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Application Process

The AICPA, after discussions with its coalition partners, and key banking leaders and stakeholders, is working to drive a common understanding and approach around the firm – lender relationship related to the implementation of the PPP.

Apr. 23, 2020

**PAYCHECK
PROTECTION
PROGRAM**



The American Institute of CPAs (AICPA) has offered Congress some recommendations for the firm-lender relationship related to CPA firms assisting clients in the Paycheck Protection Program (PPP), the small business relief initiative created under the CARES Act.

The AICPA is making these recommendations after discussions with lenders, other stakeholders and the AICPA-led [small business funding coalition](#), which represents members who provide services and support to over 3.5 million businesses that employ more than 75 million people.

The recommendations, which will be posted on aicpa.org, are as follows:

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These are unprecedented times and the joint efforts of lenders and CPA firms are vital to assisting small businesses. Our overall objective is to help drive an effective PPP application process that quickly directs relief funds into the hands of small business owners and their employees.

Based on our collective discussions and our understanding of the intent of the PPP program, AICPA is making the following recommendations related to the firm – lender relationship.

Background:

CPA professionals can add significant value to the PPP loan application process for both lenders and small businesses by assisting and advising their clients in the completion of these applications. Small businesses need support in gathering the appropriate data necessary for completing the applications, and lenders need to know the information has been accumulated, calculated and reviewed in a way that is consistent with PPP loan application guidance. Based on this we encourage CPA firms to offer loan application advisory and assistance services in support of their small business clients.

The CARES Act authorizes the Administrator to determine agency fees to be paid for the assistance in preparation of the loan application. The Act does not require a formal agency relationship between the small business and the CPA as part of the loan assistance and advisory services. It does, however, state that the agency fees are to be paid out of the borrower fee.

Recommendations for Firm– Lender Relationship:

To help advance a clear and orderly loan application process, we're recommending the CPA contact the lender prior to offering assistance and performing advisory work

to the client. This will ensure the lender has agreed to compensate the CPA firm for

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- (i.e., PPP-compliant payroll cost report or master payroll report or other documentation relating to compensation and other eligible payroll costs)
- 2. Calculating average monthly payroll costs in accordance with PPP guidance
- 3. Reviewing final application before submission

The AICPA also provides a [general resource page](#) on PPP for CPA firms.

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