



Paycheck Protection Program (PPP) Organizer

Guide to Getting Organized for Loan Forgiveness

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Guide to Getting Organized for Loan Forgiveness

Thank you for choosing Washington Trust Bank (WTB) as your PPP Lender. We had the honor of funding over 5,000 PPP Loans, totaling over \$1.2 billion, and it is a privilege to serve our clients and our communities as we weather this pandemic together. Thank you.

To facilitate your forgiveness process, WTB developed a portal for you to submit your Forgiveness Application. There is an option for the Authorized Signer (i.e. an Owner) to choose a Delegate (i.e. CPA, CFO, or Controller) to assist with the process. However, the Delegate cannot submit the application. Only an Authorized Signer can submit an application and provide all necessary certifications on behalf of the Borrower.

This **Organizer** will provide you with the necessary tools to prepare your Forgiveness Application. It is **Highly Recommended** that the steps outlined herein be completed prior to logging into the WTB Forgiveness Portal. Completing these steps will help ensure the necessary inputs and accompanying information to apply for forgiveness are readily available when navigating the Portal.

Upon submission of the Forgiveness Application, you will see an on-screen message confirming your application has been successfully submitted. Should additional information be needed, you will be contacted via email and would then go back to the Portal to make the appropriate changes and resubmit. Once completed you will receive email confirmation. As you submit your application through the WTB Portal, you will see the amount of forgiveness that will be submitted to the SBA. According to the guidelines provided by the SBA, once all supporting documentation for your application has been obtained, lenders have 60 days to complete the review process and render a forgiveness decision.

WTB will notify you by email when its forgiveness decision has been made and submitted to the SBA. WTB will then notify the SBA of its forgiveness decision for your PPP Loan. The SBA has 90 days to respond with a final forgiveness decision. Once a decision has been rendered by SBA, WTB will notify you.

As always, your best source of support will be your WTB Relationship Manager. Please do not hesitate to reach out if you have any questions about the process.

High Level Steps

It is highly recommended that this **Organizer** and the **Checklist** be thoroughly read and understood; and that it be used in conjunction with a forthcoming **PPP Loan Forgiveness Portal User Guide** to help navigate through the Forgiveness Application Process. The Portal User Guide will provide best practices and tips and will walk you through the Portal. We recommend that you consult with your financial advisors in advance if you have any questions regarding the application.

Steps to best prepare yourself with the Forgiveness Application Process are below.

Additional information on each of the steps are later detailed:

1. Thoroughly read through this Organizer (and have your Delegate do so if applicable).
2. Determine if you will be filing either the **Direct Form 3508EZ** or **Direct Form 3508**. Links to applications are below.
3. Use the **Organizer** and **Checklist** as tools to gather all pertinent documentation related to the Forgiveness Application inputs and individually name and save each document, regardless of whether these need to be submitted or retained for your records.

Complete a “draft” application. Again, it is Highly Recommended that this be done prior to registering for the Portal in order to be fully prepared and expedite your process. Application and pertinent information can be found at watrust.com/CaresAct.

Preparing for the Forgiveness Application Process

As previously mentioned, it is highly recommended you or your Delegate(s) thoroughly read through this Organizer and the Checklist, and that it be used in conjunction with our PPP Loan Forgiveness Portal User Guide to help navigate you through the Forgiveness Application process.

Step 1: Determine whether you will use Direct Form 3508EZ or Direct Form 3508 to apply for loan forgiveness.

Borrowers who meet any one of the three criteria below should apply for forgiveness with the Direct Form 3508EZ. Borrowers who do not meet any of the three criteria will need to use Direct Form 3508 to apply.

- The Borrower is a self-employed individual, independent contractor, or sole proprietor who had no employees at the time of the PPP loan application and did not include any employee salaries in the computation of average monthly payroll in the Borrower Application Form (SBA Form 2483).
- The Borrower did not reduce annual salary or hourly wages of any employee by more than 25 percent during the Covered Period or the Alternative Payroll Covered Period (as defined below) compared to the period between January 1, 2020 and March 31, 2020 (for purposes of this statement, “employees” means only those employees that did not receive, during any single period during 2019, wages or salary at an annualized rate of pay in an amount more than \$100,000); **AND** 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.

