

CLIENT ALERT

CARES Act Small Business Loans Today: Keeping Up and Ensuring Compliance

Apr.05.2020

Over the past two days, SBA has released in the middle of the night two draft Interim Final Rules as well as a final application and additional guidance – including on affiliation – on the overhauled Paycheck Protection Program (“PPP”) loans, implementing Sections 1102 and 1106 of the CARES Act. Since the passage of the legislation a week ago and with only limited preliminary guidance and now-superseded applications from both Treasury and SBA, businesses and lenders have been scrambling to understand loan eligibility, how to apply, as well as key loan terms. The new SBA Form 2483, confirmation of the applicable affiliation test, and the two draft Interim Final Rules reflect significant developments. With the opening of the PPP application process in the midst of this dynamic process, we are providing a revised and essential summary of the PPP and eligibility questionnaire. ([Updated summary - April 9, 2020](#)) We will also be scheduling a webinar on Tuesday afternoon at 3:00 p.m. Eastern (invitation to follow) with Crowell & Moring as well as from SBA Lender – Live Oak Bank – to provide you with the most up-to-date information of this important program. The Crowell & Moring team is working with clients across many industries since application day one and before, and we hope you will reach out with questions.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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