

Supporting Statement  
U.S. Small Business Administration  
Paperwork Reduction Act Submission  
Paycheck Protection Loan Program  
OMB Control Number 3245-0407

SBA is requesting emergency approval of revisions to the Paycheck Protection Program (PPP) information collection. The revisions, described below, implement changes made under the interim final rule titled “Business Loan Program Temporary Changes; Paycheck Protection Program Revisions to Loan Amount Calculation and Eligibility” (Loan Amount and Eligibility Rule).

**A. Justification**

***1. Explain the circumstances that make the collection of information necessary.***

Section 1102 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Pub. L. 116-136 (March 27, 2020), authorized the Small Business Administration to guarantee loans made by banks or other financial institutions under a new program under Section 7(a)(36) of the Small Business Act titled the “Paycheck Protection Program” (PPP) to small businesses, certain non-profit organizations, veterans organizations, and Tribal business concerns, independent contractors and self-employed individuals adversely impacted by the Coronavirus Disease (COVID-19) Emergency (First Draw Program). SBA’s authority to guarantee PPP loans expired on August 8, 2020.<sup>1</sup> On December 27, 2020, SBA received reauthorization under the Economic Aid to Hard-Hit Small Businesses, Nonprofits, and Venues Act (Economic Aid Act) to resume guaranteeing PPP loans through March 31, 2021. In addition, the act created a new program under Section 7(a)(37) of the Small Business Act – “Paycheck Protection Program Second Draw Loans” (Second Draw Program).

SBA is requesting approval to implement the changes made under the Loan Amount and Eligibility Rule as described below. The application forms in this information collection are specific to the First Draw Program. A separate information collection for application forms specific to the Second Draw Program is approved under OMB Control No. 3245-0417. There is an urgent need to make these forms available as soon as possible since the authority for the program expires on March 31, 2021. Accordingly, SBA is requesting that this submission for OMB review and approval be processed under the emergency procedures set forth in 5 CFR 1320.13.

Summary of Changes

To implement changes made under the Loan Amount and Eligibility Rule, SBA has developed a new application form, SBA Form 2483-C, PPP Borrower Application Form for Schedule C Filers Using Gross Income. First Draw PPP Loan applicants who are Schedule C filers and elect to calculate their loan amount based on gross income will use this application form.

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<sup>1</sup> Authority to provide other benefits under the program, such as loan forgiveness were not impacted by this date and continued to be available to PPP borrowers.

SBA Form 2483, PPP Borrower Application Form, has been revised to:

- Remove the one-year lookback eligibility restriction for non-financial fraud felonies
- Remove the eligibility restriction for delinquent Federal student loan debt
- Provide that applicants who are Schedule C filers and elect to calculate their loan amount based on gross income must use SBA Form 2483-C
- Add the “per location” exception to the employee-based size standard check box
- Clarify that applicants and owners can use an ITIN
- Add instructions on calculating the number of employees
- Use the term “Applicant” consistently throughout

On February 17, 2021, SBA made a *de minimis* change to SBA Form 2483 by relocating the optional demographic information collection box from the last page of the form to the first page of the form.

SBA Form 2484, PPP Lender Application Form, has been revised to conform to the changes made to SBA Form 2483 and to collect the additional information provided by the applicant under the new SBA Form 2483-C.

SBA will be submitting a future request for approval of changes to SBA Forms 3508, 3508EZ and 3508S to incorporate the new definition of “payroll costs” in the Loan Amount and Eligibility Rule. This request will be submitted separately to avoid delaying the implementation of the loan amount calculation and eligibility changes to the application forms and to allow applicants to begin submitting application forms as quickly as possible given the imminent program expiration date.

Except for adjustments to the hour and costs burdens described in item 12 below, no additional changes are being made to this information collection at this time.

## **2. *How, by whom, and for what purpose will the information be used.***

The information collection consists of the following:

SBA Form 2483, *Paycheck Protection Program Borrower Application Form*, collects information from applicants concerning the ownership of the business and from the applicant’s owners of 20% or more, the loan purpose, any applicable history of prior defaulted government debt (except student loan debt), and any applicable criminal history.

