

Update on Obtaining Loan Forgiveness and New PPP Loans

January 15, 2021

Information being provided is based on our understanding of program requirements as of January 15, 2021 and is subject to change.

Disclaimer

- As a Borrower under the Paycheck Protection Program, it is your sole legal responsibility to comply with all laws and regulations applicable to Borrowers under the Small Business Administration Paycheck Protection Program (SBA PPP).
- Rockland Trust urges SBA PPP Borrowers to closely review the latest SBA PPP law, regulations and guidelines (Guidelines). The Guidelines can be found on the Small Business Administration and the Department of Treasury websites: www.SBA.gov and www.Treasury.gov. Rockland Trust cautions you that the Guidelines are evolving. The Small Business Administration periodically updates the Guidelines. Some updates modify prior Guidelines, other updates provide further clarification.
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- An **On Demand** version of the webcast will be available approximately one day after the webcast, and can be accessed using the same audience link that was emailed to you when you registered

Welcome Comments



Mark Ruggiero

**Chief Financial and Accounting Officer
Rockland Trust**

Mark Ruggiero was appointed Chief Financial Officer in 2019 for Rockland Trust and its holding company, Independent Bank Corp. With 20 years of experience in financial services, Mark was previously the Bank's Principal accounting Officer and Controller. Prior to joining Rockland Trust, he was a manager at Vitale, Caturano & Co. A Certified Public Accountant.

Mark is a member of the Massachusetts Society of CPAs, the American Institute of CPAs and the American Bankers Association Accounting Advisory Committee. He is also a trustee of the Massachusetts Taxpayers Foundation. Mark holds a Bachelor of Science in Accountancy from Bentley University.

Introducing Crowe LLP

Crowe LLP has a team of people focused on understanding the SBA Paycheck Protection Program, and the firm assists its clients with information and advice regarding their handling of PPP Loans.

This webinar presentation provides only a high-level overview of the SBA requirements and does not provide complete information sufficient for compliance with the SBA PPP requirements.

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With You Today:



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Agenda

- Information on the New Legislation
 - New PPP Loans (First Draw)
 - Second Draw PPP Loans
 - Forgiveness for Loans Under \$150,000
- Simple Ways to Achieve Full Forgiveness
- Other Legislative Changes
- Expectations for SBA Audits
- Q&A

Disclaimer

This webinar presentation does not provide complete information sufficient for compliance with the SBA Paycheck Protection Program (the “PPP”), and it does not constitute (and is not a replacement for) consultation with your counsel or other advisors to understand how the requirements of the PPP apply to your specific situation. Participants should seek advice from their own counsel or advisors before acting on information presented.

Neither the Small Business Administration nor the Department of Treasury have finalized guidance regarding requirements of the PPP. Additional information, revisions to the Interim Final Ruling, answers to frequently asked questions, and regulatory rulings continue to be published or revised. The information in this webinar presentation and any related documents is subject to change.

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Changes to the Paycheck Protection Program

Key PPP Information

Funding

Additional \$284.45 billion in new funding

Regulations

SBA issued new interim regulations on January 6, 2021




Application Form

SBA to issue new application form for loans under \$150,000 within 24 days of enactment (January 20, 2021)




Retroactive Effect

All changes are retroactive to existing PPP loans

Changes to Lending and Forgiveness

	<p>New PPP Loans</p> <p>Businesses which did not receive a PPP loan in 2020, are eligible for a First Draw PPP loan</p>
	<p>Second Draw PPP Loans</p> <p>Some businesses will be eligible for a Second Draw PPP loan, if certain requirements are met</p>
	<p>Simplified Forgiveness</p> <p>Process for Forgiveness of loans of \$150,000 and less is streamlined</p>

1. New PPP Loans - Terms and Forgiveness

Eligibility Requirements	Loan Calculation	Eligible Entities
		
<p>Employ no more than 500 employees, unless Borrower meets SBA size standard for their industry</p> <p>Were in operation on February 15, 2020</p> <p>Did not receive a PPP loan in 2020</p>	<p>In general, Borrowers may receive a loan amount of up to 2.5 months of average monthly payroll costs from the 12 months prior to the loan or 2019</p> <p>Seasonal employers may use a 12-week period for average monthly payroll costs</p> <p>Excluding non-U.S. residents and pay over annualized \$100,000</p> <p>Limited to \$10,000,000 (or \$20 million for a corporate group)</p> <p>Same application form as 2020 loan</p>	<p><u>Additional Eligible</u></p> <ul style="list-style-type: none">• Housing cooperative• 501(c)(6)<ul style="list-style-type: none">• Chambers of commerce• Business leagues• Real estate boards• Location marketing organizations• Tribal concerns• News organizations






