

Frequently Asked Questions

Same Day ACH

What is the same day ACH rule?

Over the past several years, NACHA (The National Automated Clearing House Association) has worked with the financial services industry, businesses, and government agencies to accelerate ACH payments. Interbank same day ACH builds upon the existing ACH next day settlement capabilities to implement a faster payment option through the Automated Clearing House.

The NACHA rule required that ACH-capable financial institutions be able to receive same day ACH credits beginning September 23, 2016. The program expanded September 15, 2017 to include ACH debits.

Are banks required to be able to send same day items under the rule?

No. The rule requires that banks be able to receive and process same day payments, returns, and other transactions. The ability to send same day ACH payments is optional for banks. BBVA can originate and receive same day ACH items today.

Will all receivers (vendors, billers, and government agencies) be able to accept and apply a same day ACH payment on the same day?

Some government agencies and companies may not be able to process received same day ACH payments even though their banks can receive same day interbank ACH payments. Check with your trading partners for their specific capabilities and intentions.

What are the requirements for originating interbank, same day ACH payments?

Interbank, same day ACH payments must conform to these requirements:

- Interbank, same day ACH transactions need to be formatted as a “qualifying” standard entry class codes including PPD (used in payroll and other corporate to consumer applications), corporate payments (CCD, CCD+, CTX) and some other entry class codes. The IAT entry class code for international payments is not included in the same day ACH program.
- Credit and debit transactions
- Each transaction in the batch must be no more than \$25,000. Effective March 20, 2020 the per transaction limit is raised to \$100,000 for both debits and credits.
- The originator must be opted-in for interbank same day debit or credit ACH origination for each ACH Company ID originating interbank same day items. Same day opt in is needed for debits even if credit opt in has been previously established.
- The ACH file needs to arrive before the 11:30 a.m. CT deadline

Will non-conforming, same day interbank ACH transactions be rejected?

No. If a batch of ACH payments contains both conforming and non-conforming same day transactions (e.g., an individual ACH payment in a batch is over the \$100,000 limit), the non-conforming payment(s) will be originated with a value date of the next available processing day. All conforming items in the batch will be originated on a same day basis, if the originator is opted in, the file has arrived before the deadline, and it passes all other ACH validations.

Same Day ACH FAQ

Will BBVA be able to send same day interbank ACH payments to other banks?

Yes. Customers who wish to originate interbank same day ACH transactions will need to opt in. Automatic opt in is for new ACH customers as of 3/20/2020, but existing customers who are not opted in need to request the service. Contact your BBVA Treasury Management Officer for additional details.

Is there a file submission deadline for interbank, same day ACH payment origination through BBVA?

Yes. Customers who have opted in for same day ACH origination processing will need to submit interbank same day ACH files by 7:30 a.m. CT for the first window and 11:30 a.m. CT for the second window.

Are there additional fees for same day ACH?

A transaction surcharge fee may be assessed by BBVA to customers originating same day ACH items. Contact your Treasury Solutions Consultant for additional details.

What can I do now to get ready for same day ACH?

The Federal Reserve Bank and BBVA have performed an analysis of ACH originators' current practices and have found that many are already sending ACH transactions with same day effective dates or stale dates (dates in the past). Because of the potential for additional interchange fees, ACH payment originators may wish to reserve same day transactions for time-critical, urgent applications, such as contingency payroll or avoidance of late payment penalties.

If transactions are intended to settle on the following business day or later, please review the effective date that is generated by your internal applications that create ACH files, such as ERP and payroll systems. Make sure that the effective date corresponds to the intended date that the funds should be paid. When same day ACH commences, premium charges may be assessed for same day processing.

What if there is a system outage or delay, will items still process on a same day basis?

Unless otherwise mutually agreed, in the event of a system interruption or outage, same day items will be processed through the next available window, which may result in a delay in settlement by one business day.

Where can I obtain more information about same day ACH?

We will update our website as the new processing dates approach. In addition, NACHA maintains a resource site for ACH users [Originators and Receivers] at <https://www.nacha.org/content/same-day-ach-resource-center>. You may wish to bookmark this site to view updates. Your BBVA Treasury Solutions Consultant can also assist you further with same day ACH planning.