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Paycheck Protection Program (PPP) Loan Forgiveness

Documentation Required for Submission Category **Required Documents Examples**ⁱ 3508 and 3508EZ Applications PPP Loan Forgiveness Calculation Form or PPP Loan PPP Loan Forgiveness Calculation Form Forgiveness Calculation Form 3508EZ SBA Form 3508D *only if* the application is for a First Draw PPP Loan approved on or before August 8, 2020, Forms and the Borrower must disclose a controlling interest. SBA Form 3509 or 3510 only if the borrower, together with its affiliates, received PPP loans with an original principal amount of \$2million or greater. Bank account statements or third-party payroll service provider reports Tax forms or equivalent third-party payroll service provider reports (such as Form 941, state guarterly business and Documents showing eligible cash compensationⁱⁱ during individual employee wage reporting, unemployment the Covered Period; AND **Payroll Costs** Documents showing eligible non-cash benefit insurance tax filings); paymentsⁱⁱⁱ during the Covered Period Payment receipts, cancelled checks, or account statements showing contributions to employee group health, life, disability, vision or dental insurance and retirement plans, if those amounts are included in the forgiveness amount Completed PPP Schedule A and PPP Schedule A Worksheet PPP Schedule A (unless submitting a 3508EZ Payroll Costs (or an equivalent report from your payroll system or payroll Application) processor) Documents showing the average number of FTE employees on payroll per week employed by the Borrower between February 15, 2019 and June 30, 2019: OR Documents showing the average number of FTE employees on payroll per week employed by the Borrower between January 1, 2020 and February 29, Proof of the pay rates and average number of FTE 2020; OR employees on your payroll during the appropriate reference in the case of a seasonal employer, documents showing Payroll period, such as payroll tax filings (such as Form 941), state the average number of FTE employees on payroll per Costs: FTEs quarterly business and individual wage reporting, week employed by the Borrower between February 15, unemployment insurance tax filings, or equivalent payroll 2019 and June 30, 2019; between January 1, 2020 and service provider reports February 29, 2020; or any consecutive 12-week period between February 15, 2019 and February 15, 2020. If you selected the 3508 EZ and checked only the first *box on the qualifications checklist*, documents showing the average number of full-time equivalent employees on payroll employed by the Borrower on January 1, 2020 and at the end of the Covered Period^{iv} (1) Copy of lender amortization schedule and receipts or Documentation proving the existence of obligations and cancelled checks verifying eligible payments from the service prior to February 15, 2020; AND Mortgage Covered Period; or Interest (2) Lender account statements from February 2020 and the Documents showing eligible payments made or incurred Payments Covered Period through one month after the end of the during the Covered Period Covered Period verifying eligible payments

Rent Payments	Documents showing eligible payments made or incurred during the Covered Period Documentation proving the existence of obligations and service prior to February 15, 2020; AND	 (1) Copy of current lease agreement and receipts or cancelled checks verifying eligible payments from the Covered Period; or (2) Lessor account statements from February 2020 and the Covered Period through one month after the end of the Covered Period verifying eligible payments
Utility Payments	Documents showing eligible payments made or incurred during the Covered Period	Copy of invoices from February 2020 and those paid during the Covered Period; receipts, cancelled checks, or account statements verifying eligible payments
	Documentation proving the existence of obligations and service prior to February 15, 2020; AND	
Covered Operations Expenditures	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying eligible payments made for any business software or cloud computing service that facilitates business operations, product or service delivery, the processing, payment, or tracking of payroll expenses, human resources, sales and billing functions, or accounting of tracking of supplies, inventory, records, and expenses
Covered Property Damage Costs	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments, and documentation that the costs were related to property damage and vandalism or looting due to public disturbances that occurred during 2020 and such costs were not covered by insurance or other compensation.
Covered Supplier Costs	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of contracts, orders, or purchase orders in effect at any time before the Covered Period (except for perishable goods), copy of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments
Covered Worker Protection Expenditures	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments, and documentation that the expenditures were used by the Borrower to comply with applicable COVID-19 guidance during the Covered Period

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Category	Required Documents	Examples		
3508S Application				
Forms	PPP Loan Forgiveness Calculation Form	PPP Loan Forgiveness Application Form 3508S		
	SBA Form 3508D <i>only if</i> the application is for a First Draw PPP Loan approved on or before August 8, 2020, and the Borrower must disclose a controlling interest.			
	SBA Form 3509 or 3510 <i>only if</i> the borrower, together with its affiliates, received PPP loans with an original principal amount of \$2million or greater.			

