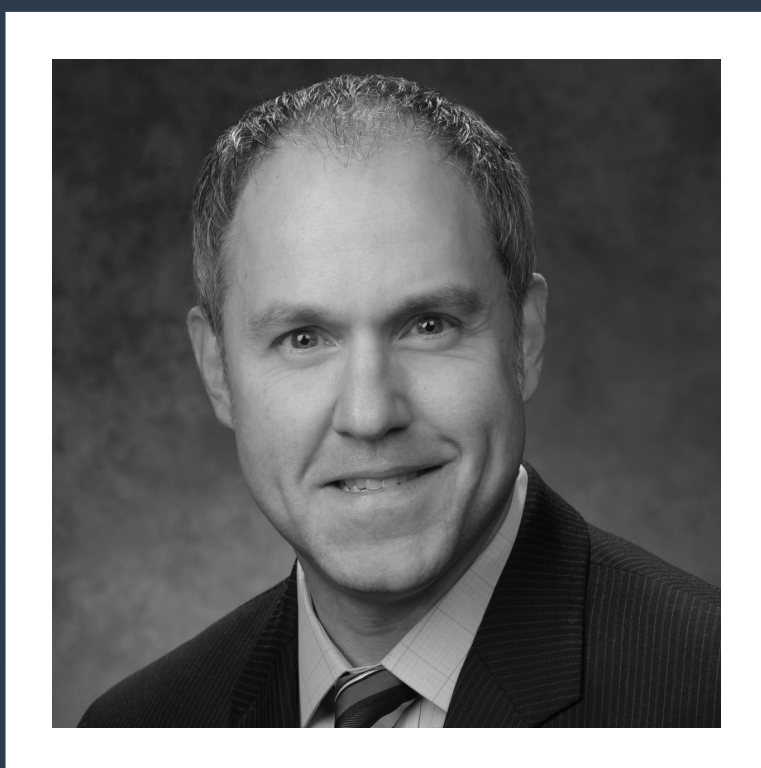


October 22, 2026

Live and Recorded for On-Demand Viewing

MEET THE SPEAKERS

THE EXPERIENCE BEHIND THE INSIGHTS



PAUL GALLOWAY

Paul Galloway has extensive experience in investment research and decision making, complex modeling, and risk management. He is known for leading teams of professionals, providing solutions to complex problems, building relationships with business leaders, and coming alongside others to help them achieve their goals.



CRAIG JEFFERY

Craig Jeffery's 30+ years of financial and treasury experience as a practitioner and as a consultant have uniquely qualified him to help organizations craft realistic goals and achieve significant benefits quickly. He formed Strategic Treasurer in 2004 to provide treasury and financial process assistance to corporate, educational, and government entities.

TOPICS OF DISCUSSION

KEY AREAS OF FOCUS AND ANALYSIS

ACH SECURITY REQUIREMENTS

Expanded scope and
expectations

RISK-BASED FRAMEWORK

Creating, assessing, and
applying the approach

READINESS IN PRACTICE

Reported preparedness
versus detailed
requirements

ASSESSMENT AND OVERSIGHT

Annual reviews and
documented controls

BANK OUTREACH AND REVIEWS

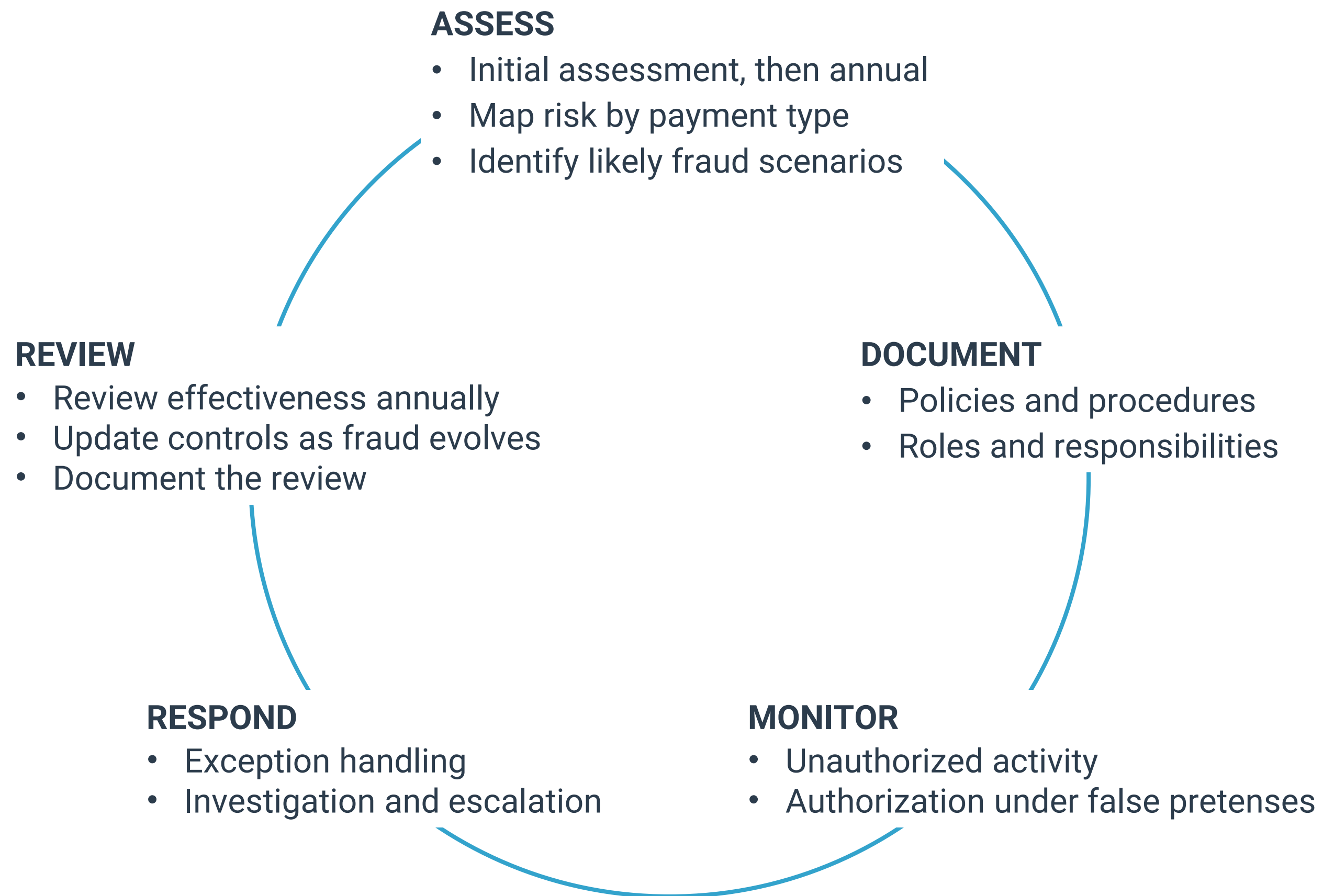
What ACH originators
should expect

KEY TAKEAWAYS

Final thoughts

ACH SECURITY IS A CYCLE

ONGOING REVIEW KEEPS CONTROLS ALIGNED WITH RISK



THE SCOPE HAS EXPANDED

MORE ORIGINATORS AND ACH ACTIVITY NOW REQUIRE MONITORING



WHO: All non-consumer originators

- Organizations of every size
- Third parties originating on their behalf



WHAT: ACH credits (push) and debits (pull)