With two exceptions:

- Ignore 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.
- Also ignore reductions in an employee’s hours that the Borrower offered to restore and the employee refused. See 85 FR 33004, 33007 (June 1, 2020) for more details.
- The Borrower did not reduce annual salary or hourly wages of any employee by more than 25 percent during the Covered Period or the Alternative Payroll Covered Period (as defined below) compared to the period between January 1, 2020 and March 31, 2020 (for purposes of this statement, “employees” means only those employees that did not receive, during any single period during 2019, wages or salary at an annualized rate of pay in an amount more than \$100,000); AND The Borrower was unable to operate during 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.

You can access the [3508EZ Application here](#) and the [instructions here](#).

You can access the [3508 Application here](#) and the [instructions here](#).

Step 2: Gather Documentation

The [PPP Forgiveness Checklist](#) will serve as a useful tool in helping you to compile the information needed. Use the [Checklist](#) as a tool to gather all pertinent documentation related to Forgiveness Application input and individually name and save each document regardless of whether they need to be submitted through the Portal or retained for your records. As applicable to your forgiveness situation, you must provide supporting documentation for the expenses you are seeking with your forgiveness calculations. **You are not required to report payments that you do not want to include in the forgiveness amount.**

Below is a list of the Categories with Subcategories to be used describing documentation that you may need to upload with your application or maintain for your records. To minimize the risk of delay in the review process, we ask that additional information be provided with each file uploaded in the Name and Description sections that will be more fully described in the User Guide. Please note that all pertinent source documents will need to be retained in your files for **six years** after the loan is forgiven or repaid in full.

Category: Payroll

(required for both Direct Form 3508EZ / 3508 applicants)

Subcategories:

- Cash Compensation
- Health Insurance
- Retirement Contributions
- State and Local Taxes Assessed on Compensation
- Compensation to Owners
- Self-Employed/Independent Contractors/Sole Proprietorships with No Employees- Upload 2019 Schedule C or F to “Cash Compensation”

Category: Non-Payroll Category

(required for both Direct Form 3508EZ / 3508 applicants)

Subcategories:

- Mortgage Interest
- Rent/Lease
- Utilities
- Other

Category: FTE Category

Subcategories:

- Covered Period (or Alternative Covered Period)
 - Required for both Direct Form 3508EZ (see bullet below for applicable situation) and 3508 applicants.
 - **If you only met Criteria 2 of the 3508EZ** eligibility requirements, please provide documentation 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.
 - Direct Form 3508 applicants that have no reduction in employees or average paid hours.
- Reference Period
 - Not applicable for Direct Form 3508EZ applicants.
 - Not applicable for Direct Form 3508 applicants that meet a Safe Harbor. Safe Harbor details are provided on Page 10

Organizational Tips

- Have separately named files for each Subcategory.
- The maximum upload size for each file is 25MB.
- Payroll and non-payroll expenses should be uploaded by subcategories listed above. When organizing files, a cover page itemizing all expenses within each subcategory should be included with supporting documents that are submitted to Washington Trust Bank.
- Highlight the invoice amount that is being included in the forgiveness calculation. This will allow the reviewer to easily verify the expense amount quickly.
- Please be sure to include documentation verifying **Non-Payroll** expenses were in place prior to February 15th, 2020.
- The Portal will have a "Description" box at the Forgiveness Validation Documents page. Please include notes that will be beneficial to the reviewer as we review and validate the information you have provided.

Step 3: Complete a draft of the Forgiveness Application.

It is recommended that this be done prior to registering for the WTB Portal to help ensure you have the necessary information to submit your application for forgiveness.