1. New PPP Loans – Newly Eligible Entities

The following entities are now eligible for PPP loans, if they meet the following requirements:

Entity Type	Requirement
Borrowers who returned all or part of their initial PPP loan	<ul style="list-style-type: none">• May reapply for the maximum amount applicable as long as they have not received Forgiveness• Includes Borrowers whose loan calculations have increased due to changes made by the SBA throughout the program
501(c)(6) organizations and Destination Marketing Organizations (if registered as a 501(c) organization, government entity or political subdivision of a state or local government)	<ul style="list-style-type: none">• The organization does not receive more than 15% of receipts from lobbying and lobbying does not comprise more than 15% of activities• Cost of lobbying does not exceed \$1,000,000 during the most recent tax year that ended prior to February 15, 2020• The organization has 300 or fewer employees
Housing cooperatives (as defined by the Internal Revenue Code of 1986)	<ul style="list-style-type: none">• Employ no more than 300 employees
News organizations – eligible FCC license holders and newspapers with more than one physical location	<ul style="list-style-type: none">• Business has no more than 500 employees per physical location• Affiliation rules are waived as there are no more than 500 employees per location• Publicly-traded news organizations are eligible if the business certifies that the loan will support locally focused or emergency content

2. Second Draw PPP Loans - Terms

Eligibility Requirements	Loan Calculation	Eligible Entities
 <p>Employ no more than 300 employees</p> <p>Demonstrate at least a 25% reduction in gross receipts for either the first, second, third or fourth quarter of 2020, relative to the same quarter in 2019, or for all of 2020 compared to 2019</p> <p>Have used or will use the first PPP loan funds by time second loan is disbursed</p> <p>Were in operation on 2/15/2020</p>	 <p>In general, same as original PPP loan</p> <p>Industries assigned to NAICS code 72 (lodging and restaurants) may receive loans up to 3.5 months of average monthly payroll costs</p> <p>Limited to \$2,000,000 (or \$4,000,000 for a corporate group)</p>	 <p>Same as for new PPP Loans</p> <p>Additional Ineligible</p> <ul style="list-style-type: none"> - Already received a Second Draw loan - Publicly traded - China-related <ul style="list-style-type: none"> - Organized in China - Significant China operations - China resident as board member - Lobbying or think tank - Permanently closed

2. Second Draw PPP Loans Terms

Costs included in calculating gross receipts for the 25% revenue reduction requirement are the following:

- Gross receipts includes all revenue in whatever form received or accrued (in accordance with the entity's accounting method) from whatever source, including from the sales of products or services, interest, dividends, rents, royalties, fees, or commissions, reduced by returns and allowances
 - Generally, receipts are considered “total income” and excludes net capital gains or losses
- Gross receipts do not include the following:
 - Taxes collected for and remitted to a taxing authority if included in gross or total income (such as sales or other taxes collected from customers and excluding taxes levied on the concern or its employees)
 - Proceeds from transactions between a concern and its domestic or foreign affiliates
 - Amounts collected for another by a travel agent, real estate agent, advertising agent, conference management service provider, freight forwarder or customs broker

2. Second Draw PPP Loan Application Documents

Eligibility

- **Documentation required to demonstrate the revenue reduction:**
 - Quarterly income statement for selected quarter in 2020
 - Quarterly income statement for 2019
 - Same quarter as selected in 2020
- Note: Full year may be used, and under \$150K can wait to provide until requesting Forgiveness

Entity

- **Documentation previously submitted to obtain the first PPP loan**
 - Proof of entity type
 - Schedule of ownership (names, percentages)
 - 2019 and 2020 payroll tax reports

Loan Amount

- **2019 calendar year payroll cost report listing all employees and total wages**
 - Applying required annualized \$100,000 caps on eligible compensation
 - Only U.S. residents
 - Third party payroll processors may have special PPP reports
- **Evidence of other payroll costs during 2019**
 - Employer contributions for employee group health life, disability, vision and dental insurance
 - Employer contributions to employee retirement plans