SBA Form 2483-C, *Paycheck Protection Program Borrower Application Form for Schedule C Filers Using Gross Income*, collects information from applicants concerning the ownership of the business, the applicant’s gross income, the loan purpose, any applicable history of prior defaulted government debt (except student loan debt), and any applicable criminal history.

SBA Form 2484, *Lender’s Application - Paycheck Protection Program Loan Guaranty*, collects information from lenders concerning the eligibility of the applicant, the applicant’s gross income (if applicable), and the loan terms and conditions. Information collected is used by the lenders to determine the applicants’ eligibility to receive a loan and the eligibility of the use of proceeds. SBA uses the information provided by lenders to ensure compliance with Loan Program Requirements (as defined in 13 CFR 120.10), as modified specifically for this program, and the

Paycheck Protection Program interim final rules, Frequently Asked Questions, SBA notices, and other applicable guidance.

SBA Form 3506, *CARES Act Section 1102 Lender Agreement*, collects information from federally insured depository institutions, federally insured credit unions, and Farm Credit System regulated agricultural lenders (other than the Federal Agricultural Mortgage Corporation) that do not already participate in the 7(a) loan program. Information collected is used by SBA and the Department of Treasury to determine whether these financial institutions are eligible to participate in the Paycheck Protection Program, and to ensure compliance with the terms and conditions of the Paycheck Protection Program. Approved financial institutions are permitted only to make “covered loans” under the Paycheck Protection Program.

SBA Form 3507, *CARES Act Section 1102 Lender Agreement - Non-Bank and Non-Insured Depository Institution Lenders*, collects information from depository or non-depository institutions and certain service providers that have contracted with insured depository institutions to support their lending activities. Non-Bank and Non-Insured Depository Institutions may submit a request to participate in the PPP loan program. Eligible lenders are authorized to participate in the PPP loan program only, and only for the duration of the program. SBA and the Department of Treasury determine the eligibility of Non-Bank and Non-Insured Depository Institution Lenders.

SBA Form 3508, *Paycheck Protection Program - Loan Forgiveness Application*, SBA Form 3508EZ, *Paycheck Protection Program - PPP Loan Forgiveness Application Form EZ*, SBA Form 3508S, *Paycheck Protection Program - PPP Forgiveness Application Form 3508S*. A borrower that received a First Draw PPP loan or Second Draw PPP Loan submits the appropriate version of this completed form or the lender’s equivalent form to its PPP lender. The information is used to determine whether the application meets the criteria for loan forgiveness.

SBA Form 3508D – *Paycheck Protection Program Borrower’s Disclosure of Certain Controlling Interests*. A First Draw PPP Loan borrower that received a loan before December 27, 2020 uses this form to disclose to SBA that a Covered Individual, as defined in the Economic Aid Act, directly or indirectly held a Controlling Interest, as defined in the Economic Aid Act, at the time the borrower submitted its First Draw PPP Loan application to its PPP lender.

[No Form Number] *Lender Reporting Requirements Concerning Requests for Loan Forgiveness*. Lenders participating in the PPP are required to submit information to SBA to support the small business’ requests for forgiveness and the lenders’ decisions to approve or deny those requests. SBA will use the information to determine borrowers’ and lenders’ compliance with PPP requirements and the appropriate amount of loan forgiveness.

[No Form Number] *Lender Reporting Requirements for Loan Review*. For a PPP loan of any size, SBA may undertake a review at any time in SBA’s discretion. SBA will be conducting an initial review of all loans using an automated review tool. After that initial review, SBA will select a sample of loans for review and will also review loans identified as having indicia of circumvention of eligibility requirements and/or attributes that may be indicative of noncompliance with eligibility requirements, fraud or abuse. Additionally, SBA will be reviewing all loans of \$2 million or greater. When a loan is selected for review by SBA, lenders are required to submit information that will allow SBA to determine whether the loan meets PPP

requirements, including borrower eligibility, loan amounts, and eligibility for forgiveness. Some of the requested information (e.g., loan application, forgiveness application and forgiveness supporting documents) will be provided by the borrowers to the lenders.

