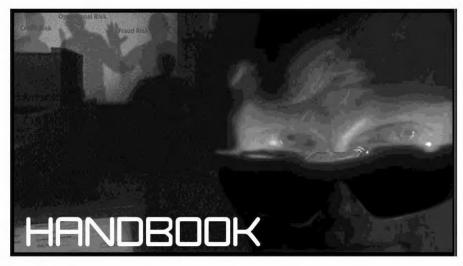


FedACH Risk® Origination Monitoring Service



FedACH Risk® Origination Monitoring Service Handbook

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Introduction

Originating Depository Financial Institutions (ODFIs) should use this handbook as a reference guide for the FedACH Risk[®] Origination Monitoring Service. The handbook is for informational purposes only, and all representations made herein are non-binding on the Federal Reserve Banks. The Appendix E of Operating Circular 4, alone, controls the terms and conditions of the FedACH Risk Origination Monitoring Service).

Your FedACH[®] Sales Specialist can help you through the start-up process, and FedACH a n d C h e c k C u s t o m e r s u p p o r t representatives are available for ongoing customer service support.

Each ODFI manages all aspects of the Service via FedACH Information Services. Subscriber roles set by the ODFI's End User Authorization Contact (EUAC) will determine user access for Service features in FedACH Information Services.

The Service is a priced Federal Reserve Banks, FedACH service offering. Fees are published in the Financial Services Fee Schedule available at <u>https://www.frbservices.org/servicefees/index.html</u>.

Service Overview

Description

The FedACH Risk Origination Monitoring Service enables ODFIs to mitigate some ACH origination risk associated with forward item batches. Service features address operational, credit, and third party risk associated with ACH payments regardless of the location, or number, of sending points. The Service allows ODFIs to set cumulative credit and/or debit processing limits (caps) for certain forward ACH batches processed by FedACH.

A participating ODFI has the option of identifying batches that are subject to the Service by either its routing transit number (RTN) only or by the combination of its RTN and associated Company Identifications (IDs). If the ODFI chooses to identify batches by Routing Number Only, batches in which that RTN occurs in the ODFI identification field of the batch header record are accumulated and compared to the debit and/or credit cap(s) that applies to that RTN. If the ODFI chooses to identify batches by its RTN and associated Company ID(s), batches in which that RTN and associated Company ID(s) occur in the batch header record are accumulated and compared to the debit and/or credit cap(s) that applies to that RTN. If the ODFI chooses to identify batches by its RTN and associated Company ID(s), batches in which that RTN and associated Company ID(s) occur in the batch header record are accumulated and compared to the debit and/or credit cap(s) that applies to that RTN and associated Company ID(s).

In addition, an ODFI that chooses to identify batches by its RTN and associated Company ID(s) will choose one of two Service options.

- Under the first option, Company ID Inclusive, the ODFI is responsible for defining all valid Company IDs to a RTN. Once the profile has been established, the Service will pend all batches containing Company IDs not defined by the ODFI. In addition, the Service will pend all batches for defined Company IDs which exceed debit and/or credit caps. Caps within the inclusive option can be set individually by Co ID.
- Under the second option, Company ID Select, the ODFI is responsible for defining a select number of Company IDs. The Service will only pend batches for defined Company IDs which exceed debit and/or credit caps. An ODFI may define as few as one Co ID for monitoring purposes.

The Service also provides ODFIs with the opportunity to determine timeframes for cap computations based on either process day or exposure days. Caps in the Service are compared to the accumulated dollar amounts of batches subject to the Service and are not an accumulation of ODFI settlement totals.

- Selecting "process day" means that the dollar values of batches that are subject to the Service are accumulated and compared to applicable caps for the current process day only and do not accumulate over multiple days. Process values will be reset to zero at the beginning of the next processing day (3:01 a.m. Eastern Time).
- Selecting "exposure days" means that the dollar values of batches that are subject to the Service accumulate over multiple days and are compared to applicable caps for the current process day as well as the amount of credits processed for the past two days and the amount of debits processed for past three days. The "exposure days" cap extends management of batches by measuring dollar value originated over multiple process days.

The Service releases batches for processing unless the batch will breach a credit/debit cap or is a batch identified by an undefined Company ID in the Company ID Inclusive option. Such batches will be pended by the Service. Pended batches are displayed in FedACH Information Services via risk service screens. Designated contacts at the ODFI will be notified via e-mail when a batch has pended.

Service subscribers release or reject pended batches via FedACH Information Services.

Each participating ODFI selects a predefined end-of-day default to either reject or release for processing any batch that remains in pend status at the end of the day. The end-of-day default action is in place for extraordinary circumstances only and should not be relied upon for routine operation.

