

Paycheck Protection Program PPP Platform Webinar

Origination & Forgiveness Updates

Date: March 3rd, 2021





Agenda

- Introduction & Recap
- Servicing updates
- **Etran Demo** How to increase/decrease PPP Loan amount
- Review of how Hold Clearing Works
 - (2020 Holds and 2021 Compliance Checks) Table 1 & Table 2
- Update on Platform Updates
 - 3508 Forgiveness Changes Discussion Preparing for 3/5
 - DUNS Validation Updates
 - ITIN for Borrower Submission Expansion of Support
 - Max Loan Amount Optimization
 - Upcoming Schedule C Changes









Recap

- We continue to see positive momentum with vendors and lenders calling and exercising all the API endpoints.
- Most Current PPP Report for 2021: 2,092,884 approvals @ \$151B (as of 2/25)
 - https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program/ppp-data

Platform updates

No.	Category	Update
1	Forgiveness changes	 Latest 3508, 3508S and 3508EZ form changes – Going live – 03/05 (late 3/4)
2	Optimized duplicate DUNS validation	Platform has updated approvals as optimization validation has allowed;
3	ITIN For borrower submission	Platform now supports ITIN for the Borrower (effective 3/4)
4	Max Loan amount control	Platform has been optimized around this validation with SBA's support

GitHub Page:

Forgiveness - https://ussbaforgiveness.github.io/ Origination - https://ussbappp.github.io/

• Feel free to reach out to <u>developer@ussbaforgiveness.com</u>, for technical questions







Servicing Updates

Tax ID Corrections

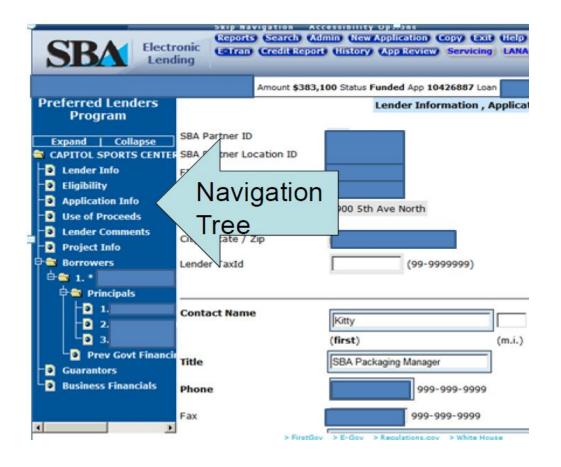
- To improve customer service and reduce processing times, SBA recently made an important change to enable Lenders to make Tax ID changes in Etran without the need to involve SBA. For loans in "Regular Servicing" status, just navigate to <u>CAFS Etran Servicing</u> to make corrections. Not sure how to use this new lender driven feature? Just click <u>tin-self-service-instructions.pdf</u>.
- SBA will continue helping lenders with corrections that lenders with corrections that cannot be made via the self-service option primarily 1) a name change/correction or 2) a correction of a Tax ID on a PPP loan in *Paid in Full status*. SBA asks that lenders please send these requests to LRSC.servicing@sba.gov for loans serviced by the Fresno CLSC.







<u>Demo – How to increase/decrease PPP Loan amount in Etran</u>







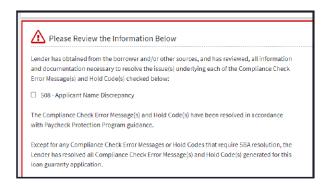


Review of how Hold Clearing Works (2020 and 2021)

Table 1 & Table 2 - Hold Updates

Compliance Check Errors (resulting in Not Approved 2021 Loans)

- Click on your Not Approved Loan in the Platform to discover the Error
- 2) If Lender Certification is allowable, follow the on-screen instructions to submit your request.



Hold Codes (resulting from First Draw Holds)

- 1) Find your First Draw Loan Hold Reason within the Proactive Loan & Hold Review tab.
- 2) If Lender Certification is allowable, follow the on-screen instructions to submit your request to the SBA.
- **3) Please note:** Not all First Draw Holds can be cleared without documentation.
- 4) Please refer to the enclosed instructions and Table 1 & Table 2 within the SBA Procedure Notice.