The Forgiveness Application Process

Please refer to the [Portal User Guide](#) as your in-depth navigation tool for the Forgiveness Application Process as it pertains to use of the Portal. A high level overview is provided below, and your Portal User Guide will walk you through each step in much more detail.

Registering for the Portal

WTB will send an email to the Authorized Signer with the pertinent information required to register for the Portal. This email will be sent through Trust Mail, Washington Trust's secure email system and will come from PPPSupport@watrust.com. You may want to add this sender to your trusted senders. This email will be followed by a second email with a link specific to the authorized signer to Register for the WTB Portal. Your link cannot be used by another individual. If you assign a Delegate, your delegate will receive a unique link to access the portal. You will have full access to the Portal once you are registered. When in the Portal you will see the following tabs:

Instructions Tab: The Authorized Signer may assign Delegate(s) who in turn would then receive a separate link to also register for access to the WTB Portal. This tab will provide a high-level overview of the portal process, submitting your application, and next steps after submission.

Forms Tab: Authorized Signer or Delegate(s) chooses which Application will be filled out and submitted based on the criteria described earlier.

Borrower Demographics Tab: This includes a form for voluntary disclosure of [Borrower Demographics](#), to include veteran, gender, race and ethnicity data.

Additional Business Information Tab: The Paycheck Protection Program is a loan designed to provide a direct incentive for small businesses to keep their workers on the payroll. This information will allow us to understand and report the impact of the program. This information will be voluntary. For your primary location, with the option to include any secondary locations, please include the following:

- Primary Physical Address
- 2019 Gross Annual Revenue
- Farm or Ag Business – yes or no
- State & County
 - County options will be based on state selected. (If your State & County are not listed, you do not need to further complete.)
- Annual Salary Threshold will [prefill](#) based on State & County selected
- # of Employees whose salary is greater than threshold
- # of Employees below threshold

Forgiveness Validation Documents Tab: Input your required PPP Forgiveness Validation Documents on this page, as described above

Loan Forgiveness Inputs Tab: Input necessary information that will flow to your Forgiveness Application

- Submit Forgiveness Application
- The inputs are described in additional detail in the following section

Loan Forgiveness Inputs Tab – Information Needed

The following items will be needed for both the Direct Form 3508 and Direct Form 3508EZ:

- SBA Loan Number- Washington Trust will input
- Lender Loan Number- Washington Trust will provide in advance via secure email
- PPP Loan Amount- Washington Trust will provide in advance via secure email
- PPP Loan Disbursement- Washington Trust will input
- Employees at time of Loan Application- Should match your original application
- Employees at time of Forgiveness Application
- Economic Injury and Disaster Loan (EIDL) Number and Advance Amount (if applicable, see clarification below under Important Terms to Know)
- Payroll Schedule- Define frequency of the borrower's payroll period
- Beginning Date of Covered Period will match your loan disbursement date
- Ending Date of Covered Period- Automatically calculates 24-weeks from the disbursement date
- If total PPP loans to Borrower (together with Affiliates, if applicable) exceed \$2,000,000, there will be a box to check
- Alternative Payroll Covered Period- See definition in Important Terms to Know below

Important Terms to Know

Economic Injury and Disaster Loan (EIDL): The SBA is required to reduce the Borrower's loan forgiveness amount by the amount of the EIDL Advance (Advances are capped at \$10,000). If an EIDL Advance was received **before** you applied for a PPP loan, then the PPP loan amount requested should have been reduced by the amount of the EIDL Advance. Therefore, the full amount of the PPP loan may be requested for forgiveness. However, if you received an EIDL Advance **after** you applied for your PPP loan, then the SBA will deduct the amount of the EIDL Advance from the forgiveness amount remitted by SBA. One point of clarification is that if an EIDL **Loan** (not to be confused with **Advance**) was received, the **EIDL loan** would be repaid separately and would not impact the PPP loan (assuming it was funded after April 3, 2020).

