

**Same Day ACH  
RDFI Implementation Checklist**

*July 2015*

**Receipt of Same Day Entries is not optional for RDFIs**, but does provide new opportunities with faster returns and exception processing. RDFIs may want to consider the following:

<b>Action</b>	<b>Considerations</b>	<b>Responsible Party</b>	<b>Completion Date</b>
<b>Educate decision makers in these areas on Same Day ACH (SDA)</b>	<b>Consider:</b> <ol style="list-style-type: none"> <li>1. Senior management/executive</li> <li>2. Product, sales, compliance across all three implementation phases</li> <li>3. Operations</li> <li>4. BSA and Fraud Monitoring</li> </ol>		
<b>Review current operational procedures and identify changes needed</b>	<b>Consider:</b> <ol style="list-style-type: none"> <li>1. Schedule of when posting occurs</li> <li>2. Receipt times and staff hours for Operations (such as amount of time and personnel different receipt processes take)</li> <li>3. Exceptions processing</li> <li>4. Your institution's definition of "end of day"</li> </ol>		
<b>Talk to ACH Operator(s), ACH processors and vendors, and Third-Party Service Providers to understand their solutions, system testing and implementation timelines</b>	<b>Consider:</b> <ol style="list-style-type: none"> <li>1. Create action plan for implementation: what to do and when across all three phases</li> <li>2. Review impacts and test downstream applications and systems</li> </ol>		
<b>Review documents for potential revisions to policies and procedures</b>	<b>Consider policies on:</b> <ol style="list-style-type: none"> <li>1. File receipt</li> <li>2. Processing of returns, including NSF decisions</li> <li>3. Exception processing</li> <li>4. Funds availability</li> <li>5. Handling of suspicious credit Entries (large dollar review)</li> <li>6. Prenotifications (Prenotes)</li> <li>7. Notifications of Change (NOCs)</li> </ol>		
<b>Test all updated procedures or system changes to verify systems perform as anticipated</b>			
<b>Update risk assessment policies and procedures</b>	<b>Consider:</b> <ol style="list-style-type: none"> <li>1. Does your institution require Board of Director approval for any service changes</li> </ol>		

Action	Considerations	Responsible Party	Completion Date
<b>Educate staff on SDA</b>	<b>Consider:</b> <ol style="list-style-type: none"> <li>1. Management on operational and customer service issues</li> <li>2. Call Center/ Front-Line to respond to account holder questions</li> <li>3. Compliance staff on monitoring: <ul style="list-style-type: none"> <li>• Suspicious Activity Review</li> <li>• Reg CC requirements</li> <li>• Funds Availability requirements</li> </ul> </li> </ol>		
<b>Educate consumers/ account holders, corporate Receivers about impacted products</b>			

<b>Same Day ACH Implementation Dates</b>		
<b>Phase</b>	<b>Implementation Date</b>	<b>Examples</b>
Phase 1 - same-day ACH Credits Only	September 23, 2016	hourly payroll, P2P payments, same-day bill pay
Phase 2 - adds same-day ACH Debits	September 15, 2017	consumer bill payments
Phase 3 - funds from Same Day ACH Credits must be available to customers by 5:00 p.m. RDFI local time	March 16, 2018	