- Coverage extends beyond WEB debits
- Micro-entries are no longer the boundary



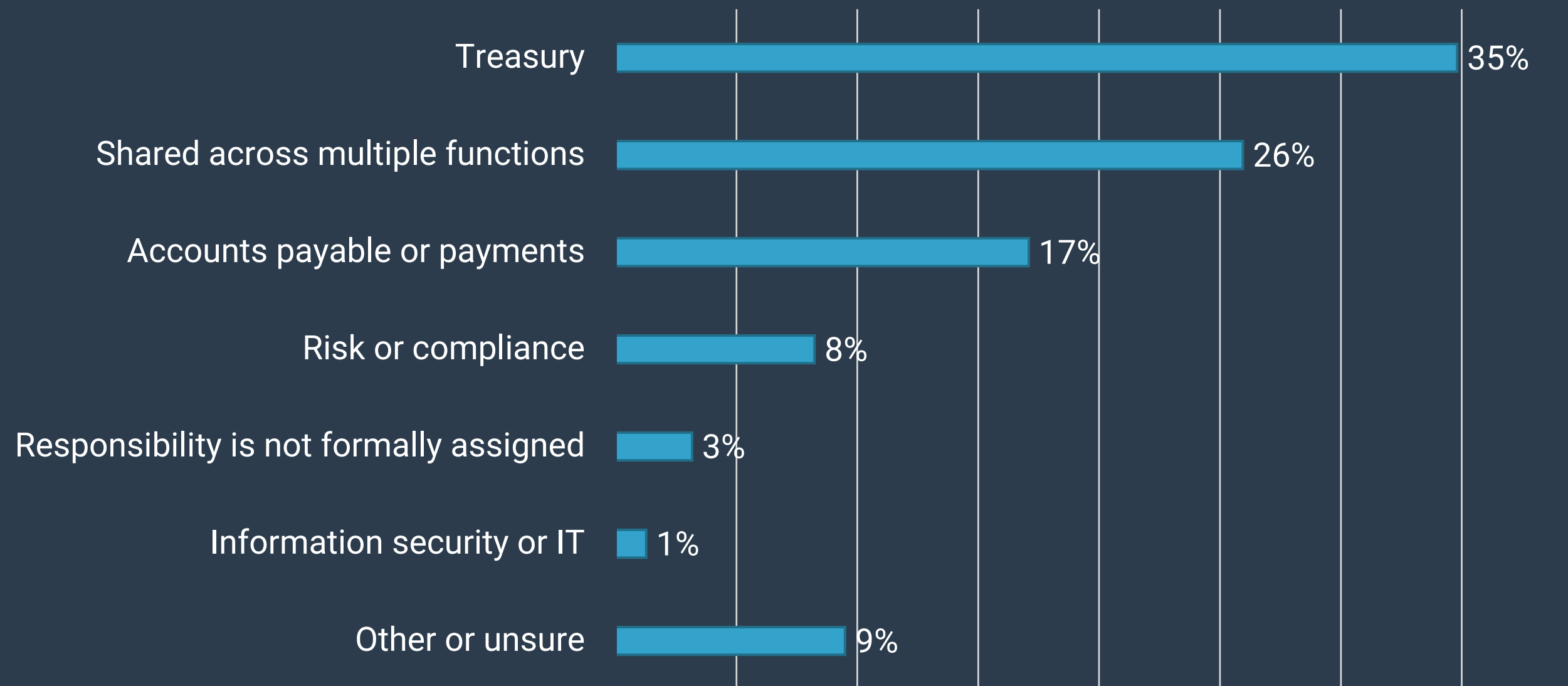
HOW: Risk-based processes

- Designed to identify fraudulently initiated entries
- Scaled to the organization's risks and operations



POLL QUESTION

Poll 1 - Who has primary responsibility for ACH fraud risk management in your organization?



RISK-BASED FRAMEWORK

CREATE, ASSESS, AND APPLY

1

CREATE A WRITTEN FRAMEWORK

- Document risks, controls, ownership, and response procedures

2

ASSESS THE FRAMEWORK ANNUALLY

- Account validation
- Incident response
- Third-party due diligence
- Staff training
- Fraud monitoring

3

APPLY THE FRAMEWORK

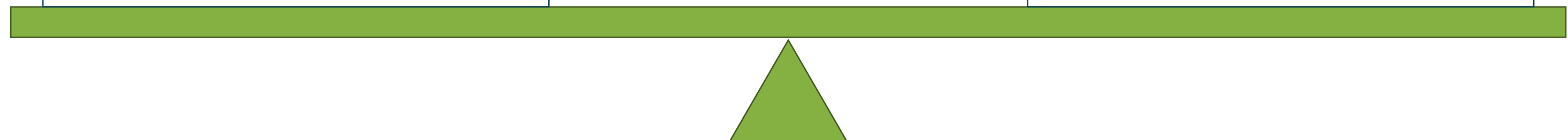
- Balance controls to the organization's exposure

ACH EXPOSURE

- Payment volume
- Transaction value
- Payment types
- Third-party involvement
- Process complexity

PROPORTIONATE CONTROLS

- Defined ownership
- Dual approval
- Transaction thresholds
- Anomaly detection
- Escalation procedures



ORGANIZATIONAL READINESS

ONLY 16% REPORT FULL READINESS

» Which of the following options best reflects your organization's readiness for the 2026 ACH requirements?

Not aware. We were not aware of these requirements or are unsure whether they apply to our organization.

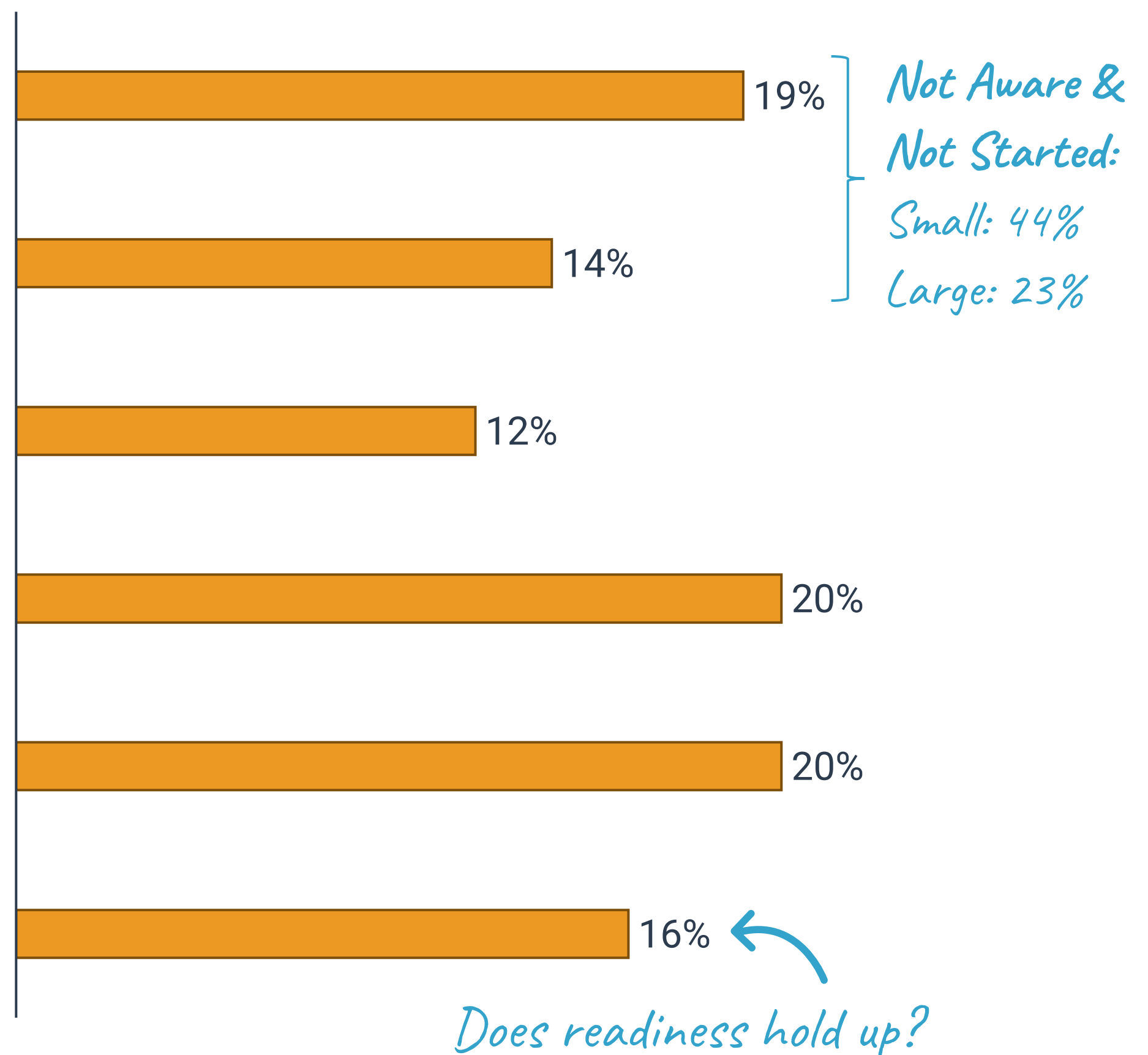
Not started. We are aware of the requirements but haven't started planning or implementation yet.