Covered Period: The Covered Period is either: (1) the 24-week (168-day) period beginning on the PPP Loan Disbursement Date, or (2) if the Borrower received its PPP loan before June 5, 2020, the Borrower may elect to use an eight-week (56-day) Covered Period. For example, if the Borrower is using a 24-week Covered Period and received PPP loan proceeds on Monday, April 20, the first day of the Covered Period is April 20 and the last day of the Covered Period is Sunday, October 4. In no event may the Covered Period extend beyond December 31, 2020.

Alternative Payroll Covered Period: For administrative convenience, Borrowers with a bi-weekly (or more frequent) payroll schedule may elect to calculate eligible payroll costs using the 24-week (168-day) period (or for loans received before June 5, 2020 at the election of the borrower, the eight-week (56-day) period) that

begins on the first day of their first pay period following their PPP Loan Disbursement Date. For example, if using a 24-week Alternative Payroll Covered Period and received PPP loan proceeds on Monday, April 20, and the first day of its first pay period following its PPP loan disbursement is Sunday, April 26, the first day of the Alternative Payroll Covered Period is April 26 and the last day of the Alternative Payroll Covered Period is Saturday, October 10. Borrowers that elect to use the Alternative Payroll Covered Period must apply the Alternative Payroll Covered Period wherever there is a reference in this application to “the Covered Period or the Alternative Payroll Covered Period.” **However, Borrowers must apply the Covered Period (not the Alternative Payroll Covered Period) wherever there is a reference in the application to “the Covered Period” only.** In no event may the Alternative Payroll Covered Period extend beyond December 31, 2020.

Payroll Costs: Total eligible payroll costs incurred or paid during the Covered Period or the Alternative Payroll Covered Period. Borrowers are generally eligible for forgiveness for the payroll costs paid and payroll costs incurred during the 24-week (168-day) or 8-week (56-day) Covered Period (or Alternative Payroll Covered Period) (“payroll costs”). Payroll costs are considered paid on the day that paychecks are distributed or the Borrower originates an ACH credit transaction. Payroll costs are considered incurred on the day that the employee’s pay is earned. Payroll costs incurred but not paid during the Borrower’s last pay period of the Covered Period (or Alternative Payroll Covered Period) are eligible for forgiveness if paid on or before the next regular payroll date. Otherwise, payroll costs must be paid during the Covered Period (or Alternative Payroll Covered Period). For each individual employee, the total amount of cash compensation eligible for forgiveness may not exceed an annual salary of \$100,000, as prorated for the Covered Period. Count payroll costs that were both paid and incurred only once. For information on what qualifies as payroll costs, see Interim Final Rule on Paycheck Protection Program posted on April 2, 2020 (85 FR 20811) (as amended by the Revisions to First Interim Final Rule, posted on June 11, 2020). Include only payroll costs for employees whose principal place of residence is in the United States.

Cash Compensation (included in Line 1 of Direct Form 3508EZ, Lines 1 and 4 of Schedule A, Direct Form 3508): The sum of gross salary, gross wages, gross tips, gross commissions, paid leave (vacation, family, medical or sick 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 or the Alternative Payroll Covered Period. For an 8-week Covered Period, that total is \$15,385. For a 24-week Covered Period, that total is \$46,154. You can only include compensation of employees who were employed by the Borrower at any point during the Covered Period or Alternative Payroll Covered Period and whose principal place of residence is in the United States.

Health insurance (included in Line 1 of Direct Form 3508EZ, Line 6 of Schedule A, Direct Form 3508): Employer contributions for employee health insurance, including employer contributions to a self-insured, employer-sponsored group health plan, but excluding any pre-tax or after-tax contributions by employees. Do not add employer health insurance contributions made on behalf of a self-employed individual, general partners, or owner-employees of an S-corporation, because such payments are already included in their compensation.

Retirement (included in Line 1 of Direct Form 3508EZ, Line 7 of Schedule A, Direct Form 3508): Employer contributions to employee retirement plans, excluding any pre-tax or after-tax contributions by employees. Do not add employer retirement contributions made on behalf of a self-employed individual or general partners, because such payments are already included in their compensation, and contributions on behalf of owner-employees are capped at 2.5 months’ worth of the 2019 contribution amount.