2-3 business days from start to finish

- 1) Certify or Clear Hold Day 1
- 2) Submit 2nd Draw Automatically Day 2
- 3) Approval by SBA Day 3







Forgiveness Updates

- Starting 03/05, only new forms and corresponding fields will be accepted.
 Please process all Forgiveness forms in your backlog.
- Many lenders have a large number of legacy forms in their pipelines, and we want to be sensitive to this timing. SBA is allowing for this window.
- Sandbox and Production Proposed implementation dates below:

Change	3508	3508EZ	35088	Sandbox Date	Production Date	Status
-						
3508S to be made available for loans up to						Implemented in
\$150,000			X	1/22/2021	1/22/2021	prod
Add indicator to reflect whether Forgiveness is for					3/5/2021*	Implemented in
First draw or Second draw Loan	X	X	X	1/31/2021		Sandbox
Covered Period - Change from 8 or 24 weeks to				1/31/2021	3/5/2021*	Implemented in
between 8 to 24 weeks	X	X	X			Sandbox
Add NAICS code				1/31/2021	3/5/2021*	Implemented in
	X	X	X			Sandbox
Add Checkbox indicating whether Borrower				1/31/2021	3/5/2021*	Implemented in
(Together with Affiliates) received PPP loans of \$2						Sandbox
MM or More			X			
				1/31/2021	3/5/2021*	Implemented in
Add Amount of Loan Spent on Payroll Costs			X			Sandbox
Remove Alternative Payroll Covered Period start and				1/31/2021	3/5/2021	Implemented in
end dates	X	X				Sandbox
				1/31/2021	3/5/2021	Implemented in
Remove Payroll schedule (weekly, bi-weekly etc.)	X	X	Х			Sandbox
				1/31/2021	3/5/2021	Implemented in
Remove EIDL advance amount	X	X	X			Sandbox
				1/31/2021	3/5/2021	Implemented in
Remove EIDL advance application #	X	X	X			Sandbox
Requirement for Covered period of 2020 PPP loans				1/31/2021	3/5/2021*	Implemented in
ending on or before 12/31/2020, was removed	X	X	X			Sandbox
Add new non payroll expenses in lines 5-8,				1/31/2021	3/5/2021*	Implemented in
cascading changes to calculations	X	X				Sandbox

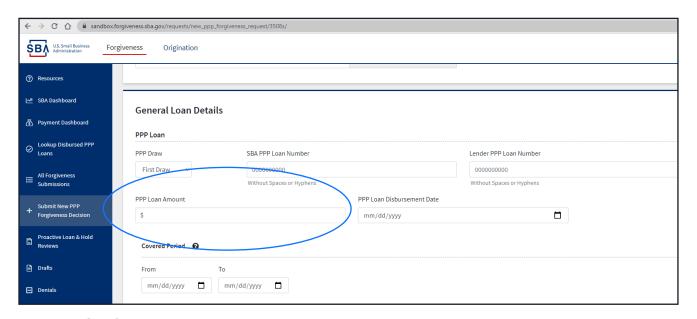
^{*} To enforce / breaking changes







3508S made available for loans up to \$150,000



API Endpoint:

idpoint: Field:

POST /api/ppp_loan_forgiveness_requests/

bank_notional_amount Number Mandatory

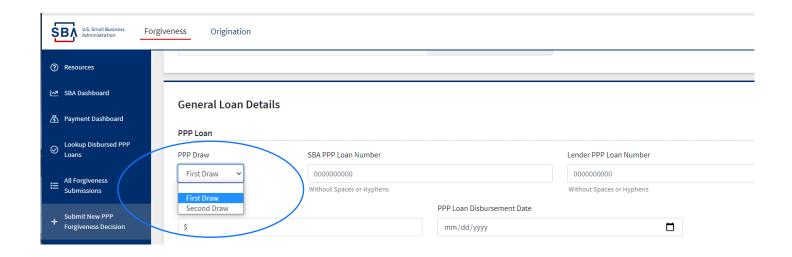
- SBA doesn't require Borrowers to use 3508S for Loan amount up to 150K.
- Borrowers can still use EZ or Full form for any Loan amount, depending on their situation.







Added indicator to reflect whether Forgiveness is for first draw or second draw loan (3508, 3508EZ, 3508S)



API Endpoint:

POST /api/ppp_loan_forgiveness_requests/

Field:

ppp_loan_draw Number Mandatory

Please Note:

For Second Draw PPP Loans in excess of \$150,000, the borrower **must submit** its loan forgiveness application for the First Draw PPP Loan before or simultaneously with the loan forgiveness application for the Second Draw PPP Loan, even if the calculated amount of forgiveness on the First Draw PPP Loan is zero.







Covered Period - Change from 8 or 24 weeks to between 8 to 24 weeks (3508, 3508EZ, 3508S)



- Borrowers who received loans in 2021 and borrowers who received loans in 2020 but have
 not yet applied for forgiveness are eligible to select the length of their covered period for a
 time period beginning on the date of disbursement of the loan and ending on a date that is
 at least 8 weeks but no more than 24 weeks later. Borrowers may apply for forgiveness
 once their selected covered period has expired
- Requirement for 2020 Loans to have Covered period end on or before 12/31/2020, was removed







Add NAICS Code (3508, 3508EZ, 3508S)

NAICS Code			
Enter Business Industry			
API Endpoint:	F	ield:	
POST /api/ppp_loan_forgiveness_requests/	naics_code	Number	Mandatory

