



ACH Operations Bulletin #5-2020

Nacha Provides Relief to RDFIs on Signature Requirements for Written Statements of Unauthorized Debit

March 27, 2020

The Nacha Rules require an RDFI to accept a consumer's Written Statement of Unauthorized Debit (WSUD), and also require that the WSUD be signed or similarly authenticated.¹

In light of the current need for many RDFIs to reduce on-site staffing levels, and the physical distancing requirements that currently apply to many people, Nacha will not enforce the signature/similar authentication requirement until further notice.

Additional things that RDFIs can do and should understand:

- RDFIs can direct consumers to report unauthorized debits by remote channels – e.g., online and by telephone. RDFIs that have the ability for consumers to similarly authenticate signatures by these remote channels should continue to do so;
- Before submitting a return, RDFIs should continue to take reasonable care to have the consumer verify claims of unauthorized ACH debits consistent with signature-based procedures to avoid improper returns;
- The existing extended return timeframe of 60-days² for claims of unauthorized debits to consumer accounts still applies.

¹ See 2020 Nacha Operating Rules and Guidelines, Subsection 3.12.5 RDFI Must Accept Written Statement of Unauthorized Debit, Page OR49 (Note: Effective April 1, 2020, the applicable Subsection will be 3.12.4, Pages OR51-52).

² See Subsection 3.13.1 RDFI May Transmit Extended Return Entries, Page OR 52.