Documents You Need to Maintain but Do Not Need to Submit

Category	Required Documents	
	3508 Application	
Forms	PPP Schedule A Worksheet or its equivalent.	
Payroll Costs	Documentation supporting the listing of each individual employee in PPP Schedule A Worksheet Table 1; including the "Salary/Hourly Wage Reduction" calculation, if necessary.	
Payroll Costs	Documentation supporting the listing of each individual employee in PPP Schedule A Worksheet Table 2; specifically, that each listed employee received during any single pay period in 2019 compensation at an annualized rate of more than \$100,000.	
Payroll Costs	Documentation regarding any employee job offers and refusals, refusals to accept restoration of reductions in hours, firings for cause, voluntary resignations, written requests by any employee for reductions in work schedule, and any inability to hire similarly qualified employees for unfilled positions on or before December 31, 2020.	
Payroll Costs	If applicable, documentation proving your inability 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 or guidance issued between March 1, 2020 and December 31, 2020 by the Secretary of Health and Human Services, the Director of the Centers for Disease Control and Prevention, or the Occupational Safety and Health Administration, related to the maintenance of standards of sanitation, social distancing, or any other work or customer safety requirement related to COVID-19. This documentation must include copies of the applicable requirements for each borrower location and relevant borrower financial records.	
Payroll Costs	Documentation supporting the PPP Schedule A Worksheet "FTE Reduction Safe Harbor 2," proving that you restored FTE employee levels by no later than December 31, 2020, to the levels in the pay period that included February 15, 2020.	
	3508EZ Application	
Payroll Costs	Documentation supporting the certification that annual salaries or hourly wages were not reduced by more than 25 percent during the Covered Period relative to the period between January 1, 2020 and March 31, 2020. This documentation must include 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, and the amounts paid to each employee during the Covered Period.	
Payroll Costs	Documentation regarding any employee job offers and refusals, refusals to accept restoration of reductions in hours, firings for cause, voluntary resignations, written requests by any employee for reductions in work schedule, and any inability to hire similarly qualified employees for unfilled positions on or before December 31, 2020.	
Payroll Costs	If applicable, documentation showing you 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 you were unable to hire similarly qualified employees for unfilled positions on or before December 31, 2020). This documentation must include payroll records that separately list each employee and show the amounts paid to each employee between January 1, 2020 and the end of the Covered Period.	
Payroll Costs	If applicable, documentation proving your inability 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 or guidance issued between March 1, 2020 and December 31, 2020 by the Secretary of Health and Human Services, the Director of the Centers for Disease Control and Prevention, or the Occupational Safety and Health Administration, related to the maintenance of standards of sanitation, social distancing, or any other work or customer safety requirement related to COVID-19. This documentation must include copies of the applicable requirements for each borrower location and relevant borrower financial records.	

Payroll Costs	All records relating to your PPP loan, including documentation submitted with your PPP loan application,
	documentation supporting your certifications as to the necessity of the loan request and eligibility for a PPP loan,
	documentation necessary to support your loan forgiveness application, and documentation demonstrating your
	material compliance with PPP requirements. You must retain all such documentation in your files for six years after
	the date the loan is forgiven or repaid in full, and permit authorized representatives of SBA, including representatives
	of its Office of Inspector General, to access such files upon request.

