

# ACH 2020 Company Assessment



Your company is responsible for establishing and strictly maintaining procedures to safeguard against unauthorized transactions, to protect private data, and to comply with the NACHA Operating Rules.

Protect against theft and Cybercrime	Yes	No
Does your company control and protect the information that enters and leaves your computers by maintaining a secure firewall and security suite, including the most current updates and patches?	<input type="checkbox"/>	<input type="checkbox"/>
Do you enforce confidentiality and strong security procedures for employee access which includes prohibiting the sharing of logons and passwords?	<input type="checkbox"/>	<input type="checkbox"/>
Do you immediately disable access for former employees or those that have changed job duties?	<input type="checkbox"/>	<input type="checkbox"/>
Are you logging into TBO Business and sending files from a secure and private internet connection and avoiding free or public WiFi?	<input type="checkbox"/>	<input type="checkbox"/>
Do you avoid using the ADMIN User ID for daily use and for the sending of ACH transactions? Note: Not all companies have an ADMIN User ID.	<input type="checkbox"/>	<input type="checkbox"/>
Does your company follow the bank's dual authorization recommendation that requires two separate users to approve and submit an ACH file?	<input type="checkbox"/>	<input type="checkbox"/>
Will your company notify the bank immediately if your email, computer, online banking or network are ever breached or compromised?	<input type="checkbox"/>	<input type="checkbox"/>
Comply with the NACHA Operating Rules	Yes	No
Does your company require a signed authorization form for each payment you originate, and do you retain the forms for 2 years after the final payment?	<input type="checkbox"/>	<input type="checkbox"/>
Are proper SEC codes used for ACH payments? <ul style="list-style-type: none"> <li>• PPD = Personal payment</li> <li>• CCD = Corporate payment</li> </ul> Personal and corporate payment types cannot be mixed in the same template or batch.	<input type="checkbox"/>	<input type="checkbox"/>
Is your company correcting the information provided in a "Notices of Change" (NOC) within the required 6 banking days after receiving the email notification?	<input type="checkbox"/>	<input type="checkbox"/>
Does your company maintain a "Security Framework Policy" regarding the collection, storage, access and destruction of the private data used to create your ACH payments?	<input type="checkbox"/>	<input type="checkbox"/>

**By signing, I certify that the responses provided are true and correct to the best of my knowledge.**

\_\_\_\_\_  
Business Name

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Company Administrator

\_\_\_\_\_  
Signature of Company Administrator

Return completed form by email to [businessbankers@capfed.com](mailto:businessbankers@capfed.com) or by fax to 785-274-5670.