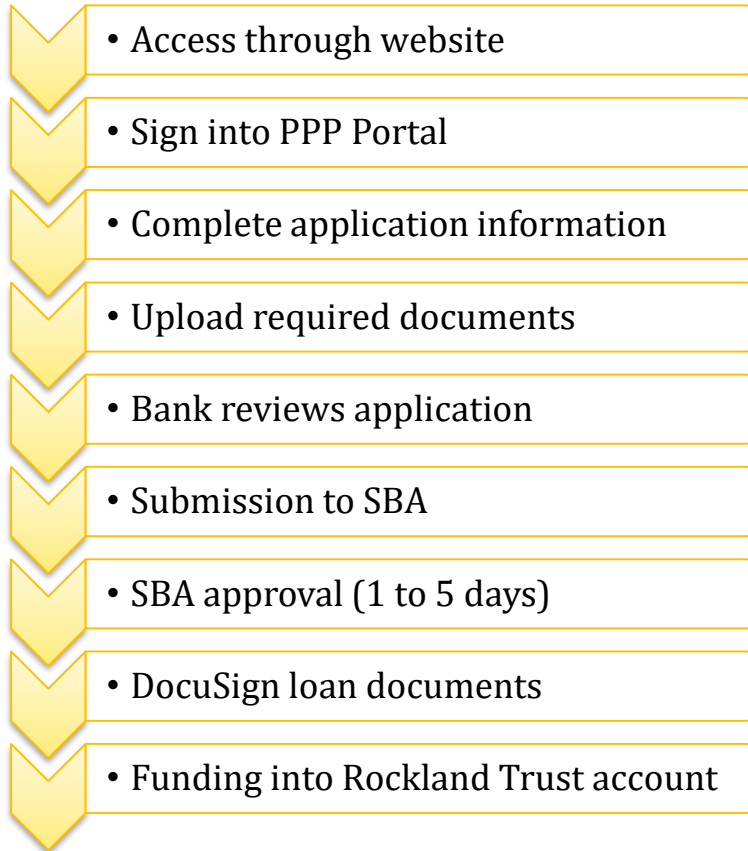
Note: 2020 payroll costs information is allowable as an option

Depending on loan size and business complexity, other documents may be required.

PPP Loans – Other

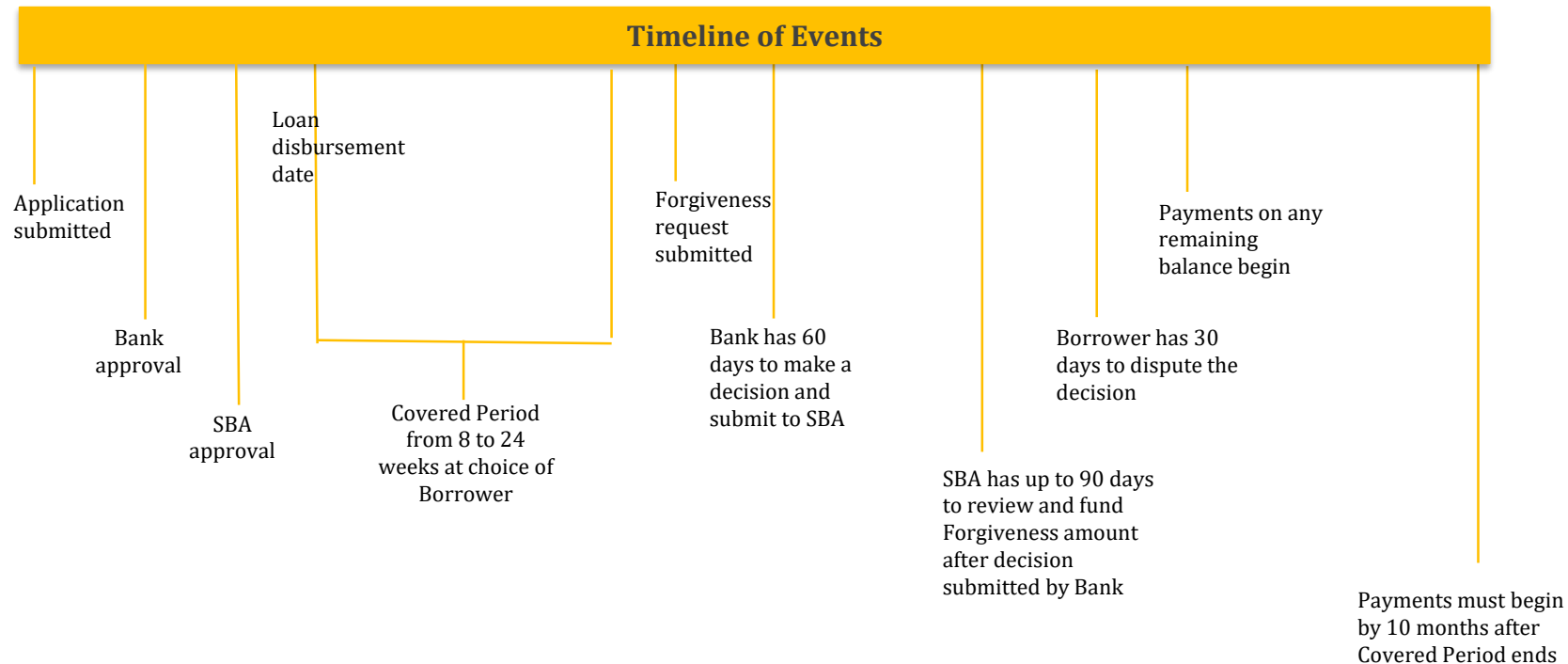
- **Deadline** – PPP loan applications may be approved by the SBA through March 31, 2021
 - SBA has up to 5 days to approve applications
- **Covered Period** – The Covered Period begins when the loan is disbursed and extends for a period of weeks to be determined by the Borrower, between 8 and 24 weeks
- **New Advances** – Borrowers in certain situations may be eligible to advance unused portions of previously approved PPP loans
- **Farmers/Ranchers** - The new legislation establishes a specific loan calculation for the first round of PPP loans for farmers and ranchers who operate as a sole proprietor, independent contractor, self-employed individual, who report income and expenses on a schedule F
 - The entities may use their gross income in 2019 as reported on a Schedule F
 - Lenders may recalculate loans that have been previously approved to these entities if they would result in a larger loan
 - These entities must have been in operation as of February 15, 2020

