Nacha Fraud Monitoring Readiness

Practical Support for Monitoring, Documentation, & Control Alignment

To align with Nacha fraud monitoring rules, organizations are shifting from reactive practices to documented, risk-based monitoring. IT Risk & Compliance professionals at Forvis Mazars can assist you in strengthening governance, monitoring, and audit readiness efforts.

How We Assist

Governance & Policy Alignment

- Define roles for fraud monitoring, escalation, and reporting
- Support updates to Automated Clearing House (ACH) and fraud policies for current requirements
- Document escalation, investigation, and reporting workflows
- Establish an annual review approach for monitoring activities

Fraud Risk Assessment Validation

- Review whether a fraud risk assessment has been performed
- Identify fraud schemes considered in the process
- Align monitoring with higher-risk ACH activity

Monitoring Infrastructure & Controls

- Review detection capabilities for anomalies and pattern changes
- Evaluate dashboards used to flag routing changes and new relationships
- Review ACH coding practices for required entry descriptions
- Consider third-party provider alignment with compliance expectations

Testing of Monitoring Practices

- Review selected samples to evaluate monitoring control
- Consider scenarios such as velocity changes, new payees, and high-dollar activity
- Identify activity that differs from historical patterns

Exception & Alert Monitoring

- Review alert investigation practices
- Document rationale for alert decisions
- Track resolution and follow-up activities

Operational Workflows

- Support identity and account ownership checks at onboarding
- Apply dual authorization for higher-risk transactions
- Provide training on fraud schemes, including impersonation and payroll diversion

Documentation & Audit Readiness

- Retain monitoring logs, including rules and thresholds
- Document systems used for fraud monitoring
- Maintain alert review and triage records
- Retain investigation and resolution documentation
- Maintain exception reporting outputs
- Support management and board oversight documentation
- Retain risk assessment documentation
- Maintain training records
- Document annual management review activities

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Monitoring Metrics Checklist

Organizations often track the following indicators to support risk-based monitoring:

Velocity

- ☐ Transfers to one account within a defined time period
- ☐ Activity tied to newly created accounts
- ☐ Changes in transaction patterns that differ from historical activity

Volume & Value

- ☐ Transaction thresholds by user profile
- ☐ Daily totals by vendor or employee
- ☐ Variance from historical activity

Account & Routing Data

- ☐ Changes to routing numbers over time
- ☐ Routing associated with certain financial institutions
- ☐ Indicators of international transaction activity

Behavioral Indicators

- ☐ Activity outside normal business hours
- ☐ Access from unfamiliar locations
- ☐ Changes in device or session attributes

Our Approach

Our team brings experience aligned with evolving payment risks and regulatory expectations. We work alongside you to support practical, scalable approaches tailored to your organization and operating environment, helping to provide clarity and build confidence.

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