State and local taxes (included in Line 1 of Direct Form 3508EZ, Line 8 of Direct Form 3508):

Employer state and local taxes paid by the borrower and assessed on employee compensation (e.g., state unemployment insurance tax), excluding any taxes withheld from employee earnings.

Owner Compensation (included in Line 1 of Direct Form 3508EZ, Line 9 Schedule A, Direct Form

3508): amounts paid to owners (owner-employees, a self-employed individual, or general partners). For a 24-week Covered Period, this amount is capped at \$20,833 (the 2.5-month equivalent of \$100,000 per year) for each individual or the 2.5-month equivalent of their applicable compensation in 2019, whichever is lower. For an 8-week Covered Period, this amount is capped at 8/52 of 2019 compensation (up to \$15,385). For those clients who have ownership interests in multiple companies, the max total compensation aggregated across all companies is \$15,385 for the 8-week period and \$20,833 for the 24-week period.

Non-Payroll Costs Lines 2, 3, and 4 of both forms: Eligible non-payroll costs must be paid during the Covered Period or incurred during the Covered Period and paid on or before the next regular billing date, even if the billing date is after the Covered Period. **Eligible non-payroll costs cannot exceed 40% of the total forgiveness amount.** Count non-payroll costs that were both paid and incurred only once.

- Covered mortgage obligations: payments of mortgage interest (not including any prepayment or payment of principal) on any business mortgage obligation on real or personal property incurred before February 15, 2020 (“business mortgage interest payments”);
- Covered rent obligations: business rent or lease payments pursuant to lease agreements for real or personal property in force before February 15, 2020 (“business rent or lease payments”); and
- Covered utility payments: business payments for a service for the distribution of electricity, gas, water, telephone, transportation, or internet access for which service began before February 15, 2020 (“business utility payments”).
- Rent payments to a related party are eligible for loan forgiveness as long as: 1) The amount of the loan forgiveness requested for rent or lease payment to the related party is no more than the amount of mortgage interest owed to an unrelated, third party lender during the Covered Period AND 2) The lease and mortgage were in place prior to 2/15/20. The borrower must provide the PPP lender with mortgage interest documentation from the third party mortgage lender verifying the amount of interest payments on the building.

3508 Schedule A Worksheet for 3508 Filers

Once you have compiled the necessary documentation to begin completing the [Schedule A Worksheet](#), please complete the information needed for Table 1 and Table 2 (lines 1 – 5). **This worksheet will not be uploaded to the Portal, and your completed worksheet should not be uploaded as a document, but rather utilized as a working paper and maintained for your records.**

- **Lines 1 and 4:** previously detailed on Page 7
- **Average FTE: Lines 2 and 5 of Schedule A:** This calculates the average full-time equivalency (FTE) during the Covered Period or the Alternative Payroll Covered Period. For each employee, you will enter the average number of hours paid per week, divide by 40, and round the total to the nearest tenth. The maximum for each employee is capped at 1.0. A simplified method that assigns a 1.0 for employees who work 40 hours or more per week and 0.5 for employees who work fewer hours may be used at the election of the Borrower
- **Total Salary/Hourly Wage Reduction (Line 3 Schedule A):** This calculation will be used to determine whether the Borrower’s loan forgiveness amount must be reduced due to a statutory requirement concerning reductions in employee salary and wages. Borrowers are eligible for loan forgiveness for certain expenditures during the Covered Period or the Alternative Payroll Covered Period. However,

the actual amount of loan forgiveness the Borrower will receive may be less, depending on whether the salary or hourly wages of certain employees during the Covered Period or the Alternative Payroll Covered Period was less than during the period from January 1, 2020 to March 31, 2020. If the Borrower restored salary/hourly wage levels, the Borrower may be eligible for elimination of the Salary/Hourly Wage Reduction amount. Borrowers must complete this worksheet to determine whether to reduce the amount of loan forgiveness for which they are eligible. Complete the Salary/Hourly Wage Reduction column only for employees whose salaries or hourly wages were reduced by more than 25% during the Covered Period or the Alternative Payroll Covered Period as compared to the period of January 1, 2020 through March 31, 2020.

