

Webinar-September 25, 2020

#### **WEBINAR LOGISTICS**

- All Participants are muted. If you are experience audio issues when calling in please try using you computer speakers.
- We would love to hear from you! Questions bar.
- A recording of the webinar and presentation slides will be available this afternoon.
- Rapidly changing environment What we know now.

Webinar-September 25, 2020

#### COVID-19 WEBINAR 14

EEOC | FFCRA | PAYROLL TAX DEFERRAL SBA/TREASURY ON PPP UPDATE

9.25.20







MICHAEL MURPHY



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Webinar September 25, 2020

#### **AGENDA**

- New guidance from the EEOC related to COVID-19.
- New regulations related to the FFCRA paid leaves.
- Practicalities of the employee payroll tax deferral executive order.
- PPP Forgiveness.
  - New FAQ's issued on 08-11-20 and an update from 08-24-20.
  - Forgiveness Application Considerations.

# COVID-19 Employment Law Update

Platinum Group September 25, 2020

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- State of New York sued the U.S. Department of Labor challenging four (4) parts of the FFCRA regulations:
  - The requirement that an employee is only entitled to paid sick leave or expanded FMLA leave if the employer has work for the employee;
  - The requirement that an employee may only take intermittent leave under the expanded FFCRA with the employer's approval;
  - The definition of a "health care provider" for purposes of exemption from the FFCRA;
  - The requirement that employees who take FFCRA leave must provide certain documentation <u>before</u> taking the leave.
- New regulations were issued on September 11, 2020
- Effective date: September 16, 2020



- Reaffirms that an employee is <u>not</u> entitled to emergency paid sick leave if the employer does not have work for the employee
  - Even if the employee meets a qualifying reason, such as being advised to self-quarantine by a medical provider
- Reaffirms that intermittent leave to care for a child whose school, place of care, or childcare provider is closed due to COVID-19 is available only with the employer's consent
  - Similar to intermittent leave under traditional FMLA for the birth or placement of a child



- Narrows the definition of a "health care provider" exempt from FFCRA requirements to only include:
  - Doctor of medicine or osteopathy; podiatrists; dentists; clinical psychologists; optometrists; certain chiropractors; nurse practitioners; nurse mid-wives; clinical social workers; and physician assistants
  - OAny employee who is "capable of providing health care services, meaning he/she is employed to provide diagnostic services, preventive services, treatment services, or other services that are integrated with and necessary to the provision of patient care and, if not provided, would adversely impact patient care"
    - So what does this mean?



- Employees who are "capable or providing healthcare services" only include:
  - Nurses, nurse assistants, medical technicians, and any other persons who directly provide healthcare services
  - Employees who provide healthcare services under the supervision, order, or direction of, or provide direct assistance to a doctor or the persons listed in the first bullet point in the prior slide or prior bullet point
  - Employees who are otherwise integrated into and necessary to the provision of health care services, such as laboratory technicians who process test results necessary for diagnosis and treatment

- Does not include individuals who do not provide health care services, even if their services could affect the provision of health care services
  - IT professionals, building maintenance staff, human resources personnel, cooks, food service workers, records managers, consultants, billers
- •May be employees who work at a doctor's office, hospital, health care center, clinic, medical school, local health department, nursing facility, retirement facility, nursing home, home health care provider, any facility that performs laboratory or medical testing, pharmacy, or similar
  - Do not have to work at one of these to be a health care provider
  - Working at one of these does not necessarily mean employee is a health care provider
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- Cannot require that employee provide advanced notice of need for emergency paid sick leave
  - Can only be required after the first workday (or portion of workday) for which the employee takes the leave
  - After the first workday, it will be "reasonable" for the employer to require notice as "soon as practicable under the facts and circumstances of the particular case"
  - Employee spokesperson (spouse, family member, etc.) may provide notice if employee is unable
- Notice for expanded family medical leave is required as soon as practicable
  - If the need is foreseeable, it will be practicable to provide notice prior to taking the leave
- Furnish documentation of the need for leave as soon as practicable (may be when the notice is provided)