Service Feature Examples

To fit an ODFI's business needs, the Service provides the flexibility to monitor batches in a variety of ways.

- Monitoring batches by Routing Number Only or by ODFI RTN and associated Company ID provides the ODFI flexibility in defining monitored batches.
- Cap limits for both debit and credit cumulative batch totals are predefined and can include dollar value, a zero dollar value, or null.

- > Pend notifications are made via FedACH Information Services and e-mail.
- Optional e-mail contact designated by ODFI RTN and associated Company ID allows for simultaneous notification of ACH operations and/or other functional areas within the ODFI such as a risk or relationship manager.
- > Each ODFI manages batches via FedACH Information Services.

The following examples demonstrate ways an ODFI may elect to use the features within the Service. The Federal Reserve Banks provide these examples only for the purpose of illustrating the Service and not as advice as to how an ODFI should manage its ACH business.

Example 1 – (Routing Number Only with designated caps)

This ODFI has a large originator with direct access to the ACH operator via a designated RTN. The ODFI has determined a daily origination limit for this originator. This ODFI may elect to use the service in the following manner.

odfi Rtn	Company ID	Debit Cap	Credit Cap	Cap Method	EOD Default
122045120	N/A	\$80,000	\$90,000	Process Day	Release

The ODFI has elected to manage batches by RTN only. The process day method allows the ODFI to monitor daily origination.

Example 2 (Company ID Inclusive)

This ODFI has a total of two originators and uses a third party service provider for origination services. The ODFI is concerned with know-your-customer responsibilities and wants to monitor batches processed with its RTN. The ODFI would like its risk manager to be notified when batches exceed caps. Service features allow the risk manager to receive notification of pended batches via e-mail and allow the risk manager to release these batches via FedACH Information Services if he/she is credentialed.

odfi RTN	Company ID	Debit Cap	Credit Cap	Cap Method	EOD Default
122112341	С	\$0	\$4,000	Process Day	Reject
122112341	D	\$1,000	\$2,000	Process Day	Reject
122112341	Undefined batches at End of Day Default – Reject				

The ODFI has chosen the Company ID Inclusive version that pends batches containing undefined Company IDs. The end-of-day defaults have been set to reject batches. Criteria for Company ID C and D have been set by process day limiting the dollar value of forward origination in a single day.

Example 3 (Routing Number Only with \$0 credit cap and a null debit cap)

This ODFI has one originator, a local utility company. This ODFI has chosen to manage batches by its RTN only.

ODFI	Company	Debit	Credit	Cap Method	EOD
RTN	ID	Cap	Cap		Default
122045120	N/A		\$0	Process Day	Reject

With only one ACH originator, this ODFI is able to monitor batches by RTN only. The zero value credit cap allows this ODFI to monitor all credit batches and confirm account balances prior to release of credit payments for processing.

Example 4 (Company ID Select)

This ODFI has 30 originators and uses three sending points. Originators vary in business application and risk level. The ODFI would like to manage one originator from each sending point. This ODFI will manage batches under the Company ID Select version.

ODFI RTN	Company ID	Debit Cap	Credit Cap	Cap Method	EOD Default
122045120	Х	\$10,000	\$90,000	Exposure Days	Reject
122045120	Y	\$4,000	\$0	Process Day	Reject
122045120	Z		\$7,000	Process Day	Release

The ODFI is using the Select version and wants to monitor only three of the 30 originators. All batches defined by the 122045120 RTN and an exact match of Company ID X, Y, or Z will be monitored by the Service. Company Y is prevented from originating credits without release by the ODFI. Company Z has no limits on debit origination.

Service Considerations

The Service provides robust flexible features, allowing added opportunity for ODFIs to monitor origination risk. ODFIs using the Service should monitor batches with these considerations in mind.

The Company ID as it is entered by the ODFI in FedACH Information Services must match exactly to the Company ID in a batch's header record. Please note that under the Company ID Inclusive version, batches identified by a defined RTN and associated Company ID which do not exactly match the Company ID(s) entered in FedACH Information Services could result in a significant number of pended batches. Accumulated batch totals will not reflect undefined Company ID batches unless the batches are resubmitted with defined Company ID formatting. In the Company ID Select service version, batches containing undefined or improperly formatted Company IDs will not be monitored by the Service.