- **Lines 6 through 9:** previously detailed on pages 7, 8, and 9.
- **FTE Reduction Calculation / Safe Harbors** allows you to go straight to Line 13 if any one of the three criteria is met:
 - No reduction in employees or average paid hours between January 1, 2020 and the end of the covered period
 - FTE Reduction Safe Harbor 1- See Below
 - FTE Reduction Safe Harbor 2- See Below

FTE Reduction Safe Harbors: Two separate safe harbors exempt certain borrowers from any loan forgiveness reduction based on a reduction in FTE employee levels.

1. The Borrower is exempt from the reduction in loan forgiveness based on a reduction in FTE employees described above if the Borrower, in good faith, is able to document that it 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 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 for sanitation, social distancing, or any other worker or customer safety requirement related to COVID-19.
2. The Borrower is exempt from the reduction in loan forgiveness based on a reduction in FTE employees described above if both of the following conditions are met: (a) the Borrower reduced its FTE employee levels in the period beginning February 15, 2020, and ending April 26, 2020; and (b) the Borrower then restored its FTE employee levels by not later than December 31, 2020 to its FTE employee levels in the Borrower's pay period that included February 15, 2020

FTE Reference Period – if any one of the above mentioned criteria is not met: (Line 11 of Schedule A)

Documentation showing (at the election of Borrower):

- The average number of FTE employees on payroll per week employed by the Borrower between February 15, 2019 and June 30, 2019;
- The average number of FTE employees on payroll per week employed by the Borrower between January 1, 2020 and February 29, 2020; or
- In the case of a seasonal employer, the average number of FTE employees on payroll per week employed by the Borrower between February 15, 2019 and June 30, 2019; between January 1, 2020 and February 29, 2020; or any consecutive 12-week period between May 1, 2019 and September 15, 2019. These borrowers who elected to use a 12-week period between May 1, 2019 and September 15, 2019 for the PPP loan application, must use the same 12-week period as the reference period for calculation of any reduction in the amount of loan forgiveness.

The selected time period must be the same time period as the reference period selected for purposes of completing PPP Schedule A, line 11. Documents may include payroll tax filings reported, or that will be reported, to the IRS (typically, Form 941) and state quarterly business and individual employee wage reporting and unemployment insurance tax filings reported, or that will be reported, to the relevant state. Documents submitted may cover periods longer than the specific time period.

Final Stages of the Forgiveness Portal Process

Submitting and Signing Forgiveness Application

Separate directions in Portal User Guide will walk you through this process in either situation whether the inputs were completed by the Authorized Signer or a Delegate was assigned.

Certify, Authorize and Sign

The Authorized Signer is required to now electronically certify, authorize and sign the PPP Forgiveness Application via DocuSign. The Authorized Signer will need to review the Forgiveness Application to ensure the Forgiveness amount matches expectations. Finally, read through the Certifications carefully before initialing and signing, as these are your certifications to the SBA.

Record Keeping

All records relating to the Borrower's PPP loan, including documentation submitted with its PPP loan application, 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, and documentation demonstrating the Borrower's material compliance with PPP requirements. The Borrower must retain all such documentation in its 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.

