

# Third-Party Sender Roles and Responsibilities

## WHAT:

Two new Nacha Rules regarding

### 1. *Nested Third-Party Senders*

Defines Nested Third-Party Senders; requires their relationships be addressed in ACH Origination Agreements; Originating Depository Financial Institutions (ODFIs) must identify in Nacha's Risk Management Portal all Third-Party Senders allowing Nested Third-Party Sender relationships.

### 2. *Third-Party Sender Risk Assessments*

Explicitly states that a Third-Party Sender—whether Nested or not—must conduct a Risk Assessment of its ACH activities.

## WHY:

To provide clarity and remove confusion surrounding the roles and responsibilities of parties to a Nested Third-Party Sender relationship, and to promote a culture of risk management and compliance by Third-Party Senders using the ACH Network.

## WHEN:

While the Rules are effective Sept. 30, 2022, changes would apply to ACH Origination Agreements entered into on or after that date. For updating Risk Management Portal registrations and completing Risk Assessments there is a six-month grace period, until March 31, 2023.

Learn more at:

[Nacha.org/TPSRolesResponsibilities](https://Nacha.org/TPSRolesResponsibilities)