- Cap computations defined by "exposure days" will begin to accumulate on the first business day after the Routing Number Only or ODFI RTN and associated Company ID are defined in the Service. The Service will require three full days of monitoring to build batch history into the accumulative totals. In the event of an extended service interruption, the Service will be suspended, all batches subject to the Service will be processed, and accumulative totals will not reflect the value of batches processed during the Service interruption.
- An ODFI may elect to have e-mail notifications sent to contacts that do not have access to FedACH Information Services. Notification e-mails do not include pended batch information but provide a link to FedACH Information Services. If the recipient of an e-mail does not have access to FedACH Information Services, this link will not be accessible. Such a recipient must rely on ODFI personnel who have access to FedACH Information Services to provide details about pended batches and to take action to release/reject pended batches.
- E-mail services at the Federal Reserve Banks or at the ODFI may experience delays or interruptions in service. Information concerning batches pending and/or rejecting as the result of the Service will be available to ODFIs via FedACH Information Services.
- Originating depository financial institutions participating in the Service must designate one or more contacts who are FedACH Information Service subscriber(s) with the authority to release pended batches. Originating depository financial institutions participating in the Service should have a contingency plan in place that provides for access to FedACH Information Services in the event of an ODFI outage. Customer Operations Support site staff will not provide information about pended batches to and will not release or reject pended batches for customers who are unable to access FedACH Information Services.

Getting Started

Your FedACH sales specialist will help get you started with the Service. Contact information is available in My FedDirectory at <u>https://www.frbservices.org/contacts/index.jsp</u> There are two components to getting started with the Service: 1) completion of the FedACH Participation Agreement, Part 6B, and 2) completion of the Subscriber Credential and Access Control Form.

FedACH Participation Agreement Part 6B

The FedACH Participation Agreement is the agreement between the ODFI and the Federal Reserve Bank that governs participation in all FedACH Services. This agreement must be signed by a person listed as a signatory authority on the ODFI's Official Authorization List on file at the ODFI's local Federal Reserve Bank. Providing a signed copy of Part 6B to the FedACH sales specialist or FedACH Customer Operations Support representative is a critical step for getting started with FedACH Risk Origination Monitoring. The FedACH Participation Agreement Part 6B is available at https://www.frbservices.org/forms/fedach_services.html.

Subscriber Requests

Subscriber requests are used by an ODFI's End User Authorization Contact (EUAC) to request Subscriber access. The requested credentials will define the Service access roles for each Subscriber. Credentials are issued by routing number and must be established for any ODFI routing number monitored by the Service. A description of the Subscriber roles associated with the Service is found in Appendix 1 of this document. Subscriber requests are available via the EUAC Center within FedLine[®] Home.

The FedACH Participation Agreement Part 6B described in the previous section activates the Service giving FedACH permission to begin monitoring the ODFI's ACH processing. The Subscriber access form mentioned above identifies individuals who will be authorized to access the FedACH Information Services screens that the ODFI will use in connection with the service. The order of completion for the two forms is best determined by the ODFI and may depend on the intended use of the service. The following two examples help to clarify the order.

The first example is an ODFI that has chosen to use the Company ID Inclusive service version to manage its batches. It has several Company IDs it would like to list in the service. The ODFI's staff has determined it will take a few days to collect and enter the information via FedACH Information Services. If the ODFI has its FedACH Customer Operations Support site activate the Service before entering all the Company ID information associated with its RTN, the Service is likely to pend multiple batches. This ODFI will probably want to complete Subscriber access first, enter all the Company ID information, and then have FedACH activate the Service. This approach can reduce the possibility of error and the potential for a large number of pended batches.

The second example is an ODFI that would like to use the Company ID Select service version to manage its batches. This ODFI has submitted Part 6B to have the Service activated, but has not completed the Subscriber credential request process. No management criteria will exist in the Service for this ODFI because it has not entered criteria in FedACH Information Services. The activated Service will not monitor ACH processing without management criteria. The ODFI can enter management criteria for the service upon receipt of credentials and monitoring of ACH processing will begin the following business day.

It is recommended that ODFIs receive Subscriber credentials and enter management criteria prior to Service activation. It is critical for the ODFI to have credentialed staff available to release or reject pended batches once management criteria are in place. FedACH Customer Operations Support staff will not be able to release pended batches on behalf of the ODFI using the Service.

For questions concerning Subscriber requests, please contact your Customer Contact Center (<u>https://www.frbservices.org/contactus/ccc.html</u>).

For Questions concerning <u>FedACH Participation Agreement Part 6B</u> please contact a FedACH Customer Operations Support site <u>(https://www.frbservices.org/contactus/fedach_operations.html</u>).

Management Criteria Option Definitions

Management Criteria is the combination of variables the ODFI will use to monitor ACH processing with the Service. These variables are listed below.

