

Main Street Lending Program Comments

4/16/2020 1:08:00 PM	PIO (Email from	Coats	Kara	Kcoats@hopeandhealing.org	Children's Center for Hope and Healing	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:09:00 PM	PIO (Email from	Newton	Lynn	Personal Email Address	Interfaith Outreach Home	<p>I am writing in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:09:00 PM	PIO (Email from	Carney	Rex	rex_carney@elwyn.org	Elwyn	<p>Elwyn provides services to those with intellectual and developmental disabilities in PA, NJ and CA. We have 5000 employees and could not access the Paycheck Protection Program due to our size. We have approximately 1000 beds for fragile adults, and our system is under stress. We urge you to adapt the Main Street Loan program so it is accessible to providers like Elwyn as we continue our essential services. Specifically, we urge you to consider a .5 interest rate with a 5 year amortization, delayed payments for 2 years, a retention baseline pegged to date of loan approval, and defining a workforce as FTEs. Thank you.</p>
4/16/2020 1:10:00 PM	PIO (Email from	Rastikis	Julius	jule@mancopropertyservices.com	ManCo Property Services	<p>Is this loan program taking applications now?</p>
4/16/2020 1:11:00 PM	PIO (Email from	O'Neal	Angelia	aoneal@menwearinc.org	M.E.N.S. Wear, Inc. (Making Employment the Next Step)	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:14:00 PM	PIO (Email from	Carlson	Rejean	carlsonr@csgonline.org	Community Services Group	<p>Consider including loan forgiveness provisions similar to those included in the Paycheck Protection Program in this program. Unlike normal times when debt is used to fund positive ROI projects, these loans will most likely be used to fund deficits from simply continuing payroll and operations while experiencing significantly decreased revenue. As we emerge from this pandemic, many businesses will not have the increased profitability normally expected from investment or cash reserves to afford the increased debt payments from additional loans.</p>

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4/16/2020 1:15:00 PM	PIO (Email from	Peck	Michelle	Personal Email Address	Act3 Productions LLC	<p>By excluding nonprofits during this time, you are essentially closing our doors forever. It will be almost impossible for most of us to recover from this, and we have employees who deserve the assistance just as much as any other American.</p> <p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:16:00 PM	PIO (Email from	Fraser	Chris	chris.fraser@chesterton.com	A.W. Chesterton Inc.	<p>The term sheets for the Main Street New Loan and Expanded Loan Facility incorporate section 4003(c)(3)(A)(ii) of the CARES Act that imposes the following restriction: "until the date 12 months after the date on which the direct loan is no longer outstanding, not to pay dividends with respect to the common stock of the eligible business". Companies that have elected to be treated as S corporations make distributions to their owners who are obligated to pay taxes on income of the eligible business. We would like to confirm that S corporations will continue to be allowed to use the cash generated from their operations to make distributions to their owners to cover their tax obligations relating to that business.</p>
4/16/2020 1:16:00 PM	PIO (Email from	Feininger	Peter	Personal Email Address	Safe Harbor Center, Inc.	<p>Please consider including non-profits in the Main Street New and Expanded Loan Facilities program. Non-profits are critical to economic stability and well being of the less fortunate in every community. This economic recovery period maybe long and the viability of non-profits will be more important than ever in providing a safety net for those who need it most.</p> <p>Thank you for your consideration.</p>
4/16/2020 1:17:00 PM	PIO (Email from	Tabone	Collette	Director@motionpacific.com	Motion Pacific Dance	<p>Dear Main Street Staff,</p> <p>Please include nonprofits as part of this funding. Nonprofits provide essential services to our communities from providing food and resources to families in need to making arts accessible to all. Nonprofits should not be excluded from funding, especially now, as most operate on razor thin margins. Please reconsider this decision.</p> <p>Thank you.</p>
4/16/2020 1:18:00 PM	PIO (Email from	Pawlish	Steve	Personal Email Address		<p>We would like to urge you to please expand eligibility criteria for the Federal Reserve "Main Street" Lending Facility to include non-profits and higher education institutions. Like many businesses these entities are suffering losses from the current crisis and require additional resources to be able to cover those losses. Many of them are ineligible for the Paycheck Protection Program.</p> <p>These institutions employ more than 5 million dedicated professionals/workers and educate more than 19.9 million students across the United States. Many universities are a main employer in their communities, and some oversee major health systems that are responding to the pandemic. Their ineligibility to participate may mean some of these institutions may have to close.</p>
4/16/2020 1:20:00 PM	PIO (Email from	Edward	Donna	dedward@momentumh.org	Momentum for Health	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>

