ACH Audit Checklist
For Audit Year 2020

This checklist is designed to assist financial institutions, Third-Party Service Providers, and Third-Party Senders in preparing for and conducting their annual ACH Rules audit as required by the Nacha Operating Rules.

How do I use this document?
The Nacha Operating Rules do not define procedures for completing the annual rules compliance audit. This checklist is designed to assist your auditor in identifying the key ACH operational processes that should be a part of the audit, the materials needed, and where to go for more detailed information on specific requirements and related regulations.
Before You Start

It is important to identify the scope of the audit before you begin, to decide how many samples to examine, and what parts of the organization may need to be called upon for assistance.

Separation of Duties

In order to provide an independent audit opinion, WesPay Advisors recommends your organization take steps to ensure the ACH audit is conducted by staff that are not responsible for ACH functions.

Audit Focal Period

WesPay Advisors recommends establishing a focal period for the audit and selecting sample entries from that period to test for compliance with the rules. The focal period selected is at the auditor’s discretion and should be based on the size and complexity of the organization’s ACH processes. Organizations may need to establish different focal periods to test for compliance with different rules given that some scenarios or transaction types are rarer than others.

WesPay Advisors’ approach is to select a three-month focal period, a focal month, and two focal weeks to use for testing. In most cases, there are enough transactions in the two-week focal period to select a representative sample for testing. In cases where a larger sample is needed, it can be selected from the focal month or longer focal period if needed.

Define your ACH Audit time frames or focal period here:___________

Conducting Your Audit

Following is an outline of key rules areas that should be reviewed during the audit, with appropriate techniques employed to validate the accuracy of processes, as necessary.