SBA Form 3509, *Loan Necessity Questionnaire (For-Profit Borrowers)*. All for-profit borrowers that, together with their affiliates, received PPP loans with an original principal amount of \$2 million or greater will be asked to submit additional information as part of the SBA loan review. The information will be used to inform SBA's review of the borrowers' good-faith certifications that economic uncertainty made the PPP loan requests necessary to support their ongoing operations. SBA may request additional information from the lender or the borrower, if necessary, to complete the review. Such information may include a narrative response to SBA explaining the circumstances that provided the basis for the borrower's good-faith loan necessity certification.

SBA Form 3510, *Loan Necessity Questionnaire (Non-Profit Borrowers)*. All non-profit borrowers that, together with their affiliates, received PPP loans with an original principal amount of \$2 million or greater will be asked to submit additional information as part of the SBA loan review. The information will be used to inform SBA's review of the borrowers' good-faith certifications that economic uncertainty made the PPP loan requests necessary to support their ongoing operations. SBA may request additional information from the lender or the borrower, if necessary, to complete the review. Such information may include a narrative response to SBA explaining the circumstances that provided the basis for the borrower's good-faith loan necessity certification.

### ***3. Use of automated, electronic, mechanical, or other technological collection techniques.***

SBA Forms 2483, 2483-C and 2484 are available on the SBA website as PDFs at <https://www.sba.gov/managing-business/forms/lending-forms>. Lenders will also be able to assist applicants by generating the forms through third-party software platforms.

SBA Form 2483: Applicants complete the form (or the lender's equivalent form) and submit it to the lender with any supporting documentation (e.g., listing of any affiliates, details regarding receipt of an SBA EIDL).

SBA Form 2483-C: Applicants complete the form (or the lender's equivalent form) and submit it to the lender with any supporting documentation (e.g., listing of any affiliates, applicant's Schedule C, details regarding receipt of an SBA EIDL).

SBA Form 2484: Lenders complete the form and submit it to SBA electronically via the Paycheck Protection Platform ([forgiveness.sba.gov](https://forgiveness.sba.gov)). Lender must retain the original SBA Forms 2483, 2483-C and 2484 and all supporting documentation in its loan file.

SBA Forms 3506 and 3507: Eligible lenders submit either of these forms as applicable to its circumstances to request approval to participate or determine eligibility for the PPP loan program via email to either [DelegatedAuthority@sba.gov](mailto:DelegatedAuthority@sba.gov) or [NFRApplicationForPPP@sba.gov](mailto:NFRApplicationForPPP@sba.gov).

SBA Form 3508, SBA Form 3508EZ, SBA Form 3508S, and SBA Form 3508D: PPP borrowers will submit the requested information directly to their lenders who will determine how the information is submitted.

Lender Reporting Requirements Concerning Requests for Forgiveness: Lenders will submit the requested documentation and other information by uploading them electronically to SBA via the Paycheck Protection Platform ([forgiveness.sba.gov](https://forgiveness.sba.gov)).

Lender Reporting Requirements for Loan Reviews: Lenders will submit the requested documentation and other information by uploading them electronically to SBA via the Paycheck Protection Platform ([forgiveness.sba.gov](https://forgiveness.sba.gov)).

SBA Form 3509: When SBA notifies the lender of a loan review, SBA will request that the lender obtain a completed questionnaire from the borrower. Borrowers will submit the requested information directly to their lenders who will determine how the information is submitted. After receiving the forms and supporting documentation from the borrowers, lenders will submit the forms and supporting documentation by uploading them electronically to SBA via the Paycheck Protection Platform ([forgiveness.sba.gov](https://forgiveness.sba.gov)). Lenders will also be required to input the information provided by the borrowers on the form into the Paycheck Protection Platform via web form.