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4/16/2020 1:21:00 PM	PIO (Email from	Bruce	Sandra	Sandy@autismimprovised.org	Autism Improvised, Inc.	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:24:00 PM	PIO (Email from	Ho	Wendy	wendyh@svcn.org	Silicon Valley Council of Nonprofits	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act I am affiliated with a nonprofit organization in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. The enabling legislation (CARES Act, Section 4003) expressly included nonprofit organizations between 500 and 10,000 employees, but it now appears the Federal Reserve's initial guidance for the Main Street Lending Program excludes nonprofits for eligibility. These critical providers of the nation's safety net are not eligible for the Paycheck Protections Program (PPP) (Sections, 1102, 1106) or the Economic Injury Disaster Loans (EIDL) (Section 1110) or other federal relief. This proposed action threatens the viability of larger nonprofits who provide aid to hundreds of thousands of children and families. Please include nonprofits that employ over 500 employees in the Main Street Program to protect the critical safety net.</p>
4/16/2020 1:26:00 PM	PIO (Email from	stevens	greg	greg.stevens@kidzaniausa.com	KidZania USA	<p>We opened an educationally oriented themepark for elementary aged school children in Frisco TX in November, 2019. COVID-19 imposes a threat that we may not be able to re-open. MSLP won't work for us as we do not have a full year of operating history....strongly suggest that the EBITDA requirement is modified for companies with less than one year existence. Perhaps in these circumstances it is based on proforma EBITDA?</p>
4/16/2020 1:27:00 PM	PIO (Email from	Schlich	Bob	bob.schlich@incommunityga.org	InCommunity of Georgia	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:27:00 PM	PIO (Email from	La Bouff	Tara	tlabouff@ignatiushouse.org	Ignatius House Jesuit Retreat Center	<p>I write in opposition to the exclusion of nonprofits from the Main Street New &amp; Expanded Loan Facilities. The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Our particular mission includes overnight guest room and meeting space for nonprofit organizations, much like a hospitality business. We have been severely impacted by COVID-19 and will be closed for 90 days in support of prevention measures.</p> <p>Georgia's nonprofits supply critical services at a scale that would be impossible to replace; support an array of small businesses (print shops, web firms, food vendors, and more); and serve as economic anchors for their communities.</p> <p>I urge the Federal Reserve to make all nonprofits eligible for the Main Street Loan program. Donations from individuals (who no longer benefit from itemized charitable deductions or must take required minimum distributions in 2020) will not be sufficient for our recovery.</p>
4/16/2020 1:31:00 PM	PIO (Email from	Bakko	Matthew	mbakko@umich.edu	University of Michigan	<p>As part of the bipartisan CARES Act, the Federal Reserve recently announced its new "Main Street" lending facility. This facility will support up to \$600 billion in bank lending to small and mid-sized businesses, including two lending options: new loans of \$1 million to \$25 million, or expansion of a business's existing loan with a bank to up to \$150 million. Unfortunately, the Administration and the Fed, as of today, are excluding nonprofits, many institutions of higher learning and Minority-Serving Institutions. This is a significant blow in particular to entities that are also ineligible for the Paycheck Protection Program. Please include nonprofits in this facility, which are critical for sustaining our communities, especially at this time.</p>