Planning. We have started planning, but most of the work remains to be done.

In progress. We have completed our planning and begun implementing the necessary policies, processes, or controls. More work remains.

Mostly ready. We have implemented most requirements, with some remaining work to complete.

Ready. We have completed the necessary work and are confident we meet the requirements.

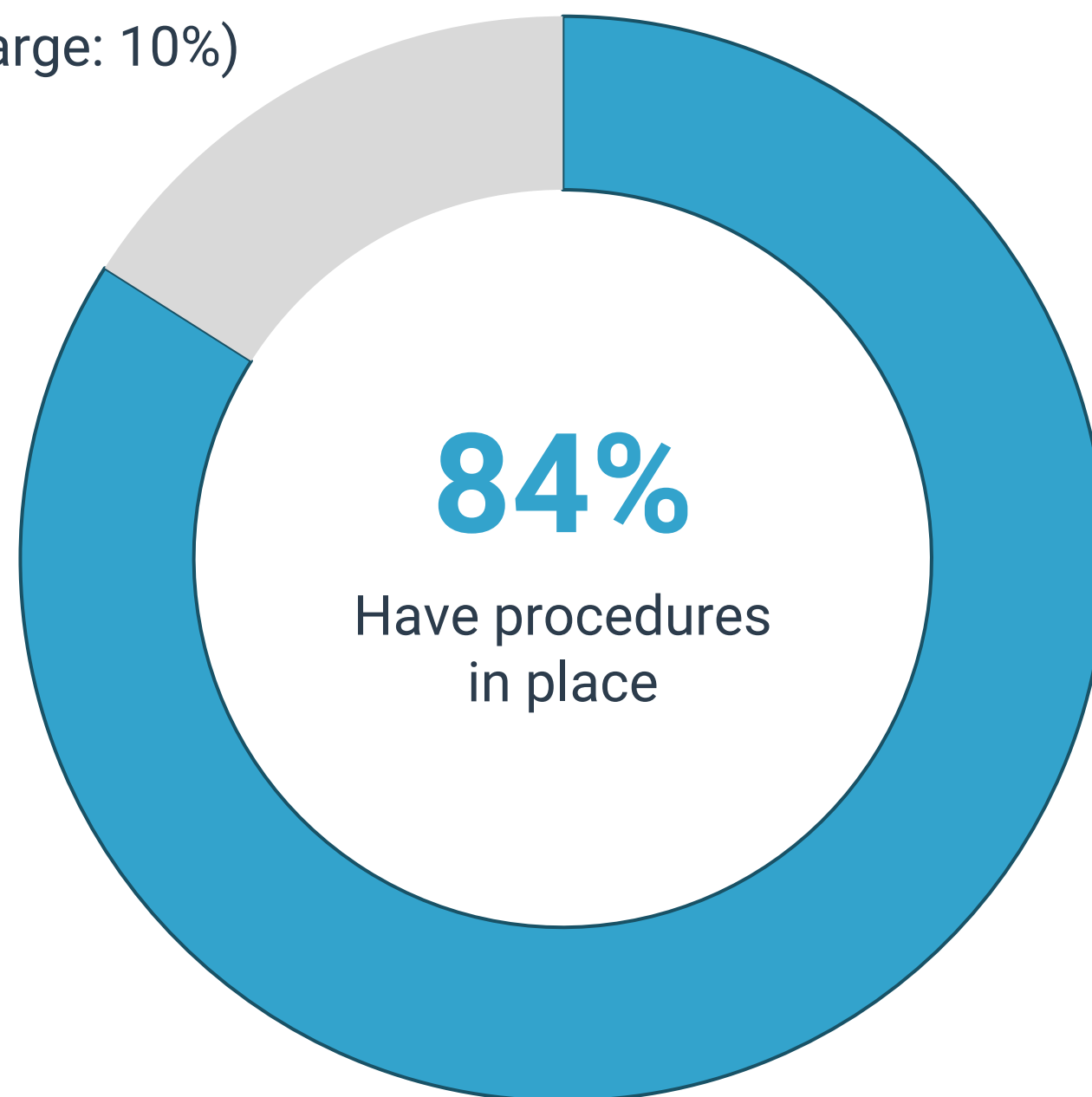


VALIDATION IS WIDESPREAD

MOST ORGANIZATIONS REPORT ESTABLISHED PROCEDURES

» Corporate: Does your organization have payee and account validation procedures for new or changed payment account or address information?

16%: No procedures or unsure
(Small: 23%, Large: 10%)



HOW PROCEDURES ARE PERFORMED
(Share of all respondents)



