



TEXAS BANKERS ELECTRONIC CRIMES TASK FORCE



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The following is a recent action or issuance to be considered in the risk management practices for reducing the risks of Corporate Account Takeovers through the Protect, Detect and Respond framework.

NACHA Rules

Recent amendments to [NACHA rules](#), effective January 1, 2012, allow institutions to delay making the funds available in certain situations.

Recommended Action:

Update your Incident Response plan so your staff will know when trying to recover fraudulently transferred money to remind the receiving financial institution that the NACHA rule change now permits the financial institution to exempt itself from the funds availability requirement (when it reasonably suspects that the ACH credit is not authorized). Remember that sending a *Fraudulent ACH File Alert Request* (Section R5 and Appendix E of the Best Practices) through your Federal Reserve Bank may give the receiving financial institution more confidence that they may delay delivery of the funds without adverse consequences.