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4/16/2020 1:32:00 PM	PIO (Email from	Penukonda	Aswin	cfo@talentlogic.com	Talent Logic Inc	Dear Sir/Madam, This is regarding Main Street New Loan facility under Section 13(3) of the FR Act. When can we start applying for this loan and through whom should we apply. An immediate response will be appreciated. Thank you. With Regards, Aswin
4/16/2020 1:33:00 PM	PIO (Email from	Edmisten	Teresa	Personal Email Address	Museum of Design Atlanta	As a Board Member for the Museum of Design Atlanta, I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities.  The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  The Museum of Design Atlanta (MODA) has been working tirelessly to bring needed enrichment activities to children and relief to their parents by providing valuable learning from trusted providers. That work continues even though MODA is strapped for cash. On premises revenue has been eliminated, donors have lost jobs and contributors, who are concerned about their business's future, are holding funds. We need help and OUR COMMUNITY NEEDS US, today and tomorrow. As large employers alone, non-profits like MODA deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  With local community leadership, nonprofits have held the country together through these days of hardship and unity. Please make it possible for our communities to emerge from this crisis whole by including nonprofits in the Main Street Loan program.
4/16/2020 1:35:00 PM	PIO (Email from	Blue	Jackalie	Personal Email Address	Karna, LLC	I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. This sector cannot be ignored if we are to recover our economy.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. That's over 150,000 people who will be left out of the recovery.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 1:35:00 PM	PIO (Email from	Grimaldi	Carol	carol.grimaldi@cornerstonesofcare.org	Cornerstones of Care	Cornerstones of Care is a community-based nonprofit human services organization whose 760 employees provided trauma-informed behavioral healthcare to 13,357 children and families in 2019. Because of COVID-19 we will lose over \$1.4 million through May, not including costs for needed Personal Protective Equipment.  As a nonprofit of more than 500 employees, we have been locked out of existing stimulus relief, including the Paycheck Protection Program; its loan forgiveness provisions can ensure we provide services during the crisis and assist in its recovery.  As the Treasury Department creates a program as directed under the CARES Act section 4003(c)(3)(D) to provide financing to lenders for nonprofits and other mid-size business between 500-10,000 employees, we request it: include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization; prioritize 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; defer payments for two years after a direct loan is made; begin employee retention provisions on the date loan funding is received; and, define "workforce" as full-time employees or full-time equivalents in workforce restoration and retention provisions. Charitable nonprofits are the nation's third largest employer and solely focused on making communities stronger. These recommendations will help keep us financially strong to meet communities' needs now and in the future.

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4/16/2020 1:36:00 PM	PIO (Email from	Fernandez	Evelyn	Evelyn.fernandez@upliftfs.org	Uplift Family Services	Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.
4/16/2020 1:38:00 PM	PIO (Email from	Holland	Jessyca	jessyca@c4atlanta.org	C4 Atlanta Inc	I am writing to implore you to include nonprofits in future expanded funding. Nonprofits, from cradle to grave, offering essential services to Americans. These are not services that exist in the marketplace and they are not services government has the proficiency and capacity to offer.  The nonprofit I lead is on the ground providing emergency support to workers in the arts and entertainment sector. We responded within a week of local quarantine by providing immediate cash assistance to freelance, &quot;gig&quot; workers who lost months worth of contracted work. Like other nonprofits, we are hyper local, non-partisan, and well regarded by community members who trust our efforts.  We are in a position of life and death, surviving vs. thriving, scenarios for over half the people whom we serve. We absorb the extra staff hours it takes to quickly and nimbly respond to crisis. We are your first wave of ground, first responders. Please include nonprofits in expanded funding. You need us and we need your support.  Respectfully,  Jessyca Holland Executive Director C4 Atlanta
4/16/2020 1:42:00 PM	PIO (Email from	Grundner	Chris	cgrundner@welfarefoundationde.org	Welfare Foundation, Inc.	Please add nonprofits and universities to this! They need this support too!
4/16/2020 1:43:00 PM	PIO (Email from	Porchia	Aaron	nia.443k@niabklyn.org		Please include non-profits in your expanded lending program, honoring funds that were committed for the current FY20 fiscal year.
4/16/2020 1:44:00 PM	PIO (Email from	Wood	Karan	KWood@EEAlliance.org	Environmental Education Alliance of GA	Please do not exclude nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia is home to over 300 nonprofit organizations with 500 or more staff members, each set to be left behind by this relief effort. Yet each is contributing to the survival of our communities and our nation during these challenging times.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis is inseparably related to the success of our nation's nonprofits. Thanks for your careful consideration of this matter.
4/16/2020 1:45:00 PM	PIO (Email from	Conroy	Paul	artistic@outfronttheatre.com	Out Front Theatre company	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.

