3060
ACH Originator Policy

Teachwell sends electronic payments through the ACH (Automated Clearing House) Network such as payroll direct deposits and/or vendor payments. Because of these payments, Teachwell is classified as an ACH Originator. As an ACH Originator, Teachwell is required to meet the requirements of the NACHA Operating Rules which govern the ACH Network. Teachwell's bank requires compliance with the Rules as a condition of Teachwell's ability to send ACH Payments.

Responsibilities. Teachwell follows all terms of its Originating Depository Financial Institution/Originator Agreement with its bank. Teachwell obtains a written authorization before sending any ACH payment. Teachwell meets all processing deadlines set by the bank and NACHA. Teachwell gives authorization records to the bank upon request within NACHA's required timeframes. Teachwell keeps all sensitive banking information secure. When Teachwell receives a Notification of Change, it updates the payment record before the next ACH transaction. When Teachwell receives a return due to an error or unauthorized activity, it stops all related subsequent payments until instructions are received from the Bank. Teachwell keeps its computer systems and network secure in line with its bank agreement. Teachwell uses procedures to spot unauthorized payments. All employees with ACH duties will complete training, if required by the Bank or NACHA, and respond to audit requests. Teachwell will implement internal controls and procedures to mitigate errors and risk of unauthorized ACH entries.

ACH Procedures. Teachwell submits all ACH files through its bank's online portal using multi-factor authentication.

Fraud Monitoring. Teachwell reviews ACH transactions for unusual patterns or amounts before submitting each file. If Teachwell suspects an error or unauthorized ACH transaction, Teachwell will: determine whether the problem is fraud, a scam, or an internal error; notify the bank right away; contact law enforcement if needed; and stop all related future ACH transactions.

Employee Training. All employees with ACH duties will complete ACH origination training provided by the bank each year.

Adopted on: 7/21/26