- Company ID(s) indicates the batch header record field values for Company ID that, combined with the ODFI RTN, identify batches to be monitored by the Service. The Company ID(s) field may be alphanumeric, and up to 10 characters. A blank space in the Company ID field indicates a space between characters. A Company ID defined in FedACH Information Services MUST MATCH EXACTLY to the Company ID in a batch's header record in order for the batch to be summed and compared to a debit and/or credit cap.
- Credit and/or Debit Caps are whole-dollar values from 0 to 9,999,999,999,999. A zero cap value will pend all identified batches for ODFI monitoring. A blank field indicates no cap, which means that batches will be released for processing without comparing their dollar value to a cap.
- Cap timeframe determines the time frame used to accumulate values. The cap timeframe can be set to monitor by current "Process Day" or "Exposure Days." Exposure Days is defined by current processing day plus the past two processing days for credits and past three processing days for debits.
- End-of-Day Default determines the action (release or reject) the Service will take in the event a batch remains in a pend status at the end of the process day. This criterion determines if pended batches should be "released" or "rejected." The end-of-day default action is in place for extraordinary circumstances only and should not be relied upon for routine operation.
- Contact Information (name, e-mail, and phone number) identifies contacts who will receive notification e-mails when batches pend or reject at end-of-day.

Operation

After an ODFI and the Federal Reserve Banks complete the Service set up process, the Service will begin monitoring batches based on the criteria the ODFI enters in FedACH Information Services. Apart from changes to the sending point acknowledgement described below, the Service will be relatively transparent for ACH processing unless one or more batches pend. Additional information describing the Service is available in the Service Overview section of this document.

The Service may increase the FedACH processing time for files. FedACH Information Services will provide a detailed description of the processed batches. Batches monitored by the Service will initially pend in FedACH while a cap review occurs. Upon competition of the cap review, the batch

will either be processed or the pend status will change to "Batch Pended for ODFI Risk Orig Mon." The ODFI and/or Sending Point may observe this process in FedACH Information Services.

Service and Management Criteria must be updated by 2:00 a.m. ET to have changes or additions take effect at opening of business the next business day. These criteria will be set and/or changed by a credentialed Subscriber via FedACH Information Services.

End-of-day default changes received by 2:00 a.m. ET will take effect the same business day. Same day end-of-day default changes can be set and/or changed by an authorized Subscriber via FedACH Information Services.

Pended batches not acted upon prior to the FedACH 2:15 a.m. ET end-of-day will be released or rejected based on the end-of-day default. The end-of-day default action is in place for extraordinary circumstances only and should not be relied upon for routine operation.

For ongoing support, FedACH Customer Operations Support sites are available from 5:30 p.m. ET on Sunday until 3:00 a.m. ET on Saturday.

Sending Point

Upon submission of a file containing batches that are subject to the Service, the sending point will receive an acknowledgement from FedACH containing a message with reference to the Service. This message will appear on the third line of the file acknowledgement. The message text will read BATCHES PENDED FOR ODFI RISK ORIGINATION MONITORING. No additional messages will be sent to the sending point if batches in the file contain no item level errors and are not rejected.

If the batch contains item level errors and the batch is not rejected, an additional acknowledgement will be sent to the sending point. The message text will read PENDED BATCH ACCEPTED. This message informs the sending point of the processing of a batch with item level errors.

If a pended batch is rejected by the ODFI via FedACH Information Services or by the risk Service's end-of-day default, an acknowledgement will be transmitted to the sending point with the text BATCH REJECTED BY ODFI RISK ORIG MON.

An ODFI participating in the Service should review these messages with its sending point to eliminate initial confusion. It may also be beneficial for the ODFI to inform its sending point of the notification provided by the Service.

When a Batch Pends

Subscribers should actively and frequently monitor FedACH Information Services to remain aware of pended batches. If one or more batches pend, an e-mail notification will also be sent to ODFI contacts based on e-mail information provided by the ODFI. If an ODFI has designated optional contacts for either a specific Company ID or for batches identified by undefined Company IDs, these contacts will also receive e-mail notifications when applicable.

An authorized Subscriber will be able to sign onto FedACH Information Services and access the Origination Monitoring Batch Status screen. A Subscriber with release/reject authority will use this screen to select pended batches and either reject or release batches. This screen populates a record of all batches pended by the Service and the action taken on those batches for the current business day.

As part of the sign-up process, ODFIs will select a default option for end-of-day processing. If no action is taken on batches pended by the Service before 2:15 a.m. ET, the Service will reject or release pended batches based on end-of-day default instructions. The end-of-day default action is in place for extraordinary circumstances only and should not be relied upon for routine operation. If a batch is rejected by the end-of-day default, an additional e-mail notification will be sent to contacts defined in the Service. Information concerning the status of batches monitored by the Service is available on FedACH Information Services.