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4/16/2020 1:46:00 PM	PIO (Email from	Spencer	Dwayne	dspencer@m emphishabita t.org	Habitat for Humanity of Greater Memphis	<p>As the President/CEO of a nonprofit providing vital services to individuals and families, it was disheartening to receive notice that the Federal Reserve Bank has chosen to exclude nonprofits from seeking financial relief through the Main Street Lending Program. Just as for-profit businesses, nonprofits urgently require additional financial aid at this time as they, too, are facing profound hardships.</p> <p>Nonprofits employ upwards of 12 million workers and contribute 10% of the U.S. GDP. Our payrolls exceed that of U.S. industries, including for-profit construction, transportation, and finance. As significant employers, it is critical that nonprofits are recognized along with for-profit employers and be given equitable relief to ensure that nonprofits can continue to provide services to our most vulnerable populations.</p> <p>History has proven, when a crisis hits, nonprofits are our economy's shock absorber and safety-net for Americans. Nonprofits in the weeks and months to come will undoubtedly need to provide services in a manner never seen before in our lifetime. The assistance that nonprofits provide to those in need must be safeguarded. I respectfully urge you to equitably treat and include nonprofits just as you do the for-profit sector in the Main Street Lending Program during the COVID-19 pandemic that is ravaging our country and creating enormous uncertainty among our citizens about what the new normal will look like for them and their families.</p>
4/16/2020 1:48:00 PM	PIO (Email from	Brawner	Rob	rob@atblp.org	Atlanta BeltLine Partnership	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits. Thank you.</p>
4/16/2020 1:49:00 PM	PIO (Email from	Colona	Bill	wcolona@for dham.edu	Fordham University	<p>On behalf of Fordham University, we write to request that the Federal Reserve update guidance to clarify that private, not-for-profit colleges and universities are eligible for the Main Street Lending program. In addition, we ask that guidance be updated so that student workers are exempted for the purpose of the employee threshold.</p> <p>Private, not-for-profit colleges and universities like Fordham University are major employers with significant economic impact in our communities. We are facing a major cash flow crisis caused by reduce revenue and increased spending resulting from the COVID-19 pandemic. Fordham University has an economic impact of more than \$1.4B in the New York metropolitan area and we support more than 8,000 direct and indirect jobs.</p> <p>Low-cost loans like the Main Street Lending program would help Fordham University address the financial impact of the COVID-19 crisis. We ask that the Federal Reserve update the guidance to clarify that public and private non-profit colleges and universities, with direct borrowing authority, are eligible for the Main Street Lending program and we also ask that student workers be exempted for the purpose of the employee threshold for eligibility (businesses with under 10,000 employees).</p> <p>Sincerely,</p> <p>Lesley A. Massiah-Arthur, AVP and Special Assistant to the President for Government Relations Bill Colona, Director of Government Relations</p>
4/16/2020 1:49:00 PM	PIO (Email from	Prophitt	David	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

