

ACH Rules Compliance Audit Requirements

EFFECTIVE DATE

January 1, 2019

RULE STATUS

Rule Status

[Implemented](#)

This rule changes the structure of the audit requirement within the *Rules*, but does not change the requirement to conduct a *Rules* compliance audit annually.

Details

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This rule change modifies the *Rules* to provide financial institutions and third-party service providers with greater flexibility in conducting annual *Rules* compliance audits. The rule does not change the requirement to conduct a *Rules* compliance audit annually, but rather changes the structure of the audit requirement within the *Rules* by consolidating requirements for the annual *Rules* compliance audit into one section and removing redundant material.

Technical

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This Rule modifies the following areas of the *Nacha Operating Rules*:

- *Article One, Subsection 1.2.2 (Audits of Rules Compliance)* – consolidates the core audit requirements described within Appendix Eight under the general obligation of participating DFIs and third-party service providers/senders to conduct an audit
- *Appendix Eight (Rule Compliance Audit Requirements)* – eliminates the current language contained within Appendix Eight; combines relevant provisions with the general audit obligation required under Article One, Subsection 1.2.2

The language changes become effective on January 1, 2019 to apply to audits required to be conducted by December 31, 2019.

Impact

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The language changes become effective on January 1, 2019 to apply to audits required to be conducted by December 31, 2019.

Some organizations may decide to change or modify their methodologies for conducting audits

- Parties that currently rely exclusively on Appendix Eight as a checklist for conducting their audits should be aware of its limitations (noted earlier) and should be prepared to audit on all relevant rules, even those not currently expressly listed within current Appendix Eight language
- Current users of Appendix Eight's checklist should already be consulting the language within the Articles themselves and the remaining Appendices to ensure compliance with all relevant sections of the *Rules*

For those financial institutions and third-parties that may prefer a workbook or guide to facilitate their annual audit, more robust educational resources exist separately in the form of audit guides