



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

June 24, 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 revisions to the collection of information titled, *Paycheck Protection Program Affiliation Worksheet*, OMB Control No. 3245-0416, be processed in accordance with section 1320.13, Emergency Processing.

These revisions are necessary to incorporate statutory amendments made by the Economic Aid Act and the American Rescue Plan Act and include adding two additional affiliation waivers to the table in Part B, Section I for eligible news organizations and internet-only publishing organizations and adding a note to that section stating that the same affiliation waivers apply to First Draw and Second Draw PPP loans. SBA also added language to Section II stating that only the employee-based size standard is applicable to Second Draw PPP loans, and added a note setting forth the applicable size standards for Second Draw PPP Loans. SBA revised the note explaining the size standards applicable to First Draw PPP loans. SBA added language to notes 9 through 12, which explain the bases of affiliation, to provide guidance to assist nonprofit organizations in applying the affiliation rules.

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. SBA is in the process of conducting loan reviews; this updated information is essential to the SBA's ability to evaluate the eligibility of Borrowers with affiliates, as defined in SBA's regulations at 13 CFR 121.301(f). The purpose of this Affiliation Worksheet is to collect information from a borrower that answered "YES" to Question 3 on its Paycheck Protection Program (PPP) Loan Application or a borrower for which information available to the Small Business Administration (SBA) indicates that the borrower may have affiliates. SBA requires this additional information regarding the size of the borrower and its affiliates to evaluate the borrower's certification on its PPP Loan Application that it was eligible to receive a PPP loan under the SBA's rules in effect at the time the application was submitted.

In light of the ongoing need to conduct loan reviews of PPP loans, approval of this revised information collection without having to go through the standard Paperwork Reduction Act review procedures will help to ensure that Borrowers have the updated guidance to assist them in applying the affiliation rules. The new information will also enhance the integrity of the PPP and improve SBA's oversight and monitoring responsibilities.

Sincerely,

Jihoon Kim
Director, Office of Financial Program Operations