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4/16/2020 1:51:00 PM	PIO (Email from	Rose	Jordan	jordan@scienceatl.org	Science ATL	<p>Please include nonprofit organizations in the Main Street Loan programs. We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:53:00 PM	PIO (Email from	Collins	Marika	mcollins@casapacific.org	Casa Pacifica Centers for Children & Families	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act I am affiliated with a nonprofit behavioral health organization serving vulnerable, high risk children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. The enabling legislation (CARES Act, Section 4003) expressly included nonprofit organizations between 500 and 10,000 employees, but it now appears the Federal Reserve's initial guidance for the Main Street Lending Program excludes nonprofits for eligibility. These critical providers of the nation's safety net are not eligible for the Paycheck Protections Program (PPP) (Sections, 1102, 1106) or the Economic Injury Disaster Loans (EIDL) (Section 1110) or other federal relief. This proposed action threatens the viability of larger nonprofits who provide aid to hundreds of thousands of children and families. Please include non-profits that employ over 500 employees in the Main Street Program to protect the critical safety net. Thank you.</p>
4/16/2020 1:53:00 PM	PIO (Email from	Reddick	Karen	kreddick@ncmstl.com	National Credit Management	<p>Institutions of higher education, often the largest or one of the largest employers in their local communities, are facing a major cash flow crisis in light of the reduced revenue and increased expenses imposed by the COVID-19 pandemic. Institutions expect to refund nearly \$8 billion in room and board charges alone. Some schools have also refunded tuition payments. Anticipated sources of auxiliary revenue have dried up as campus events have been canceled. Summer programs that provide revenue to many institutions also have been canceled.</p> <p>Many of our colleges and universities are seeking low cost loans to help address the financial impact of the COVID-19 crisis and are interested in accessing the credit and loans available under the Main Street Lending program, recently announced by the Federal Reserve.</p>
4/16/2020 1:54:00 PM	PIO (Email from	Cohen	Adam	adam@rallyfoundation.org	Rally Foundation for Childhood Cancer Research	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

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4/16/2020 1:55:00 PM	PIO (Email from	Flaker	Douglas	dflaker@hcpsocal.org	Health Center Partners of Southern California	Community Health Centers (CHCs) are non-profit businesses experiencing huge financial losses because of COVID-19. On average CHCs are seeing a drop in primary care visits of 50%. While the situation continues to evolve on the ground, data projections for California's CHCs suggests a shortfall of at least \$1 billion in revenue over the next three months. If such a reality were to come to pass, the ability to provide access to 7.2 million Californians will be at risk. Nationally, CHCs are the Health Homes for 29 million patients; we were at the frontline in the U.S. health care delivery system before COVID-19 and will remain at the frontline after it is gone. It is imperative that CHCs maintain their operations and staffing levels, both to keep our patients healthy, and to assist with diverting our patients from already overburdened hospitals. The SBA Payroll Protection Loan is a valuable resource many CHCs are applying for; however, with its 500-employee limit it is out of reach for 22 CHCs in California alone. These CHCs serve the largest number of patients are at the greatest risk of closing. Not only will they suffer the greatest revenue losses, ranging from \$5M-9M per entity, per month; they are also forced to endure this pandemic without the financial support that their smaller counterparts have access to, through SBA loans. We respectfully request CHCs with 500 or more employees be included to receive direct financial support via the Main Street Lending Program.
4/16/2020 12:00:00 AM	PIO (Email from	Aguilar	Jose	jfaguilar@staffproworkforce.com	Staff Pro	To Whom It May Concern,  On behalf of Staff Pro LLC dba as Staff Pro Workforce Solutions, I would like to receive more guidance on the application process for the Main Street Loan Facility program. Where I can find the website to apply for this program.  Thanks for your support.  Cordially, JFA.  J. Fernando Aguilar Cell Phone Number
4/16/2020 1:58:00 PM	PIO (Email from	Crowe	Reid	reid@rallyfoundation.org	Rally Foundation	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 1:58:00 PM	PIO (Email from	Glebocki	Terry	terry.glebocki@theoceanac.com	AC Ocean Walk	Ocean Casino Resort ("OCR") is the largest independently-owned casino and resort in Atlantic City, NJ. OCR employs nearly 3,000 workers. The term in the Main Street New Loan Facility (MSNLF) limiting the maximum loan size to 4x 2019 EBITDA arbitrarily precludes creditworthy businesses like OCR from participating in the MSNLF. JPMorganChase and other Eligible Lenders lend to OCR against the appraised value of its real estate (RE), and not its annual EBITDA. Lenders to companies that own RE, such as casinos, hotels, office buildings, retail centers, multifamily dwellings and other similar businesses, typically use appraised RE values to measure borrowing capacity. Typical leverage in commercial RE asset classes ranges between 65% and 75% of appraised value. Because of the stability and limited volatility of EBITDA in most commercial RE, leverage levels in companies that own and operate world-class RE like OCR tend to be higher than more volatile industries. The EBITDA leverage test arbitrarily harm owner-operators of high-quality RE who responsibly carry leverage above 4x while maintaining credit performance. The 4x test results in aid failing to reach a large portion of the commercial RE market. We urge the FRB to add an alternative leverage test of 65-75% of appraised value (calculated by an Eligible Lender using its customary practices) for industries that customarily use appraised RE values as the primary metric of borrowing capacity.
4/16/2020 1:58:00 PM	PIO (Email from	Hilligoss	Molly	molly@welcomingamerica.org	Welcoming America	I write in opposition to the exclusion of nonprofits from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as a for-profit business. The nonprofit sector is filling critical roles in the community and will be essential to EVERY communities' recovery. Again, please consider supporting the critical infrastructure of the non-profit ecosystem in this presented time. Thank you.



