Offering Same Day ACH products and services is **optional for ODFIs.** ODFIs choosing to offer Same Day products and services, may want to consider the following:

<table>
<thead>
<tr>
<th>Action</th>
<th>Considerations</th>
<th>Party Responsible for Task</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Educate decision makers in these areas on Same Day ACH (SDA):</strong></td>
<td><strong>Consider:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Senior management/executive</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Product, sales, compliance across all three implementation phases</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Operations</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Develop a strategy on how your FI will use SDA</strong></td>
<td><strong>Consider:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Evaluating risks from an enterprise-wide perspective (across all departments)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Use cases that may be offered or pursued</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Classifying eligible ACH customers for the service, including if corporate and consumer accountholders will have access to Same Day services</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. Identifying downstream ACH origination and file transmission applications and systems that may be impacted by Same Day Entries</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5. Assessing budget impacts and potential fee schedule impacts</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Review current ODFI operational procedures and identify changes needed</strong></td>
<td><strong>Consider:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Processing cut off times</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Use of Effective Entry Date by Originators (know how customers/members are currently using this field to determine if an optional identifier should be utilized)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Credit risk management processes such as prefunding</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>4. Fee schedules and pricing</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>5. Reversal processing</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Talk to ACH Operator(s), ACH processors and vendors, and Third-Party Service Providers to understand their solutions and implementation timeframes</strong></td>
<td><strong>Include:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Bill pay services</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Transfers and any non-traditional ACH Origination channels</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Consider:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1. Create action plan for implementation across phases, including system testing</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>2. Update risk assessment procedures or policies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Action</td>
<td>Considerations</td>
<td>Party Responsible for Task</td>
<td>Completion Date</td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Review documents for potential revisions</td>
<td>Consider: 1. Internal policies and procedures as needed, including a step to test all changes 2. Origination Agreements 3. Processing windows and cut-off timeframes 4. Hours of operation 5. Identification of Same Day ACH transactions and proper use of Effective Entry Date (particularly if pricing is affected by this) 6. Fee schedules</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Educate Originators and Third-Party Senders</td>
<td>Consider: 1. Operational impacts to Originators and Third-Party Senders and their software providers 2. Eligibility requirements for Same Day ACH 3. Opportunities available for usage</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Same Day ACH Implementation Dates

<table>
<thead>
<tr>
<th>Phase</th>
<th>Implementation Date</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 1 - same-day ACH Credits Only</td>
<td>September 23, 2016</td>
<td>hourly payroll, P2P payments, same-day bill pay</td>
</tr>
<tr>
<td>Phase 2 - adds same-day ACH Debits</td>
<td>September 15, 2017</td>
<td>consumer bill payments</td>
</tr>
<tr>
<td>Phase 3 - funds from Same Day ACH Credits</td>
<td>March 16, 2018</td>
<td></td>
</tr>
</tbody>
</table>