Process for PPP Loan Application






- Introducing a new user-friendly online application specifically configured for the PPP loans
- Bank will direct Borrowers to a link to the Portal when it is open for applications
- New Portal for PPP loan applications is different from the current Forgiveness Portal

Timeline



3. Forgiveness

Eligible Costs	Calculation	Simplified Process
 <p><u>New Cost Categories</u></p> <p><u>Payroll</u></p> <ul style="list-style-type: none"> • Employee compensation • Owner compensation • Owner contribution to employee benefits • Group benefits <p><u>Nonpayroll</u></p> <ul style="list-style-type: none"> • Mortgage Interest • Rent • Utilities • Operations (software) • Property damage • Suppliers • Worker protection (PPE, etc.) 	 <p><i>Same calculation as original requirements based on accumulated eligible costs during Covered Period</i></p> <p>Payroll costs must be at least 60% of Forgiveness</p> <p>Reductions of Forgiveness</p> <ul style="list-style-type: none"> • Reduction in full-time equivalent (FTE) employees • Decrease in pay rates in excess of 25% 	 <p><u>For Loans of \$150,000 or Less</u></p> <p>One-page certification</p> <p>No documentation submitted</p> <p>Retention of documents</p> <ul style="list-style-type: none"> • 4 years – employee related • 3 years – all other <p><i>Subject to SBA audit</i></p>

3. Forgiveness - Changes to PPP Requirements

- **New Cost Categories Eligible for Forgiveness**

- **Operations:** Payment for any software or cloud computing facilitating business operations, payroll, human resources, sales and billing, or accounting
- **Property Damage:** Costs related to property damage due to public disturbances that occurred in 2020 that are not covered by insurance
- **Supplier Costs:** Expenditures to a supplier pursuant to a contract, purchase order or order for goods in effect prior to obtaining the loan that are essential to the recipient's operations, or for perishable goods a contract or purchase order in effect before or during Covered Period
- **Worker Protection:** Personal protective equipment (PPE) and adaptive investments to help a loan recipient comply with federal health and safety guidelines related to COVID-19 during the period between March 1, 2020 and the end of the national emergency declaration