Main Street Lending Program Comments

4/16/2020 1:59:00 PM	PIO (Email from	Gillespie	Liz	Personal Email Address	MODA	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 1:59:00 PM	PIO (Email from	Gamez	Audrey	audrey@c4atlanta.org	C4 Atlanta	<p>I am in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. My nonprofit supports business development of for-profit arts business. So, I know how important it is to have a nonprofit like ours in the community. Whether it is through professional education, resiliency resources or serving as a training ground for future entrepreneurs/employees, we are not separate business ecologies. Taking out this critical link will cripple us and also provide fewer long-term recovery resources for the for-profit sector as well. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. HBCUs are critically important and uniquely endangered and must be included in any and all relief packages available. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:00:00 PM	PIO (Email from	Emery	Melissa	Personal Email Address	Greenbriar Children's Center	<p>I write to urge you to include nonprofits, institutes of higher learning, and HBCUs in the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits. We are "Main Street" just as much as any for-profit business.</p>
4/16/2020 2:04:00 PM	PIO (Email from	Kallos	Emily	emily@rallyfoundation.org	Rally Foundation for Childhood Cancer Reserach	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 2:05:00 PM	PIO (Email from	Ashe	Dan	dashe@aza.org	Association of Zoos and Aquariums	<p>On behalf of the Association of Zoos and Aquariums (AZA), I urge you to ensure that all AZA-accredited facilities are eligible for loans through the Main Street Lending Program.</p> <p>Founded in 1924, the Association of Zoos and Aquariums is a 501(c)3 non-profit organization dedicated to the advancement of zoos and aquariums in the areas of conservation, education, science, and recreation. AZA's 217 U.S.-based members collectively generate more than \$22 billion in annual economic activity and support more than 198,000 jobs. Approximately 54% of AZA-accredited facilities are non-profit, 35% are public, and 11% are for-profit. All of them are under tremendous economic stress because of the COVID-19 pandemic. These facilities face a unique challenge of needing to retain sufficient staff and supplies to care for animals while visitors are no longer coming through the gate. They cannot simply shut the gates and secure the facility, meaning that they continue incurring 40% or more of their operational costs, even when closed.</p> <p>Our nation's zoos and aquariums are community icons, businesses, and employers, and are facing an existential threat in facing this crisis. I strongly urge you to ensure that these facilities have the opportunity to obtain much-needed funds through this critical lending program.</p> <p>Sincerely,</p> <p>Dan Ashe President and CEO Association of Zoos and Aquariums</p>
4/16/2020 2:05:00 PM	PIO (Email from	Witkowski	Greg	Personal Email Address	Columbia University	<p>Dear Colleagues,</p> <p>I am writing to urge you to include nonprofit organizations in the Main Street Lending program. Nonprofits employ about 10 percent of the workforce in the United States and provide many of the services that we have come to count on, from education to medical care, to shelter and food, nonprofits provide for essential societal needs. They will be especially hard hit by the pandemic as they are likely to suffer a reduction in philanthropic dollars and an increase in needs among their clients. I'm happy to provide further data on the importance of nonprofit organizations and urge you to include them in your Mainstreet lending program.</p> <p>Best,</p>
4/16/2020 2:06:00 PM	PIO (Email from	Harvey	Ruth	ruth.harvey@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