Making Changes to the Service Criteria or Management Criteria

To add, delete, and change Service criteria, ODFIs are able to use self-service functionality via FedACH Information Services.

Service Criteria and Management Criteria updates via FedACH Information Services must be received by 2:00 a.m. ET to have changes and/or additions take effect at opening of business the next business day.

FedACH Customer Operations Support site representatives are available from 5:30 p.m. ET on Sunday until 3:00 a.m. ET on Saturday. Contact information is available at https://www.frbservices.org/contactus/fedach_operations.html

Historical Reporting

The Service provides historical reporting to assist in the monitoring of batches. These reports are "Origination Monitoring Event History" and "Management Criteria Event History".

The Origination Monitoring Event History report provides a record of pended batches and the resulting release/reject decision for the past 60 days. This report includes a summary of daily pend activity including the Cap, Accumulated Totals, and the Remaining Cap for a user-defined Company ID. A detailed description of the disposition of pended batches is also available, including identification of the Subscriber responsible for the disposition. The <u>FedInvent</u> system is available to convert this report into a spreadsheet for easier analysis. <u>https://www.fedinvent.org/</u>

The "Management Criteria Event History" report allows the user to view changes in management criteria for a minimum of 12 months. This report also includes the credential information for the Subscriber making changes to management criteria.

Frequently Asked Questions

https://www.frbservices.org/help/fedach_risk_origination.html

Appendix 1

Subscriber Access Roles

The End User Authorization Contact (EUAC) with authority to designate Subscribers for FedACH services will be able to assign any of six distinct roles to Subscribers of the FedACH Risk Origination Monitoring Service. Each role is independent of the others. A Subscriber may not have more than one role. To operate the origination monitoring service, the EUAC will need to assign the roles of Set/Edit Criteria and Release Pended Batches to one or more users within the ODFI.

In addition to the new Subscriber roles related to the Service described below, access to FedACH Information Services inquiry screens will be required for new Subscribers.

1. Set/Edit Criteria Under Dual Control, View Only Pended Batches

A Subscriber with this role will be able to set and edit management criteria and approve management criteria, but will not be able to approve management criteria that he/she has entered. This Subscriber will be able to view the screens associated with pended batches, but will not be able to release or reject the batches.

2. Set/Edit Criteria Under Dual Control, Release Pended Batches

A Subscriber with this role will be able to set and edit management criteria and approve management criteria, but will not be able to approve management criteria that he/she has entered. This Subscriber will also have view access to the screens associated with batches pended by the Service and be able to release or reject these pended batches.

3. Set/Edit Criteria, Release Pended Batches

A Subscriber with this role will be able to set and edit management criteria and approve management criteria without the involvement of a second person. This Subscriber will also have view access to the screens associated with batches pended by the Service and be able to release or reject these pended batches. This option allows a single Subscriber to set and approve criteria changes and release batches.

4. Set/Edit Criteria, View Only Pended Batches

A Subscriber with this role will be able to both set and edit management criteria and approve management criteria without the involvement of a second person. This Subscriber will be able to view screens associated with batches pended by the Service, but will not be able to release or reject the batches. This option allows a single Subscriber to set and approve criteria changes. A second Subscriber with authority to release batches will be needed.

5. View Only Criteria, Release Pended Batches

A Subscriber with this role will not be able to set, edit, or approve management criteria. The Subscriber may only view these criteria. This Subscriber will be able to view screens associated with batches pended by the Service and release/reject these pended batches. If

this option is selected, additional Subscribers with authority to set and approve management criteria will be needed.

6. View Only Criteria, View Only Pended Batches

A Subscriber with this role will not be able to set/edit or approve management criteria. The Subscriber may only view these criteria. This Subscriber will also only be able to view screens associated with batches pended by the Service. If this option is selected, additional Subscribers with authority to set and approve management criteria and to release batches will be needed.

USER ACCESS LEVEL	SERVICE	Criteriamainten	RELEASE/REJECT	BATCHES	
	Set and approve	<u>Set or</u> approve(Dual Control)	View	Release and reject	<u>View</u>
1.		<u>X</u>			<u>X</u>
2.		<u>X</u>		<u>X</u>	
3.	<u>X</u>			<u>X</u>	
4.	<u>X</u>				<u>X</u>
5.			<u>X</u>	<u>X</u>	
6.			<u>X</u>		<u>X</u>

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