



Community Bankers Association of Illinois

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SBA Continues to Issue Updates and Guidance on PPP and Other SBA Related Loans

The SBA sent out several new documents late last week and over the weekend. These documents include information on shuttered venue grants, IRS reporting guidance, electronic signatures, 504 fee waivers, updated FAQs and more.

[Paycheck Protection Program \(PPP\) Loans FAQ \(Revised 1/29/2021\) »](#)

- Questions 54-56 on FinCEN, Bank Secrecy Act/Anti-Money Laundering, and public broadcasting stations

[Shuttered Venue Operator Grants - FAQ \(Released 1/27/2021\) »](#)

[Economic Aid Act and 7\(a\) Loan Program Modifications »](#)

[Elimination of 504 Fees »](#)

[Letter Sent to Borrowers on Section 1112 Payments »](#)

[Extension of Temporary Procedures for Closing SBA Loans to Microloan Intermediaries »](#)

[Updated Information on IRS Information Reporting Relating to the Payments Made on Behalf of Borrowers »](#)

[Extension of Guidance on Acceptable Signatures for Microloan Program Notes »](#)

[Extension of Previous Guidance on Acceptable Signatures for Applications and Loan Documents in the 7\(a\) and 504 Business Loan Programs »](#)

We also received the following information this morning from the local SBA regarding how to fix specific issues in the system. They acknowledged that E-Tran is still not working for increases but that system administrators are aware of that problem and are working on it.

[Download below information as pdf version »](#)

Message: Only one PPS loan can exist with DUNS value #

- First look up the Borrower's DUNS number (dnb.com/duns-number/lookup.html). To look it up, select the Other Company search from the drop down. Enter the Borrower's Legal Name and the Borrower's State or as much information as needed to limit the results list. Confirm a match from the list shown and then choose "E-mail DUNS Number". DUNS # will be provided to you within an email.
- If DUNS number is different or business does not have a DUNS #, sign into E-Tran and correct the DUNS there on the last PPP loan. DUNS #'s can be edited and removed.
- After giving E-Tran 24-48 hours to update, withdraw and re-submit the loan request.
- If it is the same as in the denial message, send SBA a message through the portal confirming verification of DUNS # and ask them to approve the request loan.

Message: Dormant Business Identified

- Check Borrower's Legal Name and EIN # is correct.
- If request was submitted with wrong information, then withdraw the request and re-submit.
- If submitted information is correct, check COGS again to confirm it is in good standing.
- If in good standing, send SBA a message via the portal noting verification of good standing and ask for approval of the loan request or a further information about the denial.
- If not in good standing, notify RM to have Borrower return to good standing and then withdraw the request and re-submit.

Message: Potential Match to Sanctions List Identified

- Check Borrower and Principal against OFAC List via FISE access, LexusNexus and/or treasury web page (sanctionssearch.ofac.treas.gov/).
- If there is a hit, review and discuss with Team Lead and RM about final denial.
- If the Borrower and Principals are clear, then send email to SBA via SBA platform with that information and ask them to approve the loan request or provide additional information.

Message: Applicant Potentially Deceased

- Check Principals' names and SSN.
- If entered wrong, withdraw and re-submit with correct information.
- If correct, send message to SBA via portal confirming verification and ask them to approve loan request or provide additional information.

Message: The Borrower has potentially issued more than one PPP loan

- Check Borrower name and EIN number.
- If entered wrong, withdraw and re-submit with correct information.
- If correct, contact RM to confirm with Borrower that they have not submitted elsewhere.
- If correct and not a duplicate, send a message to the SBA via the portal confirming our findings and ask them to approve the loan request or provide additional information.

Message: Disqualifying Bankruptcy Identified

- Check Experian for Borrower and all Principals.
- If report is clean send, RM should check with the Borrower. If Borrower is unaware of any bankruptcy, send an email to SBA via portal with comments asking for them to approve the loan or provide additional information.
- If bankruptcy is noted on report, notify borrower/owners that the application is to be withdrawn and denied.

Message: Affiliate prior government loss

- Run CAIVRS on Borrower and all Principals.
- If report is clean, RM should check with the Borrower. If they are unaware of any prior government loss, send email to SBA via portal with comments asking for them to approve the loan or provide additional information.
- If bankruptcy is noted on report, notify the borrower/owners that the application is to be withdrawn and denied.

Message: The Aggregated PPS Loan Requested Amount exceeds the maximum \$5,000,000

- Guidance from NAGGL and SBA is pending.
- Send an email through the portal asking for clarification.

To get a quick turn around on TIN numbers or SSN that need to be changed by Fresno Servicing:

1. Log into E-Tran; Go to First Draw Loan; Make Corrections; Upload Supporting Documents.
2. File cannot have any spaces or special characters.
3. Email the Fresno Servicing Center, FSC.Servicing@sba.gov, explain the situation without directly stating the Tax ID on it, and let them know you uploaded the supporting documents into E-Tran.

Additional resources can be found at the links below:

[SBA PPP Resource Page »](#)

[Treasury Resource Page »](#)

[CBAI's COVID-19 Resource Center »](#)