- Employers can ask all employees who physically enter the workplace if:
  - Have symptoms of COVID-19
  - Have COVID-19
  - Have been tested for COVID-19
- Not permitted to ask these questions for employees who are teleworking and not physically interacting with coworkers or others

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LAW FIRM

- Be careful about targeting one employee
  - olf only asking COVID-19 questions, temperature-checking, or requiring testing of one employee (as opposed to all)—must have a reasonable belief, based on objective evidence, that the employee might have COVID-19
- Cannot ask employees entering the workplace whether family members have COVID-19 or symptoms
  - Can ask if employee has had contact with anyone diagnosed with COVID-19 or who has had symptoms
  - Practically family-only inquiry is too limited anyway



- Can bar employee from entering the workplace if he refuses to have temperature taken or refuses to answer COVID-19 questions
  - May ask why the employee is refusing
  - Consider reasonable accommodation issues
- Can ask why an employee was absent from work
- Can ask where an employee has traveled
- COVID-19 may result in excusable delays during the interactive process



- Manager who learns employee has COVID-19 but is worried about violating employee confidentiality by reporting it
  - Must keep all medical information confidential
  - But can report to "appropriate employer officials" so action can be taken consistent with CDC and public health guidance
  - Must make every effort to limit the number of people who learn the employee's name
  - Employer can interview employee to get a list of people with whom the employee has possibly had contact
  - Can notify those with whom employee has had contact <u>without</u> revealing employee's identity
    - Example: "someone at this location" or "someone on fourth floor"
  - Even if employees figure out: cannot confirm or reveal employee's identity
  - Instruct employees who do learn that identity that must be kept confidential



- Employee who learns that a coworker in same location has COVID-19 symptoms may report it to their supervisor
- If an employee is teleworking because advised to selfquarantine: may inform others that employee is teleworking, but cannot state why
- Supervisors who learn medical information while working remotely should be reminded that must be kept confidential
  - Consider using initials or codes to further protect confidentiality



- •If permit individuals to telework due to COVID-19:
  - Do not have to automatically grant telework as a reasonable accommodation to every employee with a disability who requests it
  - Does not mean that permanently changed a position's essential functions
  - Does not mean that teleworking is always a feasible accommodation
  - Does not mean that teleworking does not pose an undue hardship
  - Do need to go through the interactive process



- •What if denied requested accommodation to telework pre-COVID due to concerns that employee would not be able to perform essential functions remotely, and employee requests it again after COVID?
  - Temporary telework during COVID-19 may be relevant in considering renewed request
  - COVID-19 telework could be a "trial period" that could show whether or not employee could perform essential functions
  - Engage in interactive process



## Payroll Tax Deferral

- President Trump issued Presidential Memorandum on August 8 to defer withholding, deposit, and payment of employee Social Security taxes from employee's compensation
  - Typically must withhold 6.2% of employee's compensation, up to \$137,700 (2020 limit)
  - Employer also contribute equal amount of Social Security taxes
- Postponed withholding employee portion until first quarter of 2021
- ■Applies to wages paid from September 1 December 31, 2020
  - Only if amount of wages paid for a bi-weekly pay period is less than \$4,000
- •Must withhold deferred taxes ratably from wages paid between January 1
- April 30, 2021, or interest and penalties will apply



## Payroll Tax Deferral

- •Initial IRS guidance did not state whether it is optional—but IRS attorney later stated during a teleconference that it is optional
  - Employer controls whether or not to implement the deferral
- Practical considerations:
  - Employee will face double-withholding in first quarter of 2021
  - What happens if employee leaves before repaid?
  - No indication yet that Congress will implement forgiveness



## Questions?

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#### **PAYCHECK PROTECTION PROGRAM**

#### **SBA Update on 08-24-20:**

#### • The Less Than 5% "Exclusion" for Owner-Employees

The SBA created an exception to caps and limitations for "owner-employees" that hold less than a 5% stake. For these "owner-employees," forgiveness of their compensation will be calculated under the same rules for other employees and not capped and limited.