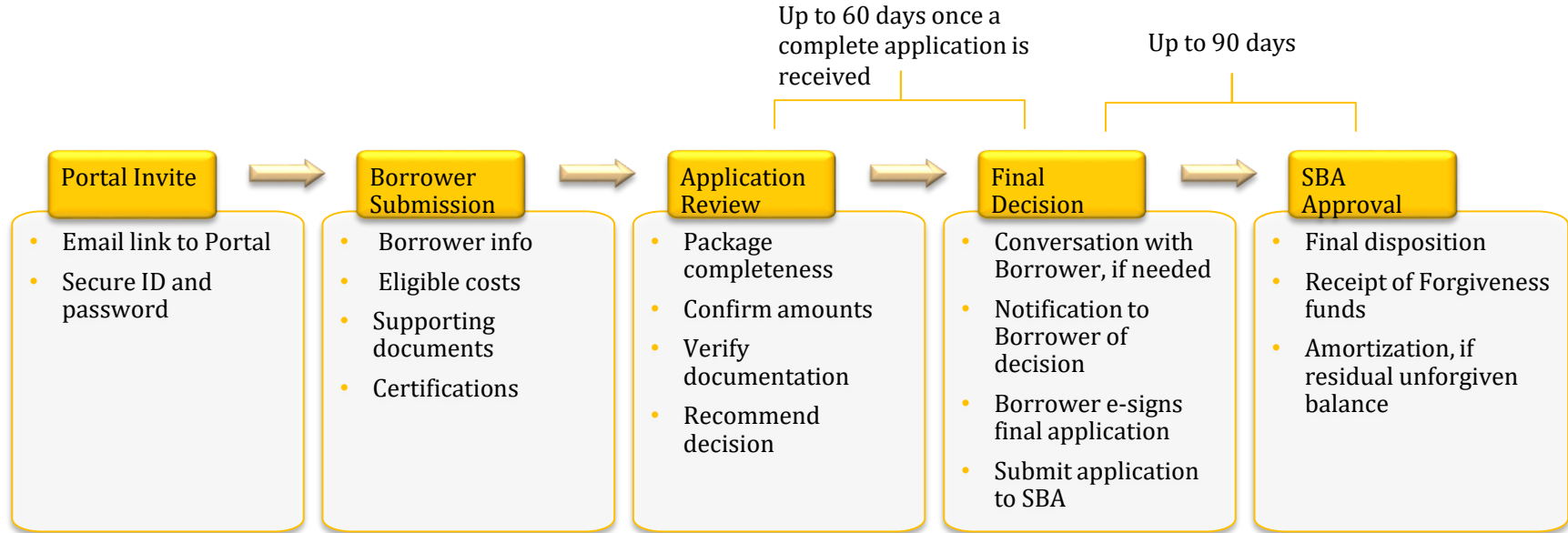
- **Clarifications**

- **Group Benefits:** Employer-provided group insurance benefits are eligible payroll costs including group life, disability, vision or dental insurance
- **Proration of Salaries:** Employee compensation cap of \$100,000 on an annualized basis is prorated during the period in which compensation is paid or incurred
- **Seasonal Employer:** Operate no more than 7 months, or receive 75% of revenue in 6 months

3. Forgiveness - Simplified Process

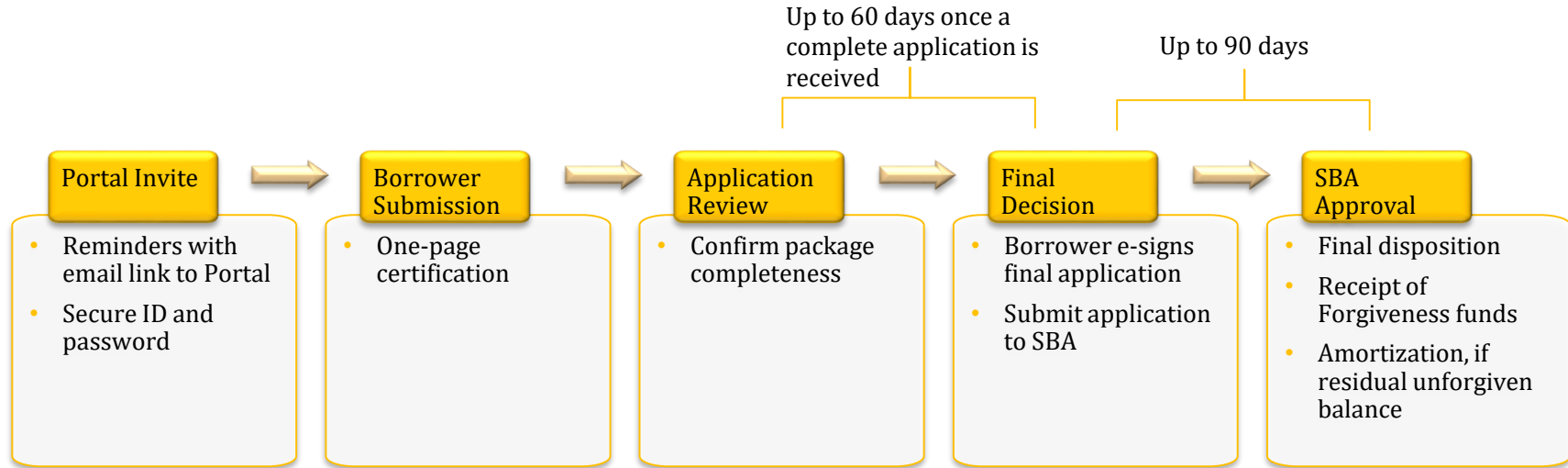
- Simplified Application for Loans under \$150,000
 - A Borrower shall receive Forgiveness if a Borrower signs and submits (to the lender) a certification that is not more than one-page in length including:
 - A description of the number of employees the Borrower was able to retain because of the covered loan
 - The estimated total amount of the loan spent on payroll costs
 - The total loan amount
 - The Borrower must also attest that the Borrower accurately provided the required certification and complied with program requirements
 - Borrowers are required to retain relevant records related to employment for four years and other records for three years
 - Loan audits may still be performed

Current Forgiveness Process Over \$150K



If you have not received your invitation to the Rockland Trust Forgiveness Portal and you received a PPP loan with us in 2020, please reach out to your relationship manager to have the invite resent.

