



Policy Title NACHA – Sensitive ACH Data Security Policy	Original Adoption Date 11/28/11	Policy Number FS-662
Responsible College Division/Department Financial Services	Responsible College Manager Title Vice President of Administration	
Policy Statement LTC, as a merchant, obtains ACH information from its customers and students, and thus, must comply with NACHA’s ACH Security Framework. Third party vendors that the college contracts with to process ACH payments and/or capture ACH information must also verify compliance with the standards. This policy requires that the college staff and contractors protect bank account information and comply with the requirements of NACHA.		
Reason for Policy NACHA is seeking to advance security of the ACH Network and its participants and their customers against increasingly sophisticated threats to the security of sensitive financial ACH data. NACHA’s Security Framework is intended to establish a set of minimum data security obligations for ACH Network participants to protect the sensitive ACH data within their purview, thereby reducing both out-of – pocket losses experienced by ACH participants and their customers and the damaging effect of data breaches on the reputation of the ACH Network and its participants.		
Historical Data, Cross References and Legal Review Created/Adopted: 11/28/11 Review/Revised: 8/23/20 Legal Counsel Review and Approval: Board Policy: III.F. Asset Protection		
Definitions		