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Tackling Credit Push Fraud: Understanding Nacha's Risk Management Package (Part Two)

Payments Pros – The Payments Law Podcast

SPEAKERS

[Keith J. Barnett](#) | [Carlin A. McCrory](#)

In the final episode of the *Payments Pros* special two-part series, Jordan Bennett, Nacha's senior director of network risk management, joins Keith and Carlin to discuss the new rules regarding fraud monitoring.

Fraud Monitoring Phase 1 will become effective on March 20, 2026, and Phase 2 on June 19, 2026. These rules require all nonconsumer originators, ODFIs, third-party service providers, and third-party senders to establish and implement risk-based procedures to identify potential fraudulent transactions. The aim is to reduce the incidence of successful fraud attempts.

The group discusses that the rules do not prescribe a specific method for monitoring, allowing each party to adapt according to their needs. However, inaction is not an option. Parties should conduct a risk assessment and adjust their policies accordingly.

Jordan advises leveraging existing resources and ensuring contacts are prepared to respond to fraud incidents. He clarifies that these changes don't reallocate liability or establish new duties, but aim to foster teamwork in fraud prevention.

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