Simplified Process for \$150K or less



3. Forgiveness - Economic Injury Disaster Loan (EIDL) Advances

- **Repeal of EIDL Advance Deduction**

- The new legislation repeals section 1110 (e)(6) of the CARES Act, which requires PPP Borrowers to deduct the amount of their EIDL advance from their PPP Forgiveness amount
- Rules will be issued to ensure Borrowers are made whole if they already received Forgiveness and their EIDL was deducted from their Forgiveness amount
- There will no longer be a residual PPP loan balance for the EIDL Advance

3. Forgiveness – Residual Balance

- Unforgiven residual balances are somewhat less likely due to more eligible costs categories
- For residual balances, if any
 - Disclosure with revised repayment terms will be provided to you as applicable



Simple Ways to Achieve Full Forgiveness

Approaches for Simplifying Forgiveness Applications

In general, the fewer cost categories listed on your Forgiveness application, the less documentation required to support your Forgiveness request. Below are some strategies for simplifying your Forgiveness application and reducing the amount of SBA required documentation.

1. Extend the Covered Period

If you extend your Covered Period beyond 8 weeks (up to at most 24 weeks), you may be able to accumulate enough employee compensation costs to cover the full amount of your loan.

If so, you can simplify your Forgiveness application by only submitting the required documentation for those compensation costs.

3. Achieve Full Forgiveness with Employee Compensation

With a longer Covered Period, Borrowers may be able to accumulate enough employee compensation costs to cover the amount of the loan. In this case, no other documentation needs to be prepared or retained.



2. Limit the Number of Cost Categories Used

You only need to provide supporting documentation for eligible costs sufficient to cover your Forgiveness amount, up to the amount of your original PPP loan. In some cases, especially when the Covered Period is extended to 24 weeks, eligible costs may consist solely of payroll costs.

4. Choose the Simplest Cost Categories to Evidence

If full loan Forgiveness cannot be achieved solely with employee compensation costs, choose the easiest cost categories to evidence first to limit the amount of documentation required to support your Forgiveness request.

1. Employee Benefits
2. Owner Compensation
3. Nonpayroll Costs

Approaches for Simplifying Forgiveness Applications

Along with extending the Covered Period and reducing the number of cost categories, below are other ways to expedite the review process and help Rockland Trust better understand your supporting documentation.

5. Provide Cost Category Summaries

Cost category summaries will help us quickly understand the costs associated with each category on your application. The total in your summary should match the value for that category on your application.

7. Evidence of Costs Being Incurred and Paid

In general, Borrowers must provide supporting documentation evidencing that each cost they are requesting Forgiveness was both incurred and paid during the Covered Period.



6. Highlight Bank Statements

If Bank statements are provided as support of payment of cost categories, please highlight the relevant costs on the statement to make them easily identifiable. If multiple cost categories are on the statement, please make a note on the statement as to which cost the line item applies to.

8. Services and Agreements in Effect Prior to 2/15/20

For non-payroll cost categories, Borrowers must provide evidence that the agreements and services were in effect prior to February 15, 2020. This documentation may include account statements from February 2020, a copy of your current lease, or invoices for the month including February 15, 2020.

Hypothetical Example – Payroll Costs Only

Situation

A business has fifteen U.S. resident employees, each of whom had an annual salary of \$52,000 and two owners, each with an annual salary of \$110,000. The Borrower is using a 16-week Covered Period.

Related benefit costs included in payroll costs amount to \$50,500 for the employees for a 24-week Covered Period. The business received a PPP Loan of \$204,166.67. This Borrower is using the EZ Form to apply for Forgiveness.

Hypothetical Example – Payroll Costs Only (cont.)

Cost Category Included on Forgiveness Application	Amount Listed on Forgiveness Application	Supporting Documentation Requirements	Supporting Documentation Provided
Employee compensation	$\$52,000/52 = \$1,000$ per week, per employee $\$1,000 \times 16\text{-week Covered Period} \times 15 \text{ employees} = \mathbf{\$240,000}$ The Forgiveness amount for employee compensation exceeds the original loan amount of $\\$204,166.67$	1. Summary of payroll	A manual summary showing payments made to each employee during the Covered Period with compensation caps and a total that corresponds to the amount for employee compensation on the application (\$240,000)
		2. Payment of payroll	Bank account statements (with amounts highlighted)
		3. Payroll tax forms (State and Federal) for any quarter having payroll costs included in the Forgiveness amount calculation	Form 941 federal tax filings State quarterly business and individual employee wage reporting and unemployment insurance tax filings reports to the relevant state
		4. Full-time equivalent (FTE) (only required for the Standard Form and Borrowers qualifying for the EZ Form using the second criteria)	Summary report showing the average number of FTE employees for the Covered Period Summary report showing the average number of FTE employees for the chosen reference period AND 941 tax forms for the quarters that overlap with the reference period



