



U.S. Small Business
Administration

Paycheck Protection Program Lender Instructions for the Loan Necessity Questionnaire

November 25, 2020

Background on Loan Necessity Questionnaire

- As previously announced, SBA will review all PPP loans to Borrowers that, together with their affiliates, received loans of \$2 million or greater, for loan necessity.
- Each of these Borrowers must complete a Loan Necessity Questionnaire and submit it, along with the required supporting documents, to the Lender servicing the Borrower's PPP loan.
 - For-Profit Borrowers will be required to complete the For-Profit Questionnaire (**SBA Form 3509**).
 - Non-Profit Borrowers will be required to complete the Non-Profit Questionnaire (**SBA Form 3510**).
- Information provided in the Loan Necessity Questionnaire will inform SBA's review of those Borrowers' good-faith certification, as required by the CARES Act, that "[c]urrent economic uncertainty makes this loan request necessary to support the ongoing operations" of the Borrower. A request to complete the Questionnaire does not mean that SBA is challenging that certification.
- After the Questionnaire is submitted, SBA may request additional information, if necessary, to complete its review. SBA's determination will be based on the totality of the Borrower's circumstances.

How Lenders Receive Notice of a Questionnaire

- Lenders will receive notification of a loan review via the Forgiveness Platform Inbox. The notification will state whether a Borrower is required to fill out a Loan Necessity Questionnaire.
- Lenders should download the appropriate Questionnaire (for-profit or non-profit) from the Platform Resources page and send it to the Borrower within 5 days after receiving the notification.

The screenshot shows the SBA Forgiveness Platform interface. The top left corner features the SBA logo and the text "U.S. Small Business Administration". In the top right corner, there are user icons and a "Sign Out" button. A vertical navigation menu on the left side includes "Resources" (highlighted with a red box), "Inbox", "SBA Dashboard", "Payment Dashboard", "Lookup Disbursed PPP Loans", "Submit New PPP Forgiveness Decision", and "All Forgiveness Submissions". The main content area is titled "Resource Center" and contains a welcome message: "Welcome to the SBA Forgiveness Platform. This platform will allow the submission of lender decisions to the SBA. Please take the time to read the user guide, watch our introductory video, and read the FAQs and additional resources. We appreciate your continued efforts to support the small business community during these unprecedented times. Please let us know how we can continue to improve this platform and our services." Below this message, a section titled "Forgiveness submissions are now being accepted." lists three steps: 1. Enter your institution settings to ensure timely payment. 2. View our videos before you begin. 3. Please utilize the Inbox as your primary channel for all questions or concerns related to submissions. At the bottom of the main content area, there are links for "User Guide", "Videos", "FAQ", and "Additional Resources" (highlighted with a red box). On the right side, there are two document icons with links: "3509 Loan Necessity Questionnaire (For Profit)" and "3510 Loan Necessity Questionnaire (Non-Profit)".

Borrowers are NOT able to access the Questionnaire via the Forgiveness Platform. Access to the Platform is limited to Lenders only.

What Lenders Must Do After Receiving a Notice

- Lenders should respond to the Inbox Message by uploading the standard loan review documentation (e.g., borrower application, forgiveness application supporting documentation, transcript) requested in the loan review notification letter **within five business days** of receipt. (The Questionnaire and supporting documentation will be uploaded later.) Once the requested standard loan review documents are uploaded, mark this message completed and send back to SBA via the Forgiveness Platform.
- A Lender must notify the Borrower **within 5 business days** after the Lender receives notification from SBA.
 - The Lender must include the appropriate version of the Questionnaire (for-profit or non-profit) with its notice to the Borrower.
 - Lenders should advise Borrowers to return the completed Questionnaire to the Lender **within 10 business days** of receipt.

Notification letters regarding reviews of PPP loans other than reviews of loan necessity (e.g., all reviews of loans under \$2 million) will be sent through the Forgiveness Platform. Those notification letters explain the applicable SBA loan review and list the documents Borrowers or Lenders must provide to SBA via the Forgiveness Platform.

What Lenders Do with Borrower Responses

- After receipt of the complete Questionnaire and supporting documentation from the borrower, Lenders must upload the Borrower's completed Questionnaire and supporting documents to the Forgiveness Platform **within 5 business days of receipt** of the completed Questionnaire, including all required responses, supporting documents, signatures, and certifications. Lenders must also manually enter the Questionnaire responses on the Platform.
 - Lenders are not required to verify or validate any of the Borrower's responses or supporting documentation to the Questionnaire.
 - Lenders are not required to manually enter the narrative responses from the Questionnaire.
 - E-Signatures are allowed. "Wet" signatures are NOT required (see [FAQ #29](#)).