45%

Internally



30%

Combination of internal
and third-party



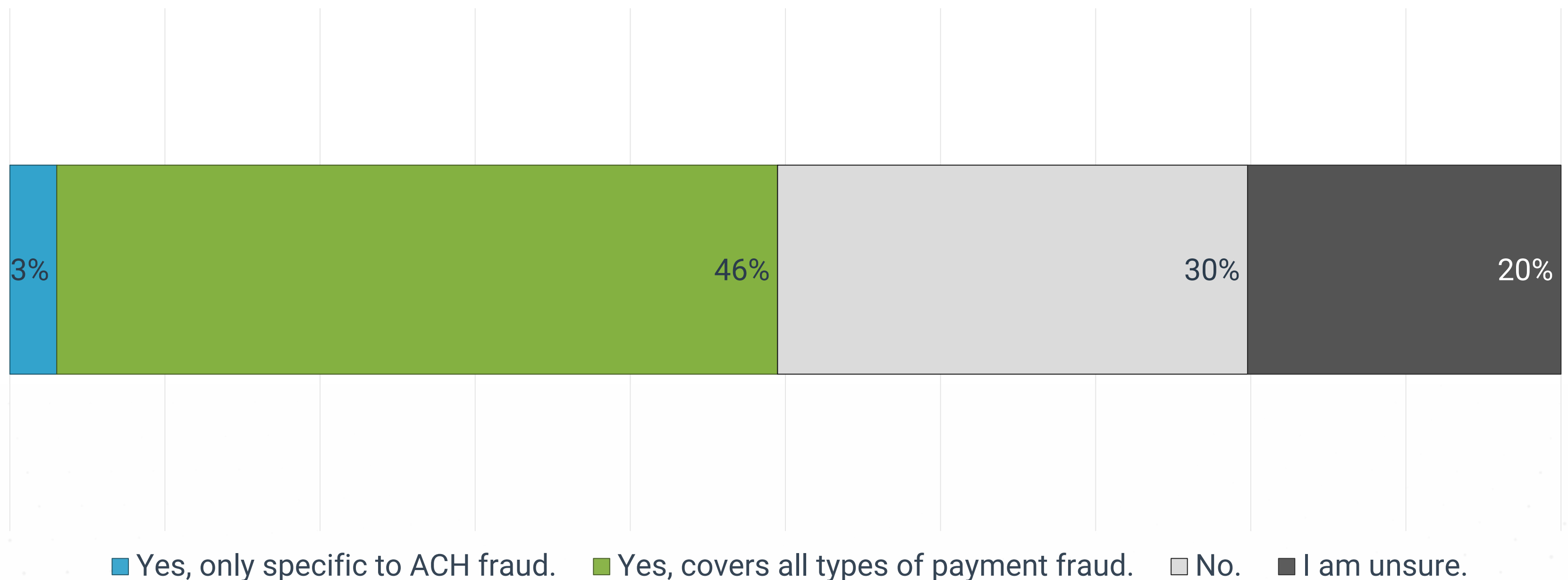
9%

Third-party provider

RESPONSE PLANNING IS A WEAK POINT

HALF LACK A WRITTEN PLAN OR ARE UNSURE ONE EXISTS

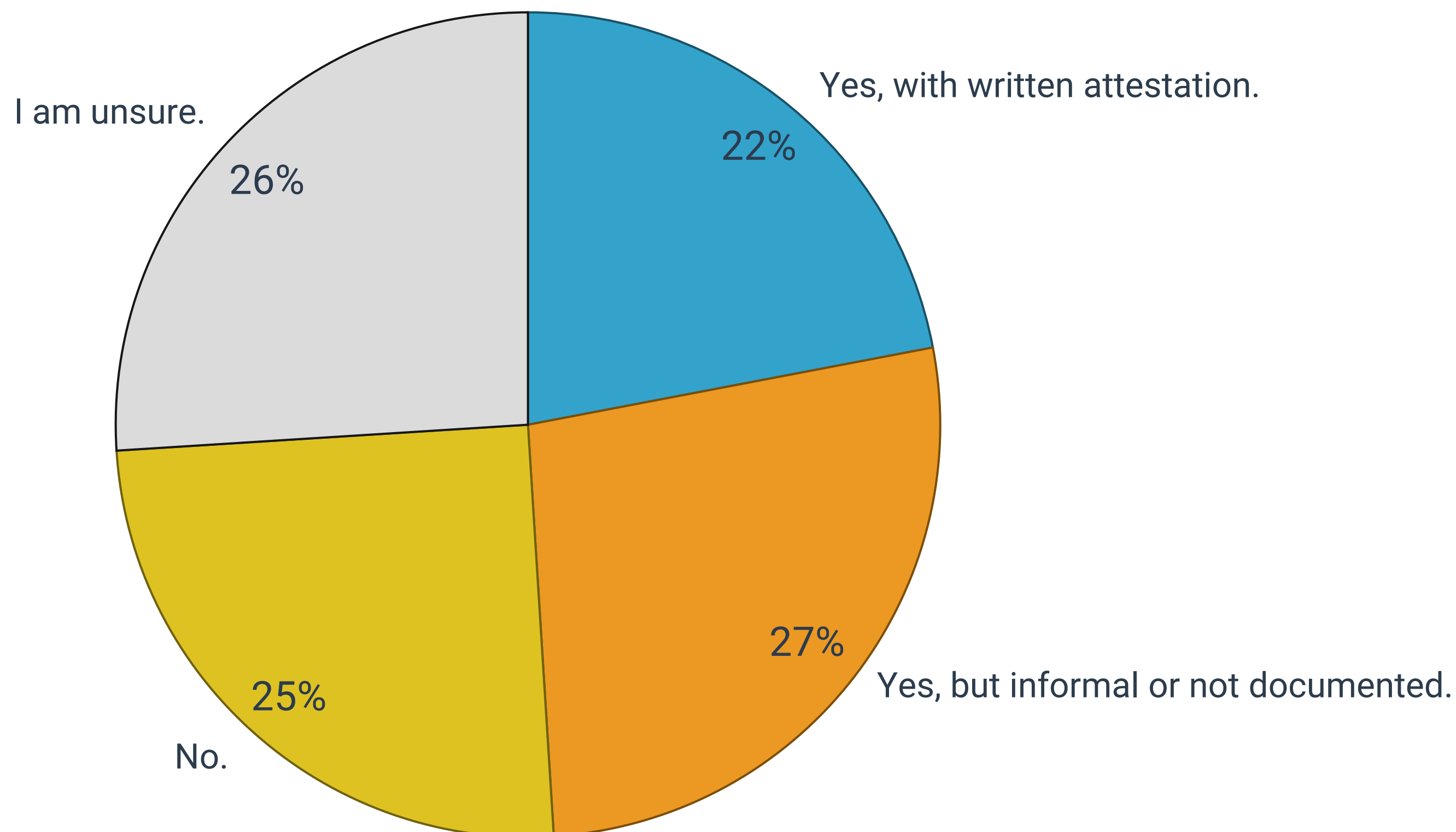
» Corporate: Does your organization have a formal, written Incident Response and Recovery Plan that addresses ACH fraud?



DUE DILIGENCE FALLS SHORT

FORMAL DOCUMENTATION IS THE EXCEPTION

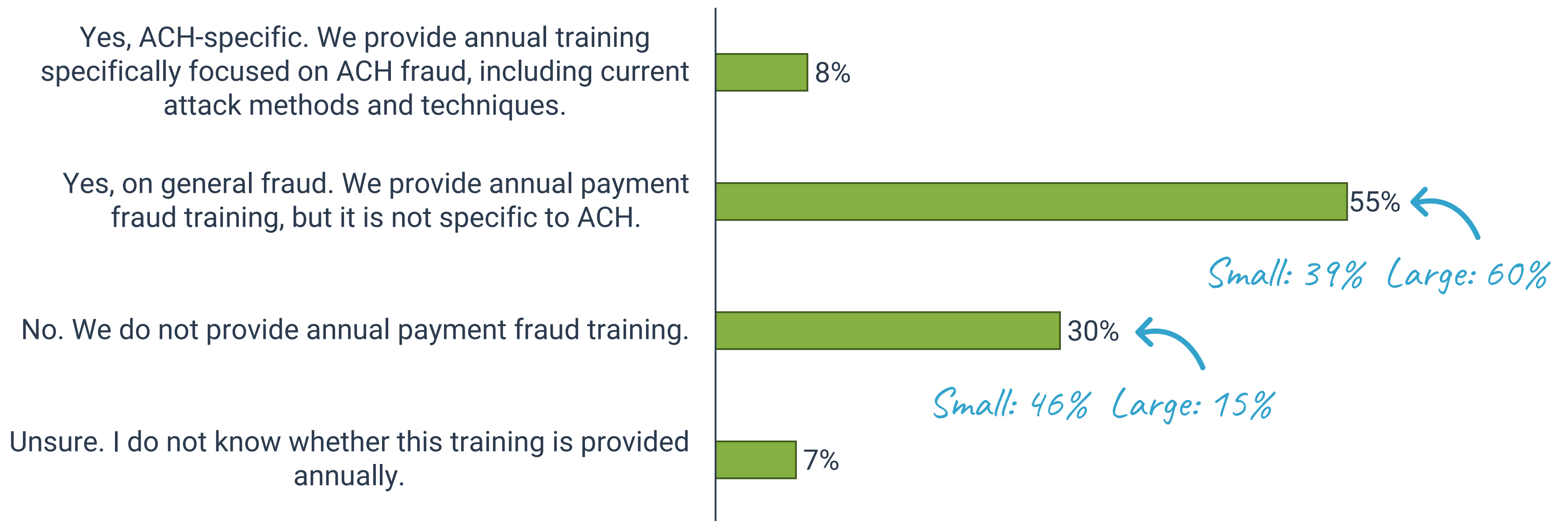
» Corporate: Has your organization performed due diligence regarding ACH compliance with any third-party originators (e.g., payroll, AP providers)?