Other Legislative Changes

EIDL Program Updates

- Provides additional targeted funding for eligible entities located in low-income communities through the EIDL advance program of the CARES Act
 - Entities in low-income communities that received the EIDL advance under the CARES Act are eligible to receive the amount equal to the difference of what they received under the CARES Act and \$10,000
- Provides funding for eligible applicants that did not receive EIDL because original funding was exhausted before they could receive funds
- Emergency EIDL grants are extended through December 31, 2021
 - Time is extended for the SBA to approve and disburse the Emergency EIDL loans from 3 days to 21 days
- As mentioned previously, the new legislation provides that EIDL advances are not required to be deducted from PPP loan Forgiveness

Grants for Shuttered Venue Operators

- The new legislation authorized \$15 billion for the SBA to make grants available to eligible entities in the entertainment sector including:
 - Live venue operators or promoters
 - Theatrical producers
 - Live performing arts organization operators
 - Museums
 - Movie theatres
 - Talent representatives
- Entities must show at least a 25% reduction in revenues
- Funds will be released in a phased approach with the hardest-hit entities receiving funds first
 - Grants will be given in the first 14 days to entities that have faced a 90% or greater revenue loss
 - A second 14-day period will be reserved for entities that faced 70% or greater revenue loss
 - After these two periods grants will be given to all other eligible entities
- Funds shall be used for eligible payroll, rent, utilities and personal protective equipment (PPE) costs

Receiving this grant makes entities ineligible for a PPP loan



Tax Treatment

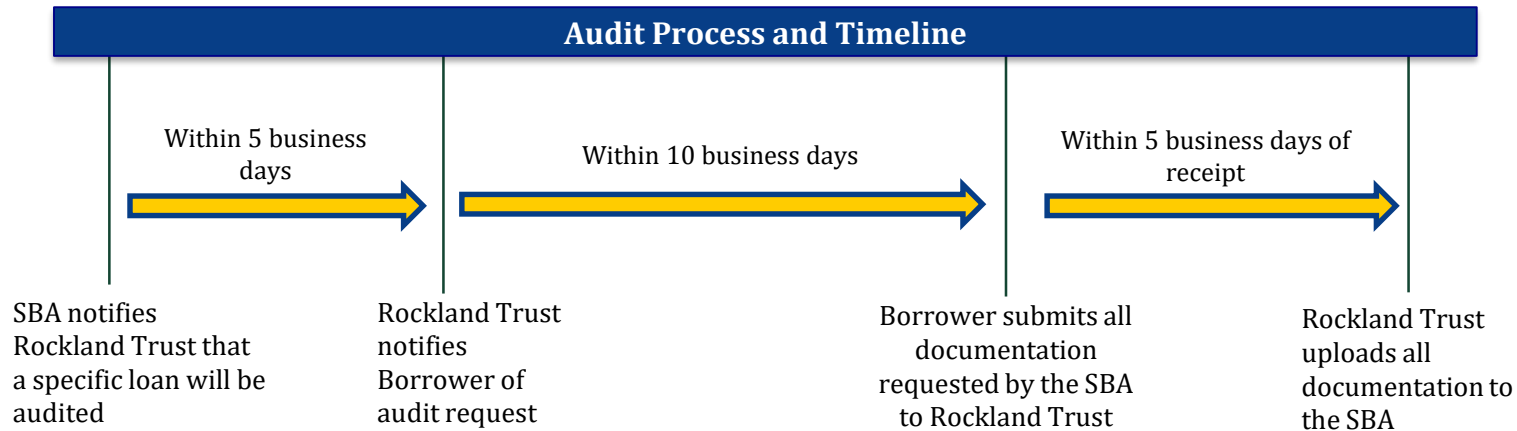
- Forgiveness amount is not taxable income
 - The COVIDTRA clarifies that the non-taxable treatment of PPP loan Forgiveness that was provided by the 2020 CARES Act also applies to certain other forgiven obligations
- Expenses used to support Forgiveness are now tax deductible
 - The COVIDTRA clarifies that taxpayers with PPP loans or other obligations are forgiven as described above, are allowed deductions for otherwise deductible expenses paid with the proceeds and that the tax basis and other attributes of the Borrower's assets won't be reduced as a result of the Forgiveness
- Waiver of information reporting for PPP loan Forgiveness
 - The COVIDTRA allows IRS to waive information reporting requirements for any amount excluded from income under the exclusion- from-income rule for Forgiveness of PPP loans or other specified obligations
- Borrowers with PPP loans may also qualify for the Employee Retention Tax Credit (ERTC) if PPP and ERTC do not cover the same payroll expenditures
- Borrowers may continue to defer payroll taxes until the PPP loan is forgiven
 - 50% of the payroll taxes must be paid by December 31, 2021
 - The remaining 50% must be paid by December 31, 2022



