

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

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), 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 original authority to guarantee PPP loans expired on August 8, 2020.¹ On December 27, 2020, SBA received reauthorization under the Economic Aid Act (Pub. L. 116-260) to resume guaranteeing PPP loans through March 31, 2021. Among other things, the Economic Aid Act created a new program under Section 7(a)(37) of the Small Business Act – “Paycheck Protection Program Second Draw Loans” (Second Draw Program). On March 11, 2021, the American Rescue Plan Act was enacted amending various PPP statutory provisions. On March 30, 2021, the PPP Extension Act of 2021 (Pub. L. 117-6) was enacted, extending SBA’s PPP program authority through June 30, 2021.²

This approval is set to expire on August 31, 2025. Although SBA’s PPP program authority has expired, this information collection is still needed for the following reasons: (1) PPP borrowers may apply for forgiveness of their loans up to five years after SBA issued a loan number, which may be as late as 2026; (2) SBA may review a PPP loan at any time; and (3) pending litigation may require the collection of information. SBA recently published an Interim Final Rule on Paycheck Protection Program—Extension of Lender Records Retention Requirements (89 FR 68090, August 23, 2024), extending the PPP loan records retention requirements for PPP lenders to ten years from the date of disposition of each individual PPP loan. Because the PPP lender recordkeeping requirements have been extended, this information collection needs to be extended accordingly. Therefore, SBA is seeking OMB's approval to use this information collection beyond August 31, 2025.

There are no proposed changes to any of the forms other than the following: SBA updated SBA Form 3508, *Paycheck Protection Program - Loan Forgiveness Application*, SBA Form 3508EZ, *Paycheck Protection Program - PPP Loan Forgiveness Application Form EZ*, and SBA Form 3508S, *Paycheck Protection Program - PPP Forgiveness Application Form 3508S* to align with

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

² Authority to provide other benefits under the program, such as loan forgiveness, were not impacted by this date and continue to be available to PPP borrowers.

Executive Order 14168, *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (issued January 20, 2025).

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*, collected 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*, collected 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*, collected information from lenders concerning the eligibility of the applicant, the applicant's gross income (if applicable), and the loan terms and conditions. Information collected was 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 the 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*. 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 3508S, *Paycheck Protection Program - PPP Forgiveness Application Form 3508S*. A borrower that received a First Draw PPP loan or a Second Draw PPP loan submits the completed form or lender's equivalent form to its PPP lender. Alternatively, a borrower may submit an electronic version of the form through SBA's Paycheck Protection Platform (SBA Platform). 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 for Loan Reviews*. Lenders participating in the PPP are required to submit information to SBA to support the small businesses' 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. Additionally, borrowers may use the SBA Platform for submission of the electronic version of SBA Form 3508S under the Direct Borrower Forgiveness Rule (86 FR 40921, July 30, 2021). For borrowers that use the SBA Platform to submit their forgiveness applications, lenders will use the SBA Platform to access the forgiveness applications, perform reviews of the forgiveness applications, issues forgiveness decisions to SBA on these applications, and request forgiveness payments from SBA on these applications.

For a PPP loan of any size, SBA may undertake a review at any time in SBA's discretion. SBA will conduct 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. 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.

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

SBA Forms 2483, 2483-C and 2484 were available on the SBA website as PDFs and lenders were also able to assist applicants by generating the forms through third-party software platforms.

SBA Form 2483: Applicants completed the form (or the lender's equivalent form) and submitted 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 completed the form (or the lender's equivalent form) and submitted 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 completed the form and submitted it to SBA electronically via the SBA Platform (forgiveness.sba.gov).

Lenders 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 submitted 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 or NFRLApplicationForPPP@sba.gov.

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

SBA Form 3508S: PPP borrowers submit the requested information directly to their lenders who determine how the information is submitted. Alternatively, the borrower may submit the electronic equivalent of the SBA Form 3508S through the SBA Platform.

SBA Form 3508D: PPP borrowers submit the requested information directly to their lenders who determine how the information is submitted. Alternatively, the borrower may submit the form through the SBA Platform.

Lender Reporting Requirements for Loan Reviews: Lenders will submit the requested documentation and other information by uploading it electronically to SBA via the SBA Platform. For the Direct Borrower Forgiveness Rule process, lenders will submit information through the SBA Platform.