SBA Form 3510: When SBA notifies the lender of a loan review, SBA will request that the lender obtain a completed questionnaire from the borrower. Borrowers will submit the requested information directly to their lenders who will determine how the information is submitted. After receiving the form and supporting documentation from the borrowers, lenders will submit the forms and supporting documentation by uploading them electronically to SBA via the Paycheck Protection Platform ([forgiveness.sba.gov](https://forgiveness.sba.gov)). Lenders will also be required to input the information provided by the borrowers on the form into the Paycheck Protection Platform via web form.

#### ***4. Avoidance of duplication.***

There are no known sources of information that could be used for the PPP in lieu of the requested information. The data requested is unique to each lender, applicant or borrower, including principals, and to the circumstances of each particular PPP loan.

#### ***5. Impact on small businesses or other small entities.***

This information collection impacts a substantial number of small businesses and other small entities. However, the information collected is designed to lessen the burden by requesting the minimum information necessary for SBA and lenders to make prudent decisions. The fact that the information is submitted electronically and not in paper form, also helps to mitigate any burden on borrowers and lenders.

#### ***6. Consequences if information is not collected.***

Failure to collect the information requested could result in improper payments if loans are issued to applicants that are not eligible or for purposes that are not authorized, or forgiveness payments are remitted to lenders for ineligible borrowers or ineligible amounts. Failure to collect the

information could also impact SBA's ability to ensure its lending partners are complying with Loan Program Requirements applicable to the PPP.

**7. Existence of special circumstances.**

None of the circumstances are applicable.

**8. Solicitation of public comment.**

In order to implement the changes made by the Loan Amount and Eligibility Rule before the program expires on March 31, 2021, SBA is requesting emergency approval of the revisions to this information collection pursuant to 5 CFR 1320.13; this request includes waiver of the required 60-day and 30-day public comment notices. SBA will follow the standard procedures required by the Paperwork Reduction Act, including publication of the notices before the emergency approval expires.

**9. Payment or gift to respondents.**

No gifts or payments are provided to any respondents.

**10. Assurances of confidentiality.**

The information collected is protected to the extent permitted by law. SBA incorporated various statements required by law and executive orders to advise respondents of, among other things, the protections against disclosure of sensitive and confidential information under the "Freedom of Information Act" (5 U.S.C. § 552), "Right to Financial Privacy Act of 1978" (12 U.S.C. § 3401), and the Privacy Act (5 U.S.C. § 552a), where applicable. Additionally, borrowers completing SBA Form 3509, *Loan Necessity Questionnaire (For-Profit Borrowers)* and SBA Form 3510, *Loan Necessity Questionnaire (Non-Profit Borrowers)*, are instructed to state whether or not the answers and information provided are customarily kept confidential. SBA will use responses provided by the borrowers to assist in maintaining confidentiality, including applicable "Freedom of Information Act" exemptions.

**11. Questions of a sensitive nature.**

Information that is retrieved by a personal identifier is maintained in SBA's Privacy Act System of Records governing the disclosure of such information, specifically SBA 21--Loan System. See

Federal Register Notice at 74 FR 14890 (April 1, 2009) as amended by notices published at 77 FR 15835 (03/16/2012) and 77 FR 61467 (10/09/2012), for details regarding routine uses and other terms governing the use of the information.

**12. Estimate of the hourly burden and cost burden for the collection of information.**

The estimated annual burdens based on the information below is as follows:

Total number of Respondents: 9,305,506

Total number of Responses: 35,679,326  
Total Hours: 9,505,578  
Total Hour Cost for Respondents: \$340,919,813  
Total Cost for Federal Government: \$ 173,124,509

SBA Form 2483

The total estimated number of respondents for this form is 6.472 million based on the estimated number of PPP applications submitted through August 8, 2020, plus an additional 972,000 applicants that SBA projects might apply for new First Draw PPP Loans before the program expires on March 31, 2021. Each respondent submits one application. Estimated time to complete SBA Form 2483 is 8 minutes, yielding 862,933 total annual burden hours. The estimated annual cost burden is \$29,132,629. These estimates are based on a sample testing by 1 or more individuals who were not familiar with the form.

