

Per-account velocity controls

velocity-controls-v1 - v1.0

Effective: 2026-04-25

Owner: AML / Fraud investigations

Applies to: wire_transfer, pay_invoice, cash_out, debit

Purpose

This policy is the FFIEC-recommended velocity-control backstop for account-takeover scenarios. It limits how fast a single originator can fan out payment-class actions, capping both the count and the dollar volume per processing window.

Limits

Per-account velocity limits -- measured against the originating account (origin_account) within a single processing window (step):

- More than 5 transactions in the current step from the same originator -- deny. Burst submission patterns are a strong indicator of automated abuse or compromised credentials.
- Cumulative submitted volume above \$50,000 in the current step from the same originator -- deny. Rapid velocity at high dollar value compounds the risk.

Pre-authorization carve-out

These limits do not apply to verified automated payment systems that have vendor pre-authorization documented in the request context (context.preauthorization_id set). Treasury operations that legitimately fan out high volumes -- payroll runs, settlement batches -- go through that documented pre-auth path.

Required action

When a velocity limit is hit, deny the new transaction with reason_code='velocity_limit_exceeded' and include the offending counter (transaction count or cumulative volume) in the reason text so the reviewer can quickly assess whether to escalate.

Do not route to manual review by default. Velocity hits should backpressure the calling agent immediately. Operators who need to investigate can find the originator in the dashboard's incidents tab.

Why this rule exists

Velocity controls are FFIEC-recommended for both internet-banking and wire-room operations as a backstop to account-takeover scenarios where a compromised credential is used to drain accounts faster than other monitoring can react. The specific thresholds (5 transactions per

step, \$50,000 per step) are tuned conservatively. A real production tenant should set their limits based on their own historical 99th-percentile activity bands.