ACH FRAUD TRAINING

REPORTED ACTIVITY VERSUS BANK-PERCEIVED READINESS

» Corporate: Does your organization provide annual training on ACH fraud to team members involved in ACH activity?

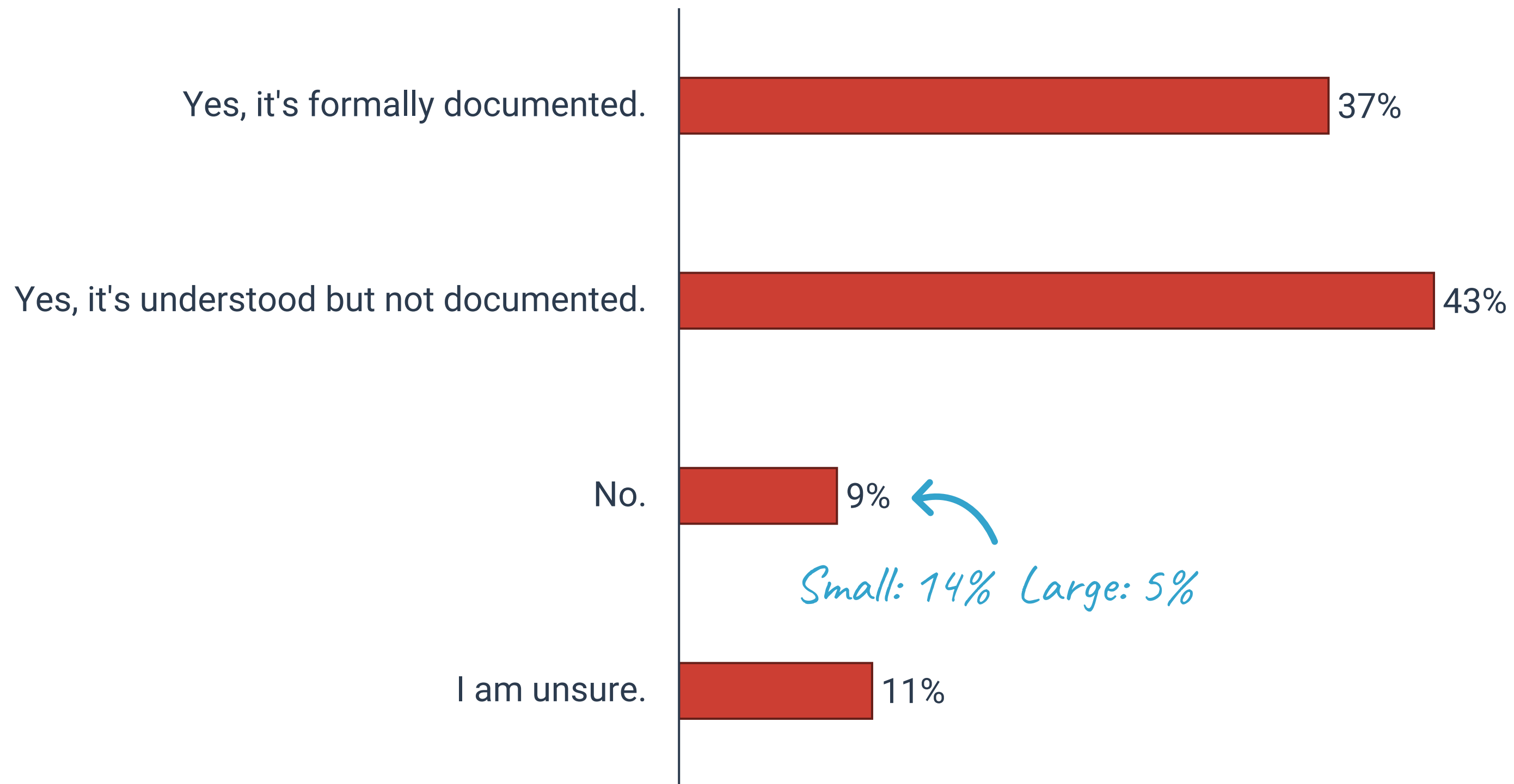


BANK PERSPECTIVE: 64% consider clients unprepared; only 21% consider clients prepared

MONITORING AND DETECTING

ACTIVITY AND FRAUD

» Corporate: Does your organization have a defined process for monitoring ACH activity and detecting potential ACH fraud?



READINESS NARROWS UNDER SCRUTINY

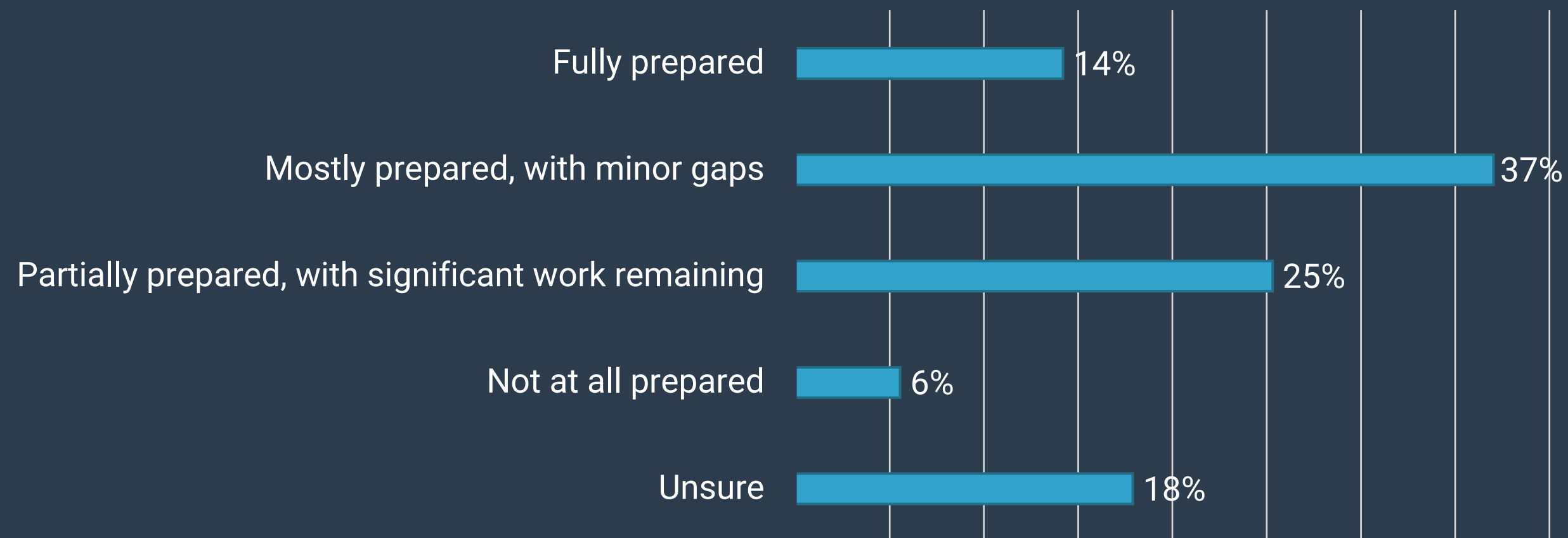
FEWER ORGANIZATIONS MEET EVERY SURVEYED INDICATOR



