NACHA may assess a fine that could be passed on to you that ranges from $1000 up to $500,000 per month if you are unable to provide proof that you have obtained authorization to debit your customer’s bank account.

The NACHA Rules require you to obtain authorization before you originate ACH entries to your customer’s bank account and to retain that authorization for a period of at least 2 years.

By not obtaining an authorization, and retaining it, you are noncompliant with NACHA's Rules (Subsections 2.3.1 and 2.3.2.7)

If you have questions please refer to your ACH User Guide or contact Customer Care.  Or, you may purchase a copy of your own NACHA Operating Rules at NACHA.org/store.