#### Impact of Tenants or Subtenants

- SBA stated that amounts attributable to a tenant or subtenant may NOT be included. For example, if a PPP borrower had a monthly rental obligation of \$10,000 and sublet a portion of space to a third party for \$2,500 per month, only \$7,500 could be counted toward forgiveness.
- If a PPP borrower was subject to monthly mortgage interest expense of \$1,000, but subleased space to a third party which space would be considered as 25% of the fair market value of the total space involved, only \$750 of interest expense would be eligible for forgiveness.
- Lastly, where forgiveness is sought for utility expenses, if there is a tenant or subtenant paying rent covering a portion of total utility expenses for the property, that amount would need to be netted against total utility amounts claimed for forgiveness.

#### **PAYCHECK PROTECTION PROGRAM**

#### SBA Update on 08-24-20 (continued):

#### Special Rules for Expenses Paid to "Related Parties"

Rent paid to a "related party" rule is eligible for forgiveness "as long as the amount of the forgiveness requested ... is no more than the amount of the mortgage interest owed on the property for the covered period attributable to the space rented."

But, mortgage interest payments to a "related party" are NOT eligible for forgiveness. These payments for some reason are considered as payments back to a "business owner" and not eligible as a true overhead expense.

#### **PAYCHECK PROTECTION PROGRAM**

#### SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

**1. Question:** Are payroll costs that were incurred during the Covered Period or the Alternative Payroll Covered Period but paid after the Covered Period or the Alternative Payroll Covered Period eligible for loan forgiveness?

**Answer:** Yes, if the payroll costs are paid on or before the next regular payroll date after the Covered Period or Alternative Payroll Covered Period.

**2. Question:** Are payroll costs that were incurred before the Covered Period but paid during the Covered Period eligible for loan forgiveness?

**Answer:** Yes.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

**3. Question:** Are borrowers required to calculate payroll costs for partial pay periods?

**Answer:** If the borrower uses a biweekly or more frequent (e.g., weekly) payroll cycle, the borrower may elect to calculate eligible payroll costs using the eight-week (for borrowers that received their loans before June 5, 2020 and elect this Covered Period length) or 24-week period that begins on the first day of the first payroll cycle following the PPP Loan Disbursement Date (referred to as the Alternative Payroll Covered Period). However, if a borrower pays twice a month or less frequently, it will need to calculate payroll costs for partial pay periods. The Covered Period or Alternative Covered Period for any borrower will end no later than December 31, 2020.

**4. Question:** For purposes of calculating cash compensation, should borrowers use the gross amount before deductions for taxes, employee benefits payments, and similar payments, or the net amount paid to employees?

Answer: The gross amount should be used when calculating cash compensation.

#### **PAYCHECK PROTECTION PROGRAM**

#### SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

**5. Question:** Are only salaries or wages covered by loan forgiveness, or can a borrower pay lost tips, lost commissions, bonuses, or other forms of incentive pay and have such costs qualify for loan forgiveness?

**Answer:** Payroll costs include all forms of cash compensation paid to employees, including tips, commissions, bonuses, and hazard pay. Note that forgivable cash compensation per employee is limited to \$100,000 on an annualized basis.

**6. Question:** What expenses for group health care benefits will be considered payroll costs that are eligible for loan forgiveness?

**Answer:** Employer expenses for employee group health care benefits that are paid or incurred by the borrower during the CP or the APCP are payroll costs eligible for loan forgiveness. However, payroll costs do not include expenses for group health care benefits paid by employees (or beneficiaries of the plan) either pre-tax or after tax, such as the employee share of their health care premium. Forgiveness is not provided for expenses for group health benefits accelerated from periods outside the CP or APCP. (See FAQ 8 for rules that apply to owner health insurance)

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

**7. Question:** What contributions for retirement benefits will be considered payroll costs that are eligible for loan forgiveness?