Expectations for SBA Audits

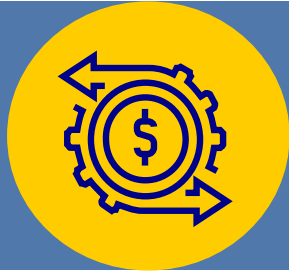
SBA Audit Process

- All loans of \$2 million or more will be audited, and loans under \$2 million will be audited at random
 - With the new simplified application for loans under \$150,000, we expect the number of these loans audited to increase
- If your loan is selected for an audit, the SBA may request documentation that Rockland Trust was not required to request during application review
- Since the SBA requires Borrowers to retain documentation for 3-4 years, it is possible a loan could be audited after Forgiveness is issued



Expectations for SBA Audits

- The SBA will notify Rockland Trust when a loan has been selected for an audit, and Rockland Trust will act as an intermediary between the SBA and the Borrower
- The SBA has been requesting the following documentation when initiating the audit process (if applicable to the Borrower's situation)
- The documentation required by the SBA during an audit *is not limited* to the following:



**Documentation of
Supporting Costs**



**Documentation
Supporting the Necessity
of the Loan**



**Documentation Supporting
Certifications Made on the
Application**

Expectations for SBA Audits – Supporting Costs

Documentation Supporting All Costs Listed on the Application

- Rockland Trust must provide all documentation submitted with the original PPP loan application
- Borrowers must provide documentation that must be retained but not necessarily submitted with the Forgiveness request
- Additional payroll tax filings for the fourth quarter of 2020, even if Q4 tax filings were not originally submitted with the request
- If the original loan amount was covered by payroll costs, for example, but non-payroll cost were also included on the application, the SBA may request documentation supporting all cost categories listed on the Forgiveness application, even if non-payroll costs were not necessary to cover the loan amount

Expectations for SBA Audits – Necessity of Loan

Documentation Supporting the Necessity of the Loan

- A letter explaining the necessity of the loan request and eligibility for a PPP Loan, material compliance with PPP requirements, and any additional context supporting the Borrower's Forgiveness application
- The following must be included:
 - Documentation supporting the Borrower's certifications as to the necessity of the loan request and its eligibility for a PPP loan
 - Documentation necessary to support the Borrower's loan Forgiveness application
 - Documentation demonstrating the Borrower's material compliance with PPP requirements

Expectations for SBA Audits – Certifications (if applicable)

Documentation Supporting Wages Were Not Reduced

- Documentation supporting the certification that annual salaries or hourly wages were not reduced by more than 25% during the Covered Period relative to January 1, 2020 and March 31, 2020 (EZ Form) or the relative reference period (Standard Form)
 - Payroll records that separately list each employee and show the amounts paid to each employee during the period between January 1, 2020 and March 31, 2020 (EZ Form) or the relative reference period (Standard Form)
 - The amounts paid to each employee during the Covered Period

FTE Reduction Exceptions Support

- Documentation regarding any employee job offers and refusals, refusals to accept restoration of reductions of hours, firings for cause, voluntary resignations, written requests by any employee for reductions in work schedule, and inability to hire similarly qualified employees for unfilled positions on or before December 31, 2020

Expectations for SBA Audits – Certifications (if applicable)

Documentation Showing FTE were Not Reduced

- Documentation supporting the certification, if applicable, that the Borrower did not reduce the number of employees or the average paid hours of employees between January 1, 2020 and the end of the Covered Period (other than any reductions that arose from an inability to rehire individuals who were employees on February 15, 2020, if the Borrower was unable to hire similarly qualified employees for unfilled positions on or before December 31, 2020)
- This documentation must include the following:

Documentation Showing Operations were Affected by COVID-19 Orders

- A letter explaining the documentation supporting the Borrower's certification, if applicable, that the Borrower was unable to operate between February 15, 2020 and the end of the Covered Period at the same level of business activity as before February 15, 2020 due to compliance with requirements established between March 1, 2020 and December 31, 2020 related to COVID-19
- The following must be included:
 - **Applicable requirements for each Borrower location**
 - **Relevant Borrower financial records**



Questions

Thank you

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