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.

SBA published the 60-day notice required under 5 CFR 1320.8(d) in the Federal Register on March 18, 2025. The comment period closed on May 19, 2025. No comments were received.

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. 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), 77 FR 61467 (10/09/2012) and 86 FR 23026 (04/30/2021), 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:	1,331,248
Total number of Responses:	1,331,248
Total Hours:	712,451
Total Hour Cost for Respondents:	\$36,655,603
Total Cost for Federal Government:	\$26,007,500

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SBA Form 2483

The total estimated number of respondents for this form is 0 because no further applications can be submitted. The estimated annual hour burden associated with lender records retention is 77,329. The estimated annual cost burden is \$3,978,577.05.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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 0 because no further applications can be submitted. The estimated annual hour burden associated with lender records retention is 1,993. The estimated annual cost burden is \$102,539.85.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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

The total estimated number of respondents for this form is 0 because no further applications can be submitted. The estimated annual hour burden associated with lender records retention is 76,822. The estimated annual cost burden is \$3,952,491.90.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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

The total estimated number of respondents for this form is 0 because no further applications can be submitted. The estimated annual hour burden associated with lender records retention is 6. The estimated annual cost burden is \$308.70.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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 3507

The total estimated number of respondents for this form is 0 because no further applications can be submitted. The estimated annual hour burden associated with lender records retention is 1. The estimated annual cost burden is \$51.45.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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 3508

SBA assumes that an estimated 57,812 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 173,678 hours. The total estimated cost burden is \$8,935,733.10. This estimate is based on sample testing by individuals who are not familiar with the form. The cost per response is \$154.35.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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 3508EZ

SBA assumes that an estimated 173,437 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 58,535 hours. Total estimated cost burden is \$3,011,625.75. This estimate is based on a sample testing by individuals not familiar with the form. The estimated cost per response is \$17.15.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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 3508S

SBA assumes that an estimated 924,999 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, whether

submitting the form to a lender or through the SBA Platform, for a total hour burden of 235,104 hours. The total estimated cost burden is \$12,096,100.80. This estimate is based on a sample testing by individuals not familiar with the form. The estimated cost per response is \$12.86.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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 3508D

SBA assumes that 0 borrowers will submit this borrower's disclosure of certain controlling interests. The estimated annual hour burden associated with lender records retention is 3. The estimated annual cost burden is \$154.35.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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.

Lender Reporting Requirements for Loan Reviews

SBA estimates that approximately 175,000 loans will be selected for loan review before or after forgiveness. 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 88,980 hours, and a total cost of \$4,578,021.00. The estimated cost per response is \$25.73.

The estimated cost used is the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45. 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.

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 and would do so as part of their ordinary and expected course of business practice.

14. Estimated annualized cost to the federal government

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

The estimated annualized cost to the federal government is 0 because the lenders must retain the records.

SBA Form 3506

The estimated annualized cost to the federal government is 0 because the lenders must retain the records.

SBA Form 3507

The estimated annualized cost to the federal government is 0 because the lenders must retain the records.

SBA Form 3508, SBA Form 3508S, SBA Form 3508EZ, SBA Form 3508D, 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 estimates approximately 175,000 additional loans will be reviewed. Based on the analysis required for this type of lending segment we anticipate 120 minutes at a rate of \$51.45 per hour to assess the data for accuracy and completeness. This will result in an additional cost to the federal government of \$18,007,500.

Estimated SBA cost is determined by taking the salary for a GS-11, Step 1 Federal employee's annual salary of \$81,960 or \$39.27 hourly rate based on the 2025 General Schedule for Sacramento California (Base), plus estimated fringe benefits of 31 % of salary, for a total hourly rate of \$51.45.

Additionally, the cost to the federal government to collect information through the SBA Platform (forgiveness.sba.gov) is \$8,000,000.

Total estimated annualized cost to the Federal Government is \$26,007,500.

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

There is a decrease in burden hours because SBA's program authority has expired. SBA Forms 2483, 2483-C, 2484, 3506, and 3507 are being renewed only for records retention purposes.

16. Collection of information whose results will be published.

Business loan data is routinely published on SBA's website and may be included in periodic reports to the Congress and/or OMB. This may include information identifiable to specific borrowers.

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.

Part B. Collections of Information Employing Statistical Methods

This is not applicable.