**Answer:** Generally, employer contributions for employee retirement benefits that are paid or incurred by the borrower during the CP or APCP qualify as "payroll costs" eligible for loan forgiveness. The employer contributions for retirement benefits included in the loan forgiveness amount as payroll costs <u>cannot include</u> any retirement contributions deducted from employees' pay or otherwise paid by employees. Forgiveness is not provided for employer contributions for retirement benefits accelerated from periods outside the CP or APCP. Loan Forgiveness Payroll Costs FAQ 8 outlines the treatment of retirement benefits for owners.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

**8. Question:** How is the amount of owner compensation that is eligible for loan forgiveness determined?

**Answer:** The amount of compensation of owners who work at their business that is eligible for forgiveness depends on the business type and whether the borrower is using an eight-week or 24-week Covered Period. In addition to the specific caps described below, the amount of loan forgiveness requested for owner-employees and self-employed individuals' payroll compensation is capped at \$20,833 per individual in total across all businesses in which he or she has an ownership stake. For borrowers that received a PPP loan before June 5, 2020 and elect to use an eight-week Covered Period, this cap is \$15,385. If their total compensation across businesses that receive a PPP loan exceeds the cap, owners can choose how to allocate the capped amount across different businesses.

The examples below are for a borrower using a 24-week Covered Period.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

8. <u>C Corporations:</u> The employee cash compensation of a C-corporation owner-employee, defined as an owner who is also an employee (including where the owner is the only employee), is eligible for loan forgiveness up to the amount of 2.5/12 of his or her 2019 employee cash compensation, with <u>cash compensation defined as it is for all other employees</u>. Borrowers are also eligible for loan forgiveness for payments for employer state and local taxes paid by the borrowers and assessed on their compensation, for the amount paid by the borrower for employer contributions for their employee health insurance, and for employer retirement contributions to their employee retirement plans capped at the amount of 2.5/12 of the 2019 employer retirement contribution. Payments other than for cash compensation should be included on lines 6-8 of PPP Schedule A of the loan forgiveness application (SBA Form 3508 or lender equivalent), for borrowers using that form, and do not count toward the \$20,833 cap per individual.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

**S Corporations:** The employee cash compensation of an S-corporation owner-employee, defined as an owner who is also an employee, is eligible for loan forgiveness up to the amount of 2.5/12 of their 2019 employee cash compensation, with cash compensation defined as it is for all other employees. Borrowers are also eligible for loan forgiveness for payments for employer state and local taxes paid by the borrowers and assessed on their compensation, and for employer retirement contributions to their employee retirement plans capped at the amount of 2.5/12 of their 2019 employer retirement contribution. Employer contributions for health insurance are not eligible for additional forgiveness for S-corporation employees with at least a 2% stake in the business, including for employees who are family members of an at least 2% owner under the family attribution rules of 26 U.S.C. 318, because those contributions are included in cash compensation. The eligible non-cash compensation payments should be included on lines 7 and 8 of PPP Schedule A of the Loan Forgiveness Application (SBA Form 3508), for borrowers using that form, and do not count toward the \$20,833 cap per individual.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

8. Self Employed Schedule C (or schedule F) filers: The compensation of self-employed Schedule C (or Schedule F) individuals, including sole proprietors, self-employed individuals, and independent contractors, that is eligible for loan forgiveness is limited to 2.5/12 of 2019 net profit as reported on IRS Form 1040 Schedule C line 31 (or 2.5/12 of 2019 net farm profit, as reported on IRS Form 1040 Schedule F line 34) (or for new businesses, the estimated 2020 Schedule C (or Schedule F) referenced in question 10 of "Paycheck Protection Program: How to Calculate Maximum Loan Amounts – By Business Type"). Separate payments for health insurance, retirement, or state or local taxes are not eligible for additional loan forgiveness; health insurance and retirement expenses are paid out of their net self-employment income. If the borrower did not submit its 2019 IRS Form 1040 Schedule C (or F) to the Lender when the borrower initially applied for the loan, it must be included with the borrower's forgiveness application.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Payroll Costs FAQ's Update on 08-11-20:

8. General Partners: The compensation of general partners that is eligible for loan forgiveness is limited to 2.5/12 of their 2019 net earnings from self-employment that is subject to self-employment tax, which is computed from 2019 IRS Form 1065 Schedule K-1 box 14a (reduced by box 12 section 179 expense deduction, unreimbursed partnership expenses deducted on their IRS Form 1040 Schedule SE, and depletion claimed on oil and gas properties) multiplied by 0.9235. Compensation is only eligible for loan forgiveness if the payments to partners are made during the Covered Period or Alternative Payroll Covered Period. Separate payments for health insurance, retirement, or state or local taxes are not eligible for additional loan forgiveness. If the partnership did not submit its 2019 IRS Form 1065 K-1s when initially applying for the loan, it must be included with the partnership's forgiveness application.