Estimated costs are determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$70,459 or \$33.76 hourly rate based on the 2021 General Schedule for Sacramento California (Base). The GS-11 pay grade is utilized in preparing this estimate as it is equivalent to the position normally held by a white-collar employee in a mid-level position.

SBA Form 2483-C

The total estimated number of respondents for this form is 228,000. Each respondent submits one application. Estimated time to complete SBA Form 2483 is 8 minutes, yielding 30,400 total annual burden hours. The estimated annual cost burden is \$1,026,304. These estimates are based on a sample testing by 1 or more individuals who were not familiar with the form.

Estimated costs are determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$70,459 or \$33.76 hourly rate based on the 2021 General Schedule for Sacramento California (Base). The GS-11 pay grade is utilized in preparing this estimate as it is equivalent to the position normally held by a white-collar employee in a mid-level position.

SBA Form 2484

There are approximately 5,506 lenders making PPP loans, including additional lenders that may be approved to participate going forward. Each approved loan requires one SBA Form 2484 to be completed by the lender. Since an SBA Form 2484 must be submitted with each SBA Form 2483, lenders will submit an estimated 6.412 million Forms 2484. The SBA estimates these lenders will take an average of 25 minutes to complete the form for total burden hours of 2,671,720. The annual estimated costs equal \$90,197,267.

Estimated costs are determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$70,459 or \$33.76 hourly rate based on the 2021 General Schedule for Sacramento California (Base). The GS-11 pay grade is utilized in preparing this estimate as it is equivalent to the position normally held by a white-collar employee in a mid-level position.

SBA Form 3506

For the purpose of the PPP loan program, all federally insured depository institutions, federally insured credit unions, and Farm Credit System regulated agricultural lenders (other than the Federal Agricultural Mortgage Corporation) are eligible to participate in the Paycheck Protection Program. As of August 8, 2020, 751 eligible lenders submitted this form to apply to participate. SBA estimates an additional 24 lenders will submit this form to apply to participate before the program closes on March 31, 2021. The burden associated with the review of this agreement is estimated at 10 minutes for a total estimated burden of 129 hours. The estimated cost burden for these lenders is \$4,361.

Estimated costs are determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$70,459 or \$33.76 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

#### SBA Form 3507

For the purpose of the PPP loan program, a non-insured depository or non-depository financing provider may be eligible to participate in the PPP loan program. As of August 8, 2020, 147 non-insured depository or non-depository lenders and service providers submitted this form to apply to participate in the PPP loan program. SBA estimates an additional 22 lenders will submit this form to apply to participate before the program closes On March 31, 2021. We estimate that for the 169 applicants it will take approximately 25 minutes to review, complete and submit the application to SBA for a total estimated hour burden of 70 hours. The annual cost to complete the form will be \$2,377 at an average wage of \$33.76 per hour.

#### SBA Form 3508

SBA assumes that an estimated 408,106 borrowers, approximately 5.0% of the total number of First Draw PPP Loan and Second Draw PPP Loan borrowers, will submit this application to request forgiveness for all or a portion of their PPP loan. The estimated time for each borrower to respond is 180 minutes to review and complete the form for a total hour burden estimate of 1,224,319 hours. Total estimated cost burden is \$45,471,215. This estimate is based on sample testing by individuals who are not familiar with the form.

Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

#### SBA Form 3508EZ

SBA assumes that an estimated 1.22 million borrowers, approximately 15.0% of the total number of First Draw PPP Loan and Second Draw PPP Loan borrowers, will submit this streamlined application to request forgiveness for all or a portion of their PPP loan. The estimated time for each borrower to respond is 20 minutes to review and complete the form for a total hour burden estimate of 408,106 hours. Total estimated cost burden is \$15,157,072. This estimate is based on a sample testing by individuals not familiar with the form.

Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).



### SBA Form 3508S

SBA assumes that an estimated 6.53 million borrowers, or approximately 80.0% of First Draw PPP Loan and Second Draw PPP Loan borrowers, with loans of \$150,000 and less will use this SBA Form 3508S to apply for forgiveness for all or a portion of their PPP loan. The estimated time for each borrower to respond is 15 minutes to review and complete this form, for a total hour burden of 1,632,426 hours. Total estimated cost burden is \$60,628,287. This estimate is based on a sample testing by individuals not familiar with the form.

Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

### SBA Form 3508D

SBA assumes that approximately 350 First Draw PPP Loan borrowers will submit this borrower's disclosure of certain controlling interests. The estimated time for each borrower to respond is approximately 5 minutes to review and complete the form for a total hour burden estimate of 29 hours. Total estimated cost burden is \$1,083. This estimate is based on a sample testing by individuals not familiar with the form.

Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

### Lender Reporting Requirements Concerning Requests for Forgiveness

The assumption is that all 8.162 million estimated First Draw PPP Loan and Second Draw PPP Loan borrowers will submit a request for loan forgiveness (5% are estimated to use SBA Form 3508, approximately 80% are estimated to use SBA Form 3508S, and the remaining 15% are estimated to use the SBA Form 3508 EZ). Additionally, SBA estimates that 350 First Draw PPP Loan borrowers will submit an SBA Form 3508D.

SBA estimates that it will take lenders about 30 minutes to review the SBA Form 3508 and supporting documentation provided by the borrower to prepare the rationale for the decision on the application, and upload the required documentation to SBA on each of the 408,106 loans for a total of 204,053 hours, with an estimated cost burden of \$7,578,536.

SBA estimates that it will take lenders about 10 minutes to review the SBA Form 3508S, and Second Draw PPP Loan revenue reduction supporting documentation (if applicable), and to upload the required documentation to SBA for each of the 6.53 million borrowers. Total burden hours are 1,088,284 and total costs are \$40,418,858.

SBA estimates that it will take lenders about 15 minutes to review the SBA Form 3508EZ, Checklist for Using SBA Form 3508EZ, and supporting documentation provided by the borrower to prepare the rationale for the decision on the application, and upload the required documentation to SBA for the 1.22 million loans submitted on the 3508EZ, for a total of 306,080 hours, with an estimated cost burden of \$11,367,804.

SBA estimates that it will take lenders about 5 minutes to review the SBA Form 3508D for completeness, and upload or email the completed form to SBA for the 350 borrowers that submit the SBA Form 3508D, for a total of 29 hours, with an estimated cost burden of \$1,083.

The total cost of Lender Reporting Requirements concerning requests for forgiveness is \$59,366,281.

Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

#### Lender Reporting Requirements for Loan Reviews

SBA estimates that approximately 300,000 loans will be selected for loan review prior to forgiveness, based on First Draw PPP Loan and Second Draw PPP Loan borrowers' submissions of SBA Form 3508, SBA Form 3508EZ, or SBA Form 3508S. SBA estimates that it will take lenders about 30 minutes to compile and obtain the requested information to be submitted to SBA, for a total of 150,000 hours, and a total cost of \$5,571,000.

Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

SBA also estimates that, out of the current population of loans, it will review 1.7 million loans with residual balances remaining after forgiveness and those for which no forgiveness application was submitted, as part of lender oversight reviews. SBA estimates that it will take lenders 30 minutes to obtain and compile requested information to be submitted to SBA, yielding 850,000 burden hours. Based on an average cost of \$37.14 per hour for the average wage of a white-collar employee in a mid-level position, these costs are \$31,569,000.

