

June 9, 2020

The Honorable Steven Mnuchin
Secretary
U.S. Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

The Honorable Jovita Carranza
Administrator
U.S. Small Business Administration
409 3rd Street, S.W.
Washington, D.C. 20416

Dear Secretary Mnuchin and Administrator Carranza:

The Tennessee Bankers Association along with the associations and economic development organizations noted at the conclusion of this letter are writing on behalf of our members to express our concerns with the Paycheck Protection Program (PPP) loan forgiveness process. The process as outlined in SBA's recently released guidance is unnecessarily burdensome on Tennessee's small businesses, and we urge you to consider a streamlined process for loans under \$250,000. We are concerned that the current process will require even the smallest PPP borrowers to hire outside experts in order to realize the purpose of the program and receive forgiveness of their loan. Due to this technical and burdensome process, businesses will struggle to complete these applications in a timely manner. The complexity also increases the possibility of minor mistakes, which could lead to forgiveness being denied.

We believe it would best serve the interests of small business owners, taxpayers, and Congress's policy objectives to consider making the loan forgiveness process easier and less technical for smaller borrowers, whose businesses are already at risk because of COVID-19. We urge you to consider a threshold of \$250,000, under which borrowers with outstanding loans may receive 100% PPP loan forgiveness through completion of a "PPP-EZ form"—a simple one-page attestation—acknowledging that they spent the majority of PPP funds as outlined in the guidance and consistent with their PPP application. Additionally, borrowers should be required to retain documentation for three years, not the proposed six years, to be in-line with current IRS requirements.

In addition to relieving these small businesses of the significant time and expense required by the guidance, this streamlined approach for loans will also relieve the SBA from an enormous administrative burden created by millions of requests for forgiveness.

We are confident that a streamlined process can be created by Treasury and SBA that would comply with the plain language of the CARES Act yet not unnecessarily burden small businesses. We also encourage quick action before these small businesses expend precious resources hiring outside expertise to assist them with the very burdensome process currently outlined in the interim final rule.

Please contact me at cbarrett@tnbankers.org if you have any questions. Thank you for your consideration of this request.

Sincerely,



Colin Barrett
President and Chief Executive Officer
Tennessee Bankers Association

Joined by:

American Council of Engineering Companies of Tennessee
Chattanooga Area Chamber of Commerce
Insurors of Tennessee
Johnson City Chamber of Commerce
Kingsport Chamber of Commerce
Nashville Area Chamber of Commerce
The Beverage Association of Tennessee
Tennessee Association of Rescue Squads
Tennessee Chamber of Commerce and Industry
Tennessee Community Organizations
Tennessee Farm Bureau
Tennessee Farm Winegrowers Alliance
Tennessee Forestry Association
Tennessee Fuel & Convenience Store Association
Tennessee Grocers and Convenience Store Association
Tennessee Home Builders Association
Tennessee Hospitality Association
Tennessee Retail Association

cc:

The Honorable Lamar Alexander
The Honorable Marsha Blackburn
The Honorable Tim Burchett
The Honorable Steve Cohen
The Honorable Jim Cooper
The Honorable Scott DesJarlais
The Honorable Chuck Fleischmann
The Honorable Mark Green
The Honorable David Kustoff
The Honorable Phil Roe
The Honorable John Rose