**LLC owners:** LLC owners must follow the instructions that apply to how their business was organized for tax filing purposes for tax year 2019, or if a new business, the expected tax filing situation for 2020.

#### **PAYCHECK PROTECTION PROGRAM**

#### SBA Loan Forgiveness Non-Payroll Costs FAQ's Update on 08-11-20:

**1. Question:** Are nonpayroll costs incurred prior to the Covered Period, but paid during the Covered Period, eligible for loan forgiveness?

**Answer:** Yes, eligible business mortgage interest costs, eligible business rent or lease costs, and eligible business utility costs incurred prior to the Covered Period and paid during the Covered Period are eligible for loan forgiveness.

**2. Question:** Are nonpayroll costs incurred during the Covered Period, but paid after the Covered Period, eligible for loan forgiveness?

**Answer:** Nonpayroll costs are eligible for loan forgiveness if they were 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.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Non-Payroll Costs FAQ's Update on 08-11-20:

**3. Question:** If a borrower elects to use the Alternative Payroll Covered Period for payroll costs, does the Alternative Payroll Covered Period apply to nonpayroll costs?

<u>Answer:</u> No. The Alternative Payroll Covered Period applies only to payroll costs, not to nonpayroll costs. The Covered Period always starts on the date the lender makes a disbursement of the PPP loan. Nonpayroll costs must be paid or incurred during the Covered Period to be eligible for loan forgiveness.

**4. Question:** Is interest on unsecured credit eligible for loan forgiveness?

**Answer:** No. Payments of interest on business mortgages on real or personal property (such as an auto loan) are eligible for loan forgiveness. Interest on unsecured credit is not eligible for loan forgiveness because the loan is not secured by real or personal property. Although interest on unsecured credit incurred before February 15, 2020 is a permissible use of PPP loan proceeds, this expense is not eligible for forgiveness.

#### **PAYCHECK PROTECTION PROGRAM**

#### SBA Loan Forgiveness Non-Payroll Costs FAQ's Update on 08-11-20:

**5. Question:** Are payments made on recently renewed leases or interest payments on refinanced mortgage loans eligible for loan forgiveness if the original lease or mortgage existed prior to February 15, 2020?

**Answer:** Yes. If a lease that existed prior to February 15, 2020 expires on or after February 15, 2020 and is renewed, the lease payments made pursuant to the renewed lease during the Covered Period are eligible for loan forgiveness. Similarly, if a mortgage loan on real or personal property that existed prior to February 15, 2020 is refinanced on or after February 15, 2020, the interest payments on the refinanced mortgage loan during the Covered Period are eligible for loan forgiveness.

**6. Question:** Covered utility payments, which are eligible for forgiveness, include a "payment for a service for the distribution of . . . transportation" under the CARES Act. What expenses does this category include?

**Answer:** A service for the distribution of transportation refers to transportation utility fees assessed by state and local governments. Payment of these fees by the borrower is eligible for loan forgiveness.

#### **PAYCHECK PROTECTION PROGRAM**

SBA Loan Forgiveness Non-Payroll Costs FAQ's Update on 08-11-20:

7. **Question:** Are electricity supply charges eligible for loan forgiveness if they are charged separately from electricity distribution charges?

<u>Answer:</u> Yes. If a lease that existed prior to February 15, 2020 expires on or after February 15, 2020 and is renewed, the lease payments made pursuant to the renewed lease during the Covered Period are eligible for loan forgiveness. Similarly, if a mortgage loan on real or personal property that existed prior to February 15, 2020 is refinanced on or after February 15, 2020, the interest payments on the refinanced mortgage loan during the Covered Period are eligible for loan forgiveness.

