



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

June 15, 2021

Susan Minson
SBA Desk Officer
Office of Management and Budget

Dear Ms. Minson:

Pursuant to the Office of Management and Budget (OMB) procedures established at 5 CFR 1320, SBA requests that OMB review of the non-substantive revisions to the collection of information titled, *Lender Certification for Reinstatement or Correction of Paycheck Protection Program (PPP) Loan*, OMB Control No. 3245-0415, be processed in accordance with section 1320.13, Emergency Processing.

These revisions include clarifying that a lender's ability to reinstate or correct a loan is subject to the availability of funds. This change will help to manage lenders' expectations, especially as funds become depleted. Additional changes include clarifying that an Individual Taxpayer Identification Number (ITIN) is an acceptable Taxpayer Identification Number for the Borrower and removing an outdated reference to the expiration of authority for the PPP. Also, the form has been revised in light of the new 2021 origination process for PPP loans, where loans are processed through SBA's Paycheck Protection Platform, rather than directly through SBA's ETRAN system.

SBA has determined that the revisions are necessary prior to the expiration of time periods established under Part 1320 to complete the OMB review process. The information is essential to the SBA's ability to evaluate lenders' requests for reinstatement of PPP loans that were cancelled in SBA's ETRAN system due to lenders' data input errors and/or correction of lenders' data input errors made when entering the SBA Loan Approval Amount of PPP loans in ETRAN or the Paycheck Protection Platform, subject to availability of funds.

SBA has been accepting forgiveness decisions from lenders and making forgiveness payments on PPP loans and recognized that there is a need for the revisions to help ensure, among other things, that Lenders submit the appropriate information that SBA needs to review the correction or reinstatement requests. In light of the ongoing need to review such requests, approval of this revised information collection without having to go through the standard Paperwork Reduction Act review procedures will have an immediate benefit for lenders, enhance the integrity of the program, and improve SBA's oversight and monitoring responsibilities.

SBA requests approval of these non-substantive revisions by June 30, 2021. According to OMB guidance,¹ the agency is not required to solicit public comment for non-substantive revisions to

¹Flexibilities Under the Paperwork Reduction Act for Compliance with Information Collection Requirements (July 22, 2016).

Susan Minson
Page 2

an information collection. However, concurrent with this submission SBA is publishing a 60-day public comment notice in the Federal Register as a prerequisite to submission of this information collection for standard review following expiration of the emergency approval.

Sincerely,

Jihoon Kim
Director, Office of Financial Program Operations