#### SBA Form 3509

Information will be collected for all loans of \$2 million or greater to for-profit borrowers. SBA estimates that approximately 5,000 lenders will submit this information from about 26,000 borrowers. Information will also be collected for all affiliated for-profit borrowers, whose loans amount to \$2 million or greater when aggregated. SBA estimates approximately 11,000 affiliated for-profit borrowers whose loans amount to \$2 million or greater when aggregated will complete the questionnaire. The estimated time for each borrower to compile the data and complete the questionnaire is 1.5 hours; 37,000 questionnaires at 1.5 hours per questionnaire yields 55,500 total hours.

Based on an average wage of \$36.00 per hour, total estimated costs for compiling and completing the questionnaire are \$1,998,000.

The SBA Form 3509 will be reviewed for completeness and submitted to SBA by the lender. SBA estimates 20 minutes to review for completeness and submission of this document, for a total of 12,333 hours. Based on an average cost of \$37.50 per hour for the average wage of a white-collar employee in a mid-level position with an annual rate of \$75,000, the total estimated costs for responding lenders are \$462,500.

The total estimated costs associated with SBA Form 3509 for borrowers and lenders are \$2,460,500.

#### SBA Form 3510

Information will be collected for all loans of \$2 million or greater to non-profit borrowers. SBA estimates that lenders will submit this information from approximately 4,000 borrowers. Information will also be collected for all affiliated non-profit borrowers, whose loans amount to \$2 million or greater when aggregated. SBA estimates approximately 1,000 affiliated non-profit borrowers whose loans amount to \$2 million or greater when aggregated will complete the questionnaire. The estimated time for each borrower to compile the data and complete the questionnaire is 1.5 hours; yielding 7,500 hours. Total estimated costs for compiling and completing the SBA Form 3510 are \$270,000.

Estimated cost is determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$69,761 or \$36 hourly rate based on the 2020 General Schedule for Sacramento California (Base).

The SBA Form 3510 will be reviewed for completeness and submitted to SBA by the lender. SBA estimates 20 minutes to review for completeness and submission of this document, for a total of 1,667 hours. Total estimated costs are \$62,500.

Estimated costs are based on an average cost of \$37.50 per hour for the average wage of a white-collar employee in a mid-level position with an annual rate of \$75,000.

The total estimated costs associated with SBA Form 3510 for non-profit borrowers and lenders are \$332,500.

Based on the information above, the total estimated annual hour and cost burdens for respondents are 8,462,872 hours and \$289,280,000.

#### ***13. Estimate of total annual cost excluding cost included above in number 12.***

There are no start-up, capital or other costs to respondents as a result of this information collection. The PPP lenders must maintain loan documentation in their files; however, SBA does not have enough information to reasonably determine the lenders' estimated cost to retain this information.

#### ***14. Estimated annualized cost to the federal government***

#### SBA Form 2483, SBA Form 2483-C and SBA Form 2484

All PPP loans are approved under delegated authority by the PPP participating lenders. Lenders must submit limited information electronically to SBA and, if the loan passes validation checks, SBA's Paycheck Protection Platform generates a loan number. Contractor support for the collection and processing of additional PPP applications will be \$14,784,000.

#### SBA Form 3506

As of August 8, 2020, 751 lenders submitted this application. SBA estimates an additional 24 lenders will submit this form to apply to participate. The estimated time to review each application is 60 minutes.

At an hourly rate of \$33.76, the total estimated costs to the government for reviewing this application is \$26,164.

Estimated costs are determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$70,459 or \$33.76 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

### SBA Form 3507

There will be an additional cost associated with the collection and the review of this information by federal agency staff and/or contractors. SBA received 147 requests to participate in the PPP from those lenders and service providers submitting SBA Form 3507. SBA estimates an additional 22 lenders will submit this form to apply to participate. Based on the analysis required for this type of lending segment we anticipated 60 minutes at a rate of \$33.76 per hour to assess the data for accuracy and completeness. This will result in an additional cost to the federal government of \$5,705.

