

RDFI Compliance Checklist

June 2026 NACHA ACH Credit Monitoring Rule

#	Element	What It Looks Like in Practice
1	Documented risk assessment	Written assessment identifying which incoming credit Entry types and receiver account profiles carry higher vs. lower fraud risk.
2	Risk-based monitoring processes	Documented procedures that scale scrutiny to risk — e.g., monitoring transactional velocity, recipient name mismatches, originator history, and behavioral anomalies.
3	Detection criteria	Logic that flags both (a) unauthorized debits and credits (account takeover) and (b) transactions authorized under False Pretenses (scams where the Receiver was deceived).
4	Defined response procedures	Written steps for suspicious transactions: e.g., place a funds availability exemption, return via R17 (“QUESTIONABLE”) within standard return timeframe, or contact the ODFI
5	Annual review	Review of the processes and procedures at least once per year.
6	Update mechanism	Evidence that the annual review produces updates when patterns evolve.
7	Role-appropriate scope	Procedures tailored to the RDFI’s specific role and customer base
8	Audit trail	Records of flagged transactions, decisions made, and outcomes — to demonstrate the program operates, not just exists.