Documents Required to be Submitted

These documents will be used to verify the eligible cash compensation and non-cash benefit payments from the Covered Period or the Alternative Payroll Covered Period. Please provide each of the following:

- a. Bank account statements or third-party payroll service provider reports.
- b. Tax forms or equivalent third-party payroll service provider reports for the periods that overlap with the Covered Period or the Alternative Payroll Covered Period:
 - i. Payroll tax filings reported, or that will be reported, to the IRS (typically, Form 941); and
 - ii. State quarterly business and individual employee wage reporting and unemployment insurance tax filings reported, or that will be reported, to the relevant state.
- c. Payment receipts, cancelled checks, or account statements documenting the amount of any employer contributions to employee health insurance and retirement plans that the Borrower included in the forgiveness amount.
- d. **3508EZ Applicants:** If you only met criteria number 2 of the 3508EZ eligibility requirements, please provide documentation 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.
- e. **3508 Applicants:** If there is more than one individual included in Line 9, Compensation to Owners, separate documentation that lists the names and compensation to each individual owner.
- f. **3508 Applicants:** If Safe Harbor is not met, provide supporting FTE Documentation showing (one of the three below periods below at the election of the Borrower):
 1. the average number of FTE employees on payroll per week employed by the Borrower between February 15, 2019 and June 30, 2019;
 2. the average number of FTE employees on payroll per week employed by the Borrower between January 1, 2020 and February 29, 2020; or
 3. in the case of a seasonal employer, the average number of FTE employees on payroll per week employed by the Borrower between February 15, 2019 and June 30, 2019; between January 1, 2020 and February 29, 2020; or any consecutive 12-week period between May 1, 2019 and September 15, 2019.

The selected time period from the above choices must be the same reference period selected for purposes of completing PPP Schedule A, line 11. Documents may include payroll tax filings reported, or that will be reported, to the IRS (typically, Form 941/943) and state quarterly business and individual employee wage reporting and unemployment insurance tax filings reported, or that will be reported, to the relevant state. Documents submitted may cover periods longer than the specific time period.

These documents will be used to **verify existence of the non-payroll obligations/services prior to February 15, 2020 and eligible payments from the Covered Period**. Please provide the following as applicable:

- a. Business mortgage interest payments: Copy of lender amortization schedule and receipts or cancelled checks verifying eligible payments from the Covered Period; or lender account statements from February 2020 and the months of the Covered Period through one month after the end of the Covered Period verifying interest amounts and eligible payments paid or incurred.
- b. Business rent or lease payments: Copy of current lease agreement and receipts or cancelled checks verifying eligible payments from the Covered Period; or lessor account statements from February 2020 and from the Covered Period through one month after the end of the Covered Period verifying eligible payments paid or incurred.
- c. Business utility payments: Copy of invoices from February 2020 and those paid during the Covered Period and receipts, cancelled checks, or account statements verifying those eligible payments paid or incurred.

Documents That You Must Maintain (for 6 years) but Not Submit

- **3508EZ Criteria 2 and 3—Salary/Hourly Wage Reduction:** Documentation supporting the certification that annual salaries or hourly wages were not reduced by more than 25 percent during the Covered Period or the Alternative Payroll 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 or Alternative Payroll Covered Period.
- **FTE Reduction Exceptions:** 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. Line c of 3508 maintain
- **3508EZ Criteria 2—3508 No reduction in employees or average paid hours:** 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 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.
- **3508EZ Criteria 3 - 3508 FTE Reduction Safe Harbor 1:** Documentation supporting the 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 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. Line d of 3508 maintain

- **3508 FTE Reduction—Safe Harbor 2:** Documentation supporting the PPP Schedule A Worksheet “FTE Reduction Safe Harbor 2.” The Borrower is exempt from the reduction in loan forgiveness based on a reduction in FTE employees described above if both of the following conditions are met: (a) the Borrower reduced its FTE employee levels in the period beginning February 15, 2020, and ending April 26, 2020; and (b) the Borrower then restored its FTE employee levels by not later than December 31, 2020 to its FTE employee levels in the Borrower’s pay period that included February 15, 2020.
- **Documentation supporting the listing of each individual employee in PPP Schedule A Worksheet**

Table 1, including the “Salary/Hourly Wage Reduction” calculation, if necessary.

- **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.

Conclusion

Thank you again for choosing Washington Trust Bank. Please reach out to your Relationship Manager with questions as you work through the Forgiveness Process.