### SBA Form 3508, SBA Form 3508S, SBA Form 3508EZ, SBA Form 3508D, Lender Reporting Requirements Concerning Requests for Forgiveness, and Lender Reporting Requirements for Loan Reviews

There will be an additional cost associated with the collection and the review of this information by SBA staff and/or contractors in connection with loan forgiveness approvals and denials, and loan reviews. SBA will be conducting an initial review of all loans using an automated review tool. The estimated cost for the automated review tool review is \$5,000,000.

SBA will be conducting loan reviews on a sample of First Draw PPP Loans and Second Draw PPP Loans of less than \$2 million, all loans of \$2 million or greater, loans where information indicates that the borrower may be ineligible for the loan, the loan amount or loan forgiveness, and in SBA's discretion, certain other loans. SBA estimates approximately 300,000 loans out of the estimated population of 8.1 million First Draw PPP Loans and Second Draw PPP Loans will be reviewed. Based on the analysis required for this type of lending segment we anticipate 120 minutes at a rate of \$37.14 per hour to assess the data for accuracy and completeness. This will result in an additional cost to the federal government of \$22,284,000. Estimated costs are determined by taking the salary for a GS-11, Federal employee's salary of a \$37.14 hourly rate based on the 2021 General Schedule for Sacramento California (Base).

SBA will also review loans with residual balances remaining after forgiveness and those for which no forgiveness application was submitted as part of lender oversight reviews. SBA will use contractor resources to review an estimated 1.7 million loans out of the current population of loans. The cost of contractor support for reviewing these 1.7 million loans is \$13,500,000, however certain lender oversight review costs may be recoverable from lenders.

Additionally, the cost to the federal government to collect information through the PPP Forgiveness Platform (forgiveness.sba.gov) is \$92,790,000.

#### SBA Form 3509

There will be an additional cost associated with the collection and the review of this information by SBA staff and/or contractors in connection with reviews of loans of \$2 million or greater and loans to affiliates aggregating \$2 million or greater. SBA estimates approximately 26,000 questionnaires from for-profit borrowers and 11,000 questionnaires from affiliated for-profit borrowers will be submitted and reviewed by contractors and SBA staff. Cost of this contractor review of the SBA Form 3509 is \$20,458,040.

SBA estimates time for SBA staff to review SBA Form 3509 to be 1 hour, for a total of 37,000 hours. Based on an hourly rate of \$36, total cost of SBA staff review of the SBA Form 3509 will be \$1,332,000.

#### SBA Form 3510

There will be an additional cost associated with the collection and the review of this information by SBA staff and/or contractors in connection with reviews of loans of \$2 million or greater and loans to affiliates aggregating \$2 million or greater. SBA estimates approximately 4,000 questionnaires from non-profit borrowers and 1,000 questionnaires from affiliated non-profit borrowers will be submitted and reviewed by contractors and SBA staff. Cost of contractor review of the SBA Form 3510 is \$2,764,600.

SBA estimates time for SBA staff to review SBA Form 3510 to be 1 hour, for a total of 5,000 hours. Based on an hourly rate of \$36, total cost of SBA staff review of the SBA Form 3510 will be \$180,000.

Total estimated annualized cost to the Federal Government is \$173,124,509.

#### ***15. Explanation of program changes in items 13 or 14 on OMB Form 83-I.***

The total burden hours have increased. This has occurred because by allowing Schedule C filers to calculate their PPP loan amount using gross income instead of net profit, the number of borrowers eligible to receive a PPP loan will increase. Additionally, the estimate of the number of respondents that will submit the Form 2483 has been increased based on actual program performance to date.

#### ***16. Collection of information whose results will be published.***

Business loan data is routinely published on SBA website and may be included in periodic reports to the Congress and/or OMB.

#### ***17. Expiration date for collection of this data.***

This is not applicable; expiration date will be displayed.

#### ***18. Exceptions to the certification on Block 19 on OMB Form 83-I.***

There are no exceptions.

**19. *Collections of Information Employing Statistical Methods***

This is not applicable.