#### **PAYCHECK PROTECTION PROGRAM**

#### SBA Loan Forgiveness Reductions FAQ's Update on 08-11-20:

- See <a href="https://home.treasury.gov/system/files/136/PPP--Loan-Forgiveness-FAQs.pdf">https://home.treasury.gov/system/files/136/PPP--Loan-Forgiveness-FAQs.pdf</a> Page 8 for Five Questions and Examples of Loan Forgiveness Reductions.
- FTE Reductions.
- Salary Reductions (25%).
- Seasonal Employers.

#### **PAYCHECK PROTECTION PROGRAM**

#### **SBA Loan Forgiveness Application Considerations:**

- Form 3508 EZ or Form 3508 (see next two slides)?
- Lender reviews documentation initially then submits to SBA.
- Documentation requirements for forgiveness. Banks seem to differ on what they are requesting. If
  more documentation is requested by the bank, additional 60 days allowed.
- Some Banks still not accepting applications.
- Possible \$150,000 blanket forgiveness unlikely. September 1 Congressional report.
- Some discussion about updating forgiveness applications.
- Still awaiting final regulations.

#### **PAYCHECK PROTECTION PROGRAM**

#### **SBA Loan Forgiveness Application Considerations:**

- ☐ 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. (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.

#### **PAYCHECK PROTECTION PROGRAM**

#### **SBA Loan Forgiveness Application Considerations:**

□ 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.

#### **PAYCHECK PROTECTION PROGRAM**

#### **Forgiveness Links:**

- <u>Loan-Forgiveness-Application-Form-EZ-Instructions</u>
- PPP-Forgiveness-Application-3508EZ
- PPP-Loan-Forgiveness-Application-Instructions-Form 3508
- SBA-Form-3508-PPP-Forgiveness-Application
- SBA FAQ's issued 08-11-20

CARES ACT REVIEW

## Questions?

Webinar-September 25, 2020

#### COVID-19 WEBINAR 14

EEOC | FFCRA | PAYROLL TAX DEFERRAL SBA/TREASURY ON PPP UPDATE

9.25.20







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## Thank you!

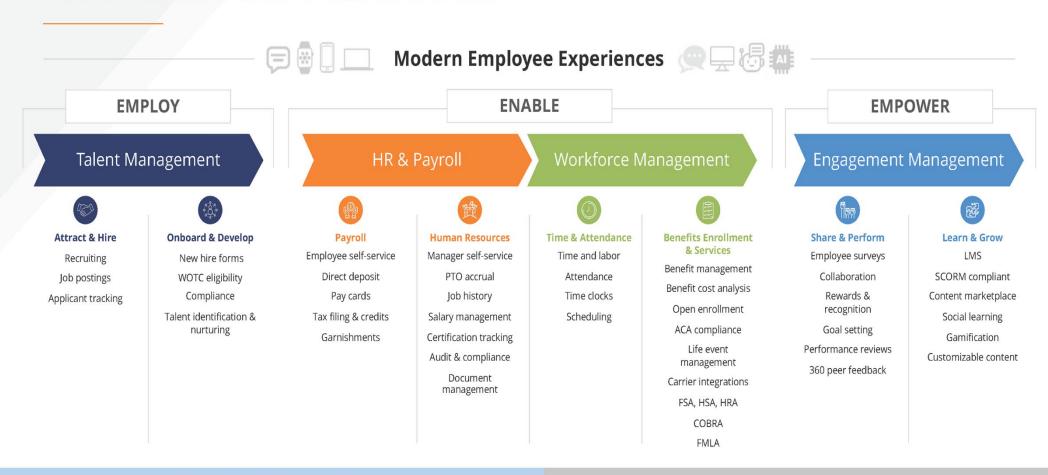
Future Webinars will be scheduled based on new guidance Invitations will be sent

Recordings and presentation slides will be sent out this afternoon.

This presentation is based on information available on September 24th, 2020 and is subject to change.

Employee Experience: Employ, Enable, Empower

## The iSolved Platform



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