- NAICS code is validated against standard list of SBA supported NAICS codes
- API users can use GET /api/naics/?code=NNNNNN to validate NAICS code upfront, as per their design preference







Add Checkbox indicating whether Borrower (Together with Affiliates) received PPP loans of \$2 MM or More

Borrower (with Affiliates) received PPP loan(s) in excess of \$2 million.				
☐ Check the box if Borrower (Together wi Loans of \$2 Million or More or Second D	th Affiliates, if Applicable) Received First Draw PPP Draw PPP Loans of \$2 Million or More.			
API Endpoint:	Field:			
POST /api/ppp_loan_forgiveness_requests/	forgive_2_million	Boolean		

- This checkbox was already present for 3508 and 3508EZ form.
- As part of 03/05 release, 3508S form will also support this Checkbox







Add Amount of Loan Spent on Payroll Costs

Amount of Loan Spent on Payroll Costs			
\$		0	
ADI Following		Ciold.	
API Endpoint:		Field:	
POST /api/ppp_loan_forgiveness_requests/	forgive_payroll		Number Mandatory
rosi /api/ppp_ioaii_ioigiveness_requests/			

- Loan spent on Payroll field was already present in 3508 and 3508EZ form.
- As part of 03/05 release, 3508S form will also support this field
- PPP funds spent on Payroll should be at least 60% of the Forgiveness amount.







Add new non payroll expenses in lines 5-8, cascading changes to calculations



API Endpoint:

POST /api/ppp_loan_forgiveness_requests/

Fields:

for give_covered_operations_expenditures	Number	Mandatory (for 3508, 3508EZ)
forgive_covered_property_damage_costs	Number	Mandatory (for 3508, 3508EZ)
forgive_covered_supplier_costs	Number	Mandatory (for 3508, 3508EZ)
forgive_covered_protection_expenditures	Number	Mandatory (for 3508, 3508EZ)

Please Note:

New document types added for support additional expenditures

ID	NAME
49	Forgiveness Supporting Docs (Covered Worker Protection Expenditures)
48	Forgiveness Supporting Docs (Covered Property Damage Costs)
47	Forgiveness Supporting Docs (Covered Supplier Costs)
46	Forgiveness Supporting Docs (Covered Operations Expenditures)







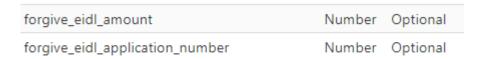
Remove Alternative Payroll Covered Period start and end dates



Remove Payroll schedule (weekly, bi-weekly etc.)



Remove EIDL advance amount and application number



- In Post API call, above fields will be removed (POST /api/ppp_loan_forgiveness_requests/)
- In Get API call, above fields will continue to remain to support data submitted via old forms (GET /api/ppp_loan_forgiveness_requests/)







Other Platform Updates

Max Loan Calculation Control

With updated guidelines by SBA, this control was enhanced and should eliminate concerns on the calculation limiting service corner case loan situations.

Optimization of duplicate DUNS

- The SBA has recently optimized Duplicate DUNS validation process. Please look at your pending loan portfolio in the platform or review the updated status to check the current state of these PPP loans.
- If you had previously withdrawn loans related to duplicate DUNS errors, please resubmit these as appropriate into the platform. Do not resubmit anything on the platform already; these should have been processed, or will be. We have less than 20 that still need reprocessed.

ITINs for primary borrower

- Support for IRS issued ITINs is now available in production through both UI and API.
- ITINs are now also supported at the **primary borrower level** for PPP loan applications.
- ITIN's support for principal was already made available on Feb 20th







FAQ Questions

1) Error message for "application already submitted" – we've checked with borrower, no other application submitted, and no other application listed on SBA site. How do we clear?

2) SSN/EIN type error – how do we get corrected when the 1st draw is another financial institution?









Industry Feedback & Policy Items

Feedback Items	Guidance
NAICS codes valid in IRS tax forms may not be accepted since they are not defined in SBA NAICS list	SBA has guided to utilize the NAICS found in the SBA/Online sources.
SBA Hold Reasons and process is not transparent to lenders	SBA now provides lenders with detail hold reasons and actionable resource to clear First Draw Loans. SBA is clearing these holds upon confirmation and supporting documentation from Lenders. Positive feedback from Lenders on this process expansion.
Foreign address or iTIN not supported	ITIN supported now at both borrower and principal level.
Loan cannot exceed more than 35K per employee	Agency has removed this check now.
More robust data controls and entity enforcement structure for this round than previous PPP Loans.	Data quality controls during this round are important to ensure back-end public record searches remain at their highest quality. Agency continues to work toward optimization where possible.
SBA Not Approved Loans	SBA introduced Lender Certification process to support the resolution of Compliance Check Error Messages
Forgiveness Form Updates	Transition period is being supported by SBA to provide large lenders time to work through the backlog of old forms. A balancing act to allow old form submission with allowance for dollar amounts of new 3508S.