95% ARE UNPREPARED

POLL QUESTION

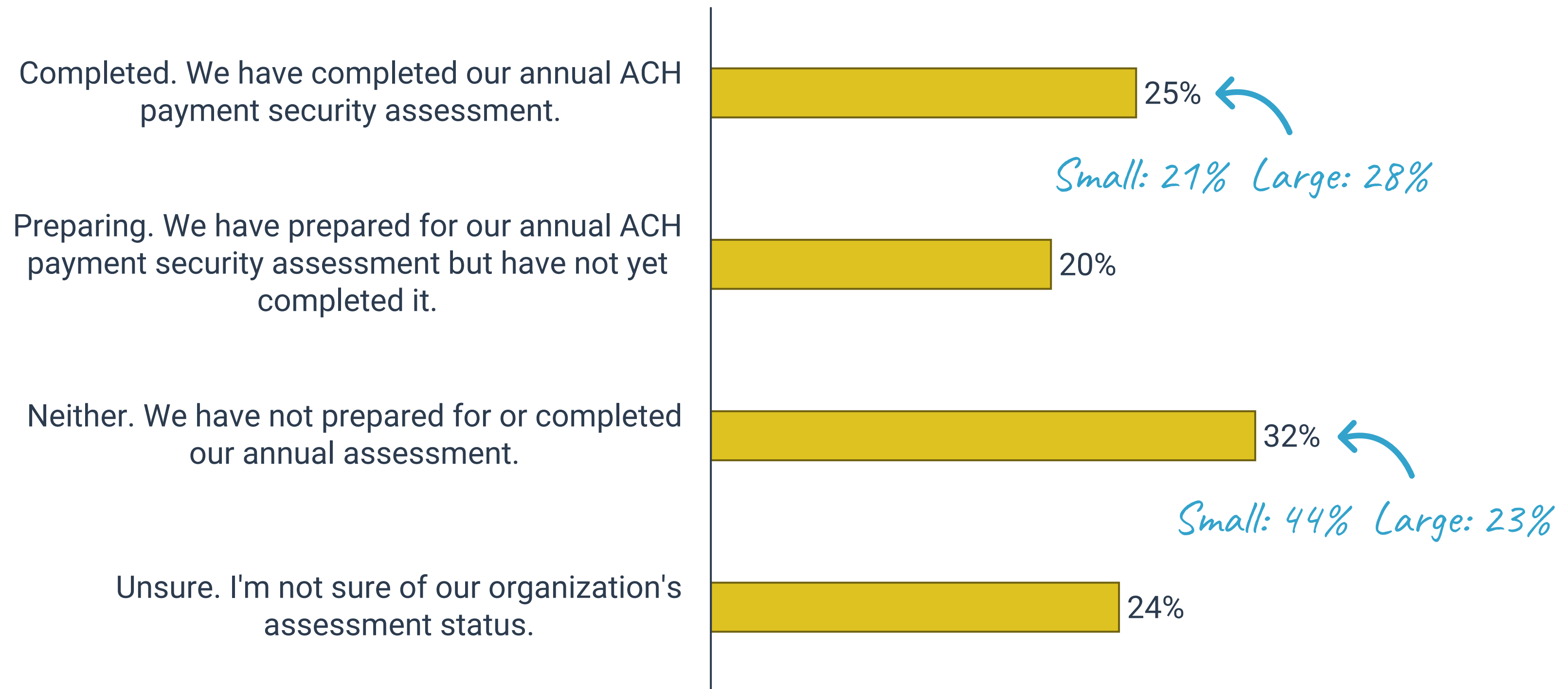
Poll 2 - After considering the specific ACH security requirements discussed today, how prepared is your organization?



PAYMENT SECURITY ASSESSMENT

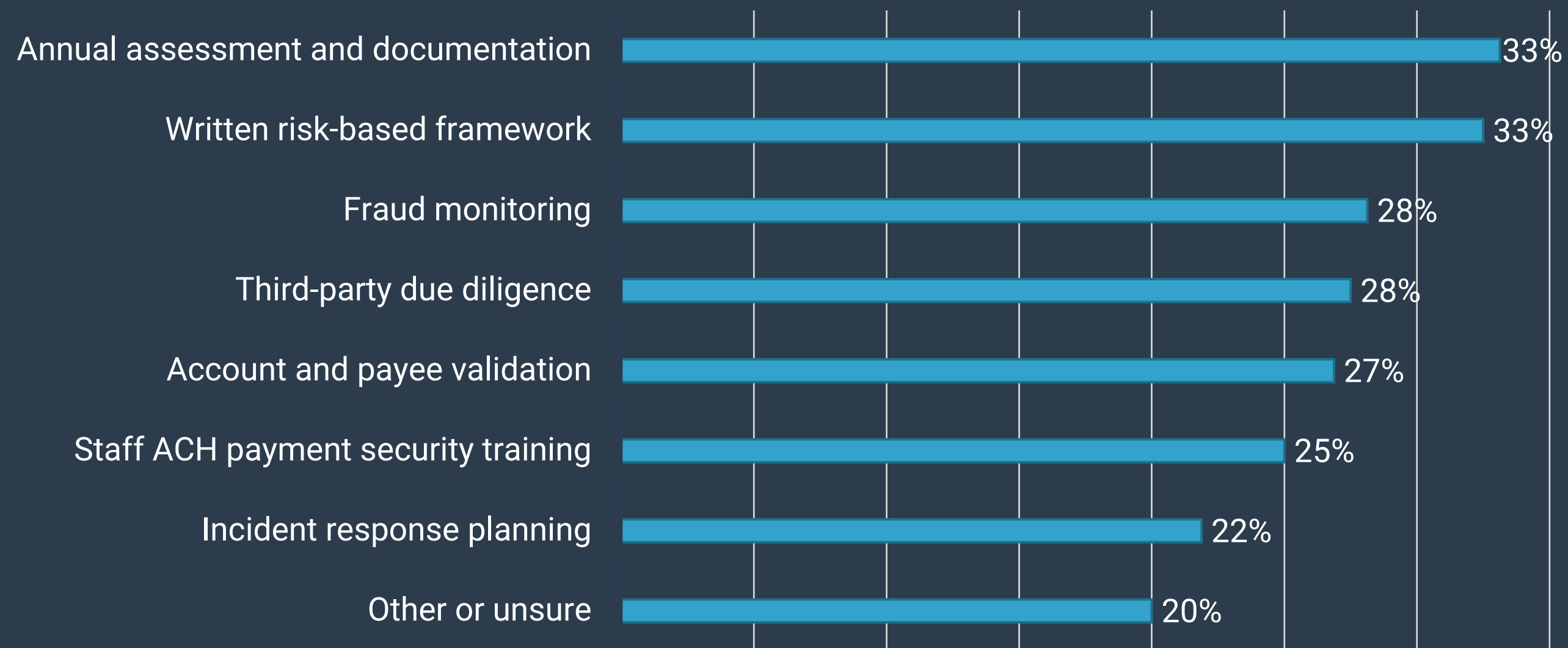
ONLY A QUARTER HAVE COMPLETED

» Corporate: Which of the following options best describes your organization's status with its ACH payment security assessment?