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Category	Required Documents	Examplesv
	3508S Applicat	tion
Payroll Costs	Documents showing eligible cash compensation ^{vi} during the Covered Period; AND Documents showing eligible non-cash benefit payments ^{vii} during the Covered Period	Bank account statements or third-party payroll service provider reports Tax forms or equivalent third-party payroll service provider reports (such as Form 941, state quarterly business and individual employee wage reporting, unemployment insurance tax filings);
		Payment receipts, cancelled checks, or account statements showing contributions to employee group health, life, disability, vision or dental insurance and retirement plans, if those amounts are included in the forgiveness amount
Mortgage Interest Payments	Documentation proving the existence of obligations and service prior to February 15, 2020; AND	(1) Copy of lender amortization schedule and receipts or cancelled checks verifying eligible payments from the Covered Period; or
	Documents showing eligible payments made or incurred during the Covered Period	(2) Lender account statements from February 2020 and the Covered Period through one month after the end of the Covered Period verifying eligible payments
Rent Payments	Documents showing eligible payments made or incurred during the Covered Period	 (1) Copy of current lease agreement and receipts or cancelled checks verifying eligible payments from the Covered Period; or (2) Lessor account statements from February 2020 and the Covered Period through one month ofter the end of the covered Period.
	Documentation proving the existence of obligations and service prior to February 15, 2020; AND	Covered Period through one month after the end of the Covered Period verifying eligible payments
Utility	Documents showing eligible payments made or incurred during the Covered Period	Copy of invoices from February 2020 and those paid during the Covered Period; receipts, cancelled checks, or account
Payments	Documentation proving the existence of obligations and service prior to February 15, 2020; AND	statements verifying eligible payments
Covered Operations Expenditures	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying eligible payments made for any business software or cloud computing service that facilitates business operations, product or service delivery, the processing, payment, or tracking of payroll expenses, human resources, sales and billing functions, or accounting of tracking of supplies, inventory, records, and expenses
Covered Property Damage Costs	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments, and documentation that the costs were related to property damage and vandalism or looting due to public disturbances that occurred during 2020 and such costs were not covered by insurance or other compensation.

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Covered Supplier Costs	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of contracts, orders, or purchase orders in effect at any time before the Covered Period (except for perishable goods), copy of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments
Covered Worker Protection Expenditures	Documents showing eligible payments made or costs incurred during the Covered Period	Copies of invoices, orders, or purchase orders paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments, and documentation that the expenditures were used by the Borrower to comply with applicable COVID-19 guidance during the Covered Period
Other Records	Records relating to the Borrower's PPP loan	Documentation submitted with the PPP loan application, documentation supporting certifications as to eligibility for a PPP loan, documentation necessary to support the Borrower's loan forgiveness application, and documentation demonstrating the Borrower's material compliance with PPP requirements

Note: these guidelines are based on information from the SBA to date and are subject to change without notice. Loan forgiveness is not guaranteed and is not solely determined by Huntington.

ⁱ This does not represent a complete list of required documents. You may submit all documents available that support your alleged costs and expenses. ⁱⁱ Cash compensation is the sum of gross salary, wages, tips, and commissions; paid leave (not including leave covered by the Families First Coronavirus Response Act); and allowances for dismissal or separation paid or incurred during the Covered Period.

^{III} Non-cash benefit payments include employer contributions to denied-benefit or defined-contribution retirement plans; payment for the provision of employee benefits consisting of group health care coverage, including insurance premiums; and payment of state and local taxes assessed on compensation of employees.

^{IV} FTE employee information is only required for 3508EZ form users if their qualification for the usage of the 3508EZ form stems from their lack of reduction of wages and employees (the second of three criteria for qualifying for the 3508EZ application). In that case, you must provide proof of the average number of full-time equivalent employees on payroll employed on January 1, 2020 and at the end of the Covered Period.

^v This does not represent a complete list of required documents. You may submit all documents available that support your alleged costs and expenses.
^{vi} Cash compensation is the sum of gross salary, wages, tips, and commissions; paid leave (not including leave covered by the Families First Coronavirus Response Act); and allowances for dismissal or separation paid or incurred during the Covered Period.

vⁱⁱ Non-cash benefit payments include employer contributions to denied-benefit or defined-contribution retirement plans; payment for the provision of employee benefits consisting of group health care coverage, including insurance premiums; and payment of state and local taxes assessed on compensation of employees.