Lenders may email PPPForgivenessRequests@sba.gov with the subject line "Loan Necessity Questionnaire" for dedicated assistance regarding the Questionnaires.

How to Submit Loan Necessity Questionnaires

1. Navigate to the Loan Necessity Questionnaire screen. Lenders will be able to see all Loan Necessity Questionnaires for their institution.
2. To navigate to a draft or submitted Questionnaire, search for the SBA PPP Loan Number.
3. To input and submit a new Questionnaire, select “Create New Loan Necessity Questionnaire.”

The screenshot shows the SBA U.S. Small Business Administration interface for 'All Loan Necessity Questionnaires'. The sidebar on the left contains navigation options: Resources, Inbox, SBA Dashboard, Payment Dashboard, Lookup Disbursed PPP Loans, Submit New PPP Forgiveness Decision, All Forgiveness Submissions, Proactive Loan Reviews, Drafts, Institution Settings, and Loan Necessity Questionnaire. The main content area has a search bar and a 'Create New Loan Necessity Questionnaire' button. Below these is a table with columns: Lender Name, Borrower Name, SBA Number, Created, Updated, and Submitted. The table contains 7 rows of mock data. At the bottom of the table, it says 'Showing 1 to 7 of 7 entries' and has 'Previous' and 'Next' buttons.

Lender Name	Borrower Name	SBA Number	Created	Updated	Submitted
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	10/24/2020	10/24/2020	
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	10/24/2020	10/24/2020	
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	10/24/2020	10/24/2020	
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	10/25/2020	10/25/2020	
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	10/25/2020	10/25/2020	
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	10/27/2020	10/27/2020	
LENDER-SBA-UAT	MOCKDATAONLY	XXXXXXXXXXXX	11/05/2020	11/05/2020	

How to Submit Loan Necessity Questionnaires

4. Enter the SBA PPP Loan Number to identify it in the Forgiveness Platform.
5. Select the appropriate Questionnaire version (For-Profit or Non-Profit).

SBA U.S. Small Business Administration

Sign Out

Create a New Loan Necessity Questionnaire

Look Up Loan by SBA Number

XXXXXXXXXXXX

Search Cancel

This SBA PPP loan was found within the Forgiveness platform. Please create a questionnaire below to submit on behalf of your Borrower.

Entity Name	Loan Amount	SBA Number
MOCKDATAONLY	\$ 3,000,000.00	XXXXXXXXXXXX

Create New Loan Necessity Questionnaire:

For-Profit Non-Profit

How to Submit Loan Necessity Questionnaires

6. Confirm the loan details at the top of the Questionnaire to validate that the correct loan has been identified.
7. Input responses to each question directly from the Borrower's completed Questionnaire. Lenders are not required to verify or validate any of the Borrower's responses or supporting documents to these Questionnaires. However, Lenders should confirm that all required responses, supporting documents, and signatures and certifications have been received.

Loan Necessity Questionnaire

Loan Details

SBA #: XXXXXXXXXX
Lender PPP Loan #: XXXXXXXXXX
Borrower Name: MOCKDATAONLY
Borrower Type: 17
PPP Loan Disbursement Date: 04/30/2020
Original Principal Amount: \$ 3,000,000.00
Business TIN (EIN, SSN): *****XX

Business Activity Assessment

Question 1
Question 2
Question 3
Question 4
Question 5
Question 6
Question 7
Question 8 (Optional)

How to Submit Loan Necessity Questionnaires

8. Prior to submitting, Lenders should verify that they have uploaded a complete copy of the Borrower's Loan Necessity Questionnaire and all required supporting documentation. E-signatures are allowed. "Wet" signatures are NOT required. (see PPP FAQ #29, <https://www.sba.gov/sites/default/files/2020-10/Final%20PPP%20FAQs%20%28October%207%2C%202020%29-508.pdf>)

The screenshot shows a web interface for submitting a loan necessity questionnaire. At the top, the text "Upload Loan Necessity Questionnaire" is displayed on the left, and "Expand/Collapse All" is on the right. Below this is a progress bar with a red circle containing the number "8" and a red "x" icon followed by the text "Question 1". Underneath the progress bar is a blue button with a white checkmark and the text "Submit". The "Submit" button is highlighted with a red rectangular border.

Lenders should monitor the Forgiveness Platform Inbox for additional requests from SBA related to the loan review.