POLL QUESTION

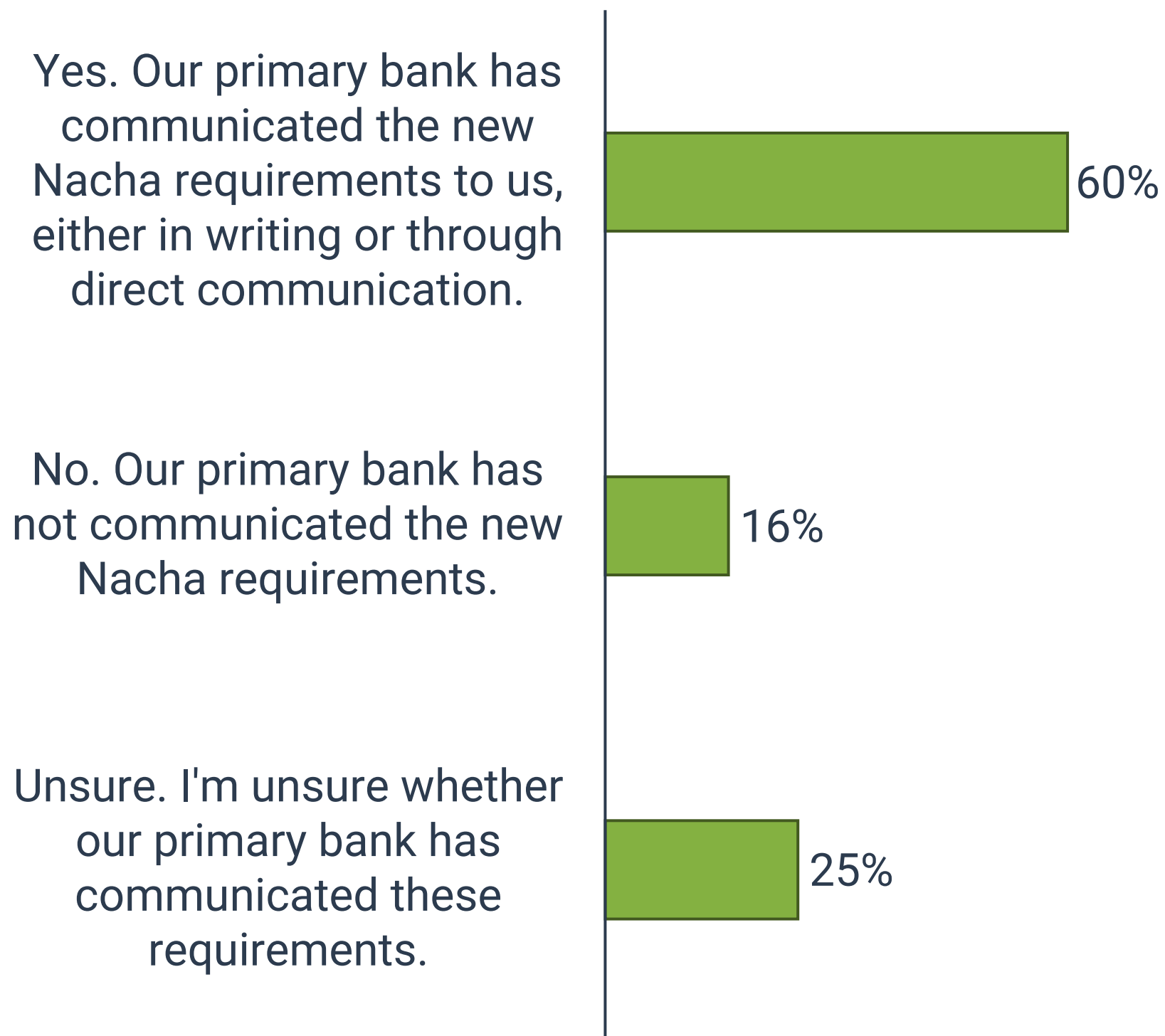
Poll 3 - Which areas present the greatest readiness gaps for your organization? (all that apply)