Main Street Lending Program Comments

4/16/2020 2:06:00 PM	PIO (Email from	Ercan	Ebru	ebru@designwiththe3.com	Museum of Design Atlanta	<p>As a Board Member for the Museum of Design Atlanta, I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities.</p> <p>The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>The Museum of Design Atlanta (MODA) has been working tirelessly to bring needed enrichment activities to children and relief to their parents by providing valuable learning from trusted providers. That work continues even though MODA is strapped for cash. On premises revenue has been eliminated, donors have lost jobs and contributors, who are concerned about their business's future, are holding funds. We need help and OUR COMMUNITY NEEDS US, today and tomorrow.</p> <p>As large employers alone, non-profits like MODA deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>With local community leadership, nonprofits have held the country together through these days of hardship and unity. Please make it possible for our communities to emerge from this crisis whole by including nonprofits in the Main Street Loan program.</p>
4/16/2020 2:06:00 PM	PIO (Email from	Law	Stan	s.law@ymcawnnc.org	YMCA Of Northwest North Carolina.	<p>Hello:</p> <p>For 132 years the YMCA of Northwest North Carolina has provided valuable services and resources to the community. In 2019, we served 152,000 people in 7 counties. Prior to the pandemic and subsequent social distancing measures, our Y employed 1912 people (520 FTE), and has since laid-off 91% of its workforce. Between March 15th and June 30th, we are projecting a \$2.5M loss in revenue. There is the potential for additional losses due to the uncertainty of continued social distancing requirements when we are able to reopen. Despite these losses, the Y is committed to serving the community through the crisis. Over the past month we have offered emergency child care to essential workers, food distribution (over 5000 meals served so far), made thousands of wellness calls to seniors, and transitioned multiple branches for weekly blood drives. Our communities need nonprofits like the Y now more than ever. The CARES Act was a first step toward supporting nonprofits through the economic crisis stemming from the COVID-19 pandemic, but more help is needed for those with 500+ FTE employees. Without additional resources, many nonprofit organizations will be lost to their communities, including larger non-profits, like the YMCA. Your support would ensure that we can continue to provide urgently needed services for our communities and continue to support our staff as one of the larger employers in the region. We thank you for your service and your consideration.</p>
4/16/2020 2:07:00 PM	PIO (Email from	Duffy	Shauna	shauna.duffy@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

Main Street Lending Program Comments

4/16/2020 2:07:00 PM	PIO (Email from	Hudson	Gregory	gjHUDSON@COMERICA.COM	Comerica Bank	<p>Dear Sir or Madam:</p> <p>Comerica Bank appreciates the opportunity to provide some feedback on the Federal Reserve's Main Street New Loan Facility and Main Street Expanded Loan Facility. We believe these lending programs have the potential to provide significant and rapid relief to a large number of small and medium businesses and other eligible borrowers and their employees.</p> <p>Terms and Conditions of Program. We request that consideration be given to striking the 2019 EBITDA multiples as part of the definition for an Eligible Loan and simply apply the proposed dollar amounts as the limits. This would permit banks to take into account not only pre COVID-19 financial performance but also would allow the banks to evaluate post COVID-19 conditions and provide more flexibility around EBITDA multiples.</p> <p>Program roll-out. Overall, the lending programs should avoid unnecessary complexity. This could include promoting the development of standard documents where applicable. If possible, FAQs should be vetted by the participating banks before distributed publicly.</p> <p>Interest rate. The proposed term sheets for the program considers SOFR as the applicable rate. However, many banks may have operational difficulties using SOFR. Moreover, SOFR may not be acceptable to small and middle market borrowers. Nevertheless, if SOFR is used, other versions of SOFR may be more palatable, e.g., overnight, simple SOFR, weighted average in advance or in arrears.</p>
4/16/2020 2:07:00 PM	PIO (Email from	Balko	Marina	marina.balko@AS220.ORG	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>
4/16/2020 2:07:00 PM	PIO (Email from	Smith	Lara	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 2:07:00 PM	PIO (Email from	Quaadman	Tom	tquaadman@uschamber.com	U.S. Chamber of Commerce	<p>The Chamber supports the PMCCF, but encourages the Federal Reserve to address:</p> <p>Is the 130% