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December 18, 2025

Jane Larimer  
President and CEO  
Nacha  
11951 Freedom Drive, Suite 1001  
Reston, Virginia 20190

## **RE: INCREASING THE SAME DAY ACH DOLLAR LIMIT TO \$10 MILLION**

Dear Ms. Larimer:

The Independent Community Bankers of America (ICBA)<sup>1</sup> appreciates the opportunity to comment on Nacha's proposal to increase the Same Day ACH (SDA) dollar limit to \$10 million. ICBA supports efforts to advance faster payments in the United States while maintaining a safe and efficient system. ICBA supports this proposal to advance faster payments while acknowledging risk and efficiency concerns the expansion presents.

### **Faster Payments**

The ACH network, the backbone of the modern banking system, is both ubiquitous and interoperable. ACH transactions are electronic 'store and forward' messages, first implemented in 1968 to handle the growing volume of paper checks. Today, ACH debit and credit transactions account for the largest value of non-cash payments.<sup>2</sup> Consumers primarily use ACH for larger, scheduled transactions such as payroll deposits and bill payments. According to Nacha, the ACH network processed over 33.5 billion transactions, valued at more than \$86 trillion in 2024.<sup>3</sup> Nacha's current rules provide five processing windows: three SDA windows as well as 1-Day and 2-Day ACH options.

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<sup>1</sup> The Independent Community Bankers of America® has one mission: to create and promote an environment where community banks flourish. We power the potential of the nation's community banks through effective advocacy, education, and innovation. As local and trusted sources of credit, America's community banks leverage their relationship-based business model and innovative offerings to channel deposits into the neighborhoods they serve, creating jobs, fostering economic prosperity, and fueling their customers' financial goals and dreams. For more information, visit ICBA's website at [icba.org](https://www.icba.org).

<sup>2</sup> Board of Governors of the Federal Reserve System, Federal Reserve Payments Study, <https://www.federalreserve.gov/paymentsystems/fr-payments-study.htm> (last visited Dec 5, 2025).

<sup>3</sup> Nacha, Overall ACH Network Volume, <https://www.nacha.org/content/ach-network-volume-and-value-statistics> (last visited Dec 5, 2025).

ICBA supports the Nacha proposal to increase the SDA dollar limit to \$10 million from the current \$1 million limit. This end-state will align the dollar limits of the store and forward SDA transactions with modern real-time gross settlement (RTGS) systems, such as RTP and FedNow, providing consistent dollar limits across payment rails.

ICBA anticipates that only a subset of Originating Depository Financial Institutions (ODFIs) and their large business customers will regularly utilize the higher limit. Even so, the proposed increase could create incremental opportunities for community banks. Most small and mid-sized businesses are well-served by the current \$1 million threshold, but larger B2B payments, commercial loan distributions, and high-value payroll files could benefit from an increased same-day settlement limit. An increased SDA limit creates an alternative to wires for transactions up to the \$10 million limit.

### **Efficient Payments**

ICBA does not support an end-state where SDA and non-SDA ACH share the same dollar limit. The current non-SDA limit is just under \$100 million, a legacy constraint dating to the punch card era when ACH was first established. Any proposal to align SDA limits with those of non-SDA must be preceded by a formal assessment conducted by Nacha, including a prudential review of systemic risk, operational capacity, and impact to community banks. Such evaluation should be accompanied by structured engagement with industry stakeholders to ensure that potential consequences are fully understood before any alignment is considered. Following this assessment, any further increases in the SDA limit should be phased in over a defined period to provide all participants, particularly smaller community banks, adequate time to implement procedural changes necessary to manage operational risks effectively.

### **Safer Payments**

While Nacha's proposal does not introduce new risks, ICBA believes existing risks can be mitigated through bank measures such as staff training, and system updates. ODFIs and RDFIs can reinforce risk management controls by including individual consumer and business customer dollar limits, authentication protocols, and monitoring systems. Nacha should evaluate the effectiveness of the new 2026 Risk Management ACH Credit Monitoring rules and be willing to assess if an adjustment is needed before the March 2027 SDA limit is implemented.

ICBA recommends that Nacha engage the industry in discussions about establishing differentiated SDA limits on SEC codes beyond the current ARC, BOC, POP, RCK & ECK entry dollar limits that exist. While higher limits for business transactions present clear opportunities, consumers rarely require \$10 million SDA limits. Differentiated limits could help

mitigate fraud risk at the consumer level. Scams are successful when fraudsters can quickly move funds, especially from consumers who fall victim through authorized credit push fraud. High-value consumer transactions should not be rushed for same-day delivery when next-day or two-day options are available. Community banks prioritize making funds available as soon as it is safe to do so; an increased SDA dollar limit should not come at the expense of consumer security and fraud prevention.

## Conclusion

ICBA supports making larger dollar SDA payments faster, while maintaining an efficient back office and safe payment system. For further information, please reference the full survey submitted by ICBA or contact Kari Neckel at [kari.mitchum@icba.org](mailto:kari.mitchum@icba.org).

Sincerely,

*Kari Neckel*

Kari Neckel, AAP

Vice President, Payments & Technology Policy  
Independent Community Bankers of America