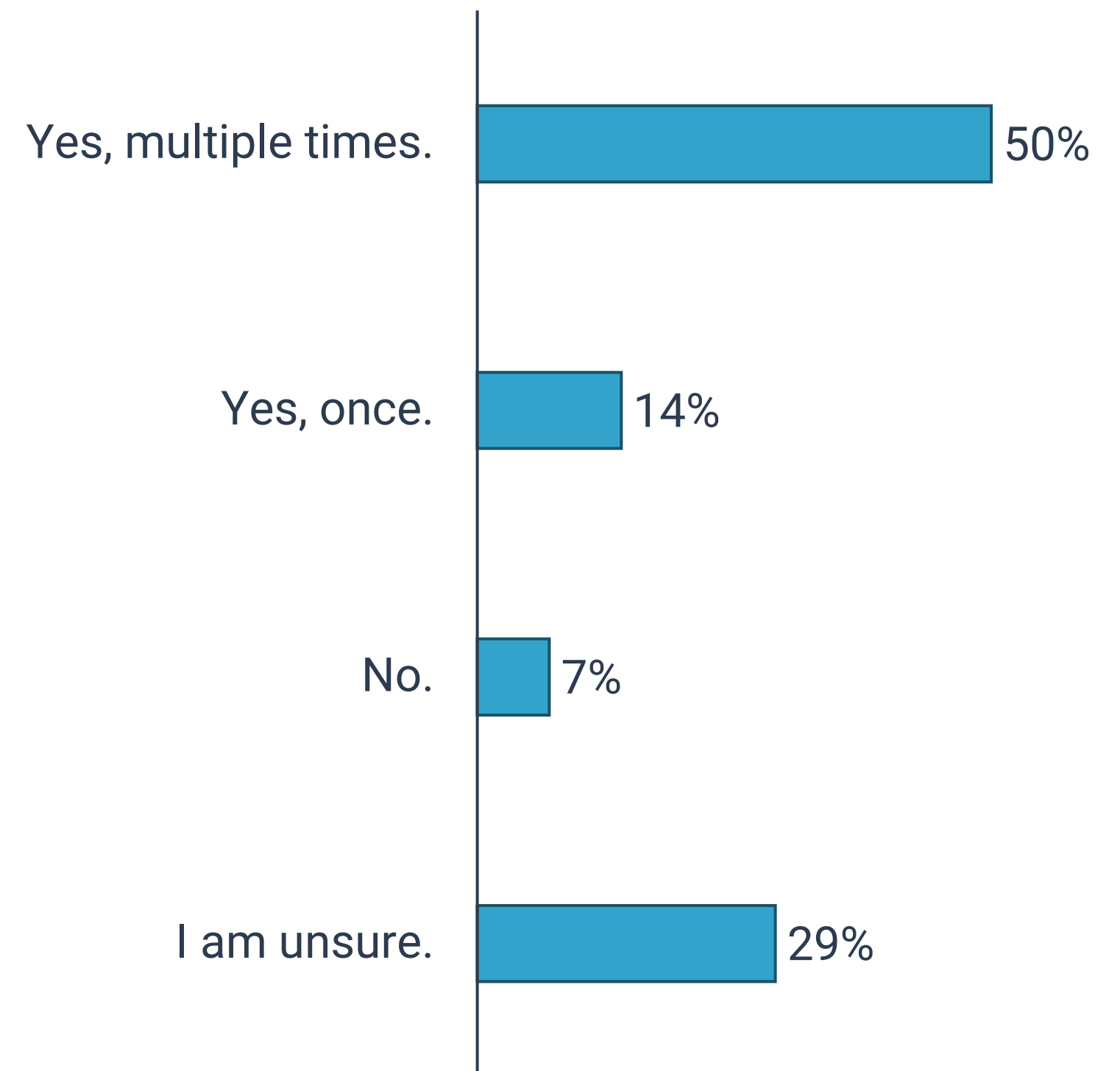
BANK COMMUNICATION

BOTH SIDES REPORT SIMILAR REACH AND UNCERTAINTY

» Corporate: Has your primary bank (the bank you use for ACH debits or credits) communicated the new Nacha requirements to your organization?



» Bank: Has your organization communicated the new ACH security requirements to its corporate and commercial clients?

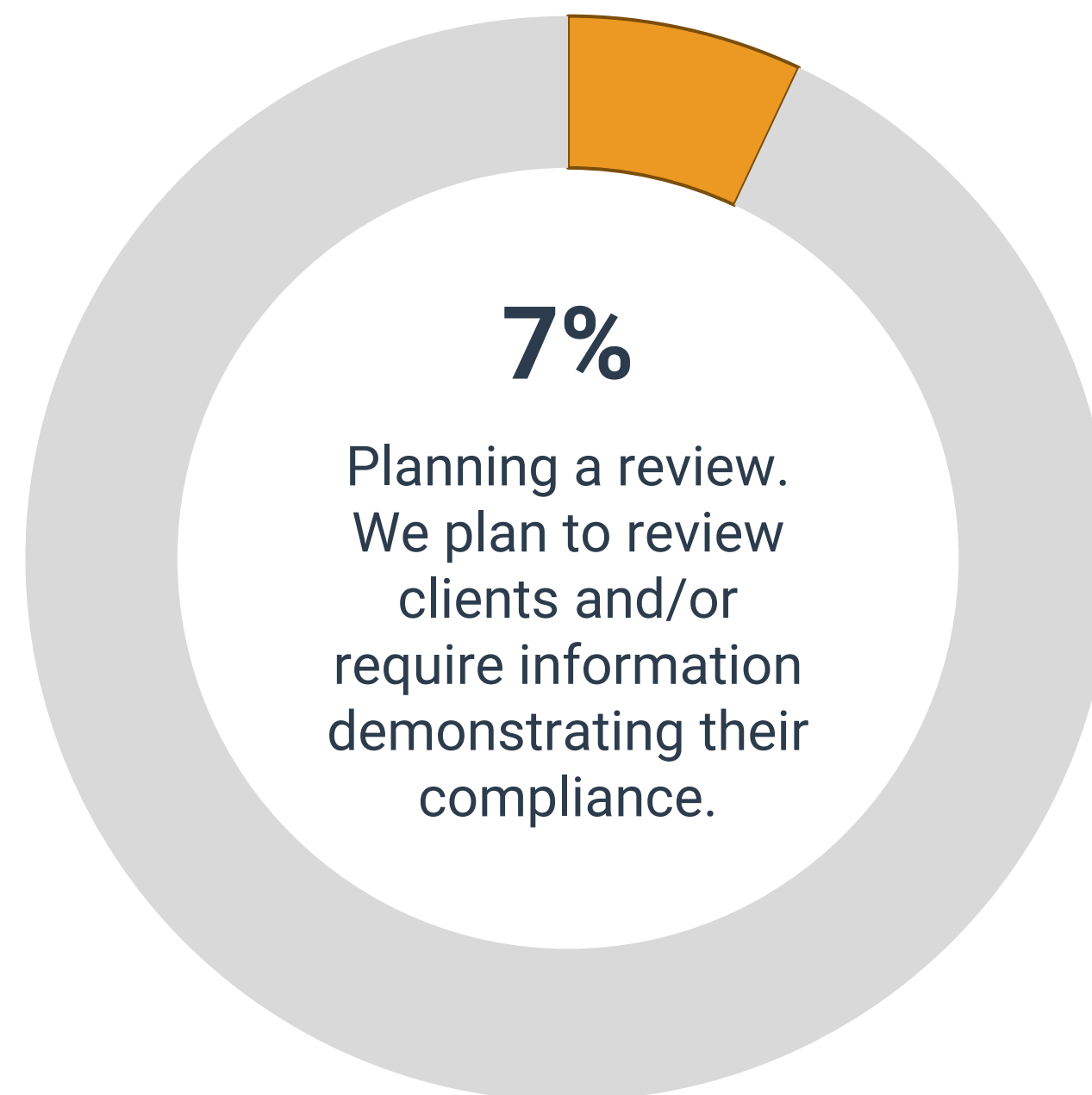


Note: Not all responses displayed

BANK REVIEWS HAVE BEGUN

ACH ORIGINATORS SHOULD PREPARE NOW

» Bank: Is your organization currently conducting or planning to conduct a review of corporate and commercial clients that originate ACH payments?



Note: Not all responses displayed

FINAL THOUGHTS

A QUICK RECAP BEFORE WE CLOSE

BUILD THE FRAMEWORK

- Document:
 - Risks
 - Controls
 - Ownership
 - Response procedures

TEST PERCEIVED READINESS

- Evaluate preparedness against specific requirements and practices

ADDRESS THE GAPS

- Prioritize:
 - Documentation
 - Training
 - Monitoring
 - Response
 - Third-party oversight

PREPARE FOR REVIEW

- Complete the annual assessment and maintain supporting evidence

CONNECT WITH US

FOR QUESTIONS OR TO LEARN MORE

STRATEGIC TREASURER

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Are Your ACH Payment Security Practices Ready for the New Requirements?

Nacha's new risk management rules place greater emphasis on identifying and managing ACH fraud risk. This checklist covers six key areas related to the risk-based framework and assessment requirements. While not exhaustive, it will help you evaluate your current practices, identify potential gaps, and determine where further action may be needed.

Do you have payee and account validation procedures for new or changed payment account or address information? ☐ Yes, specific to ACH ☐ No ☐ Unsure	Do you have a formal, written incident response and recovery plan that addresses ACH fraud? ☐ Yes, specific to ACH fraud or covering all payment fraud ☐ No ☐ Unsure	Have you performed due diligence regarding ACH compliance with any third-party originators? (e.g., payroll, AP providers) ☐ Yes, with written attestation ☐ Yes, but informal and not documented ☐ No ☐ Unsure
Do you provide annual training on ACH fraud to team members involved in ACH activity? ☐ Yes, specific to ACH fraud or covering all payment fraud ☐ No ☐ Unsure	Do you have a defined process for monitoring ACH activity and detecting potential ACH fraud? ☐ Yes, it's formally documented ☐ Yes, it's understood but not documented ☐ No ☐ Unsure	Have you documented your annual ACH risk-based assessment process formally? ☐ Yes ☐ No ☐ Unsure

If you have not selected the first checkbox for every question above, you may have further work to do to strengthen your ACH security practices.

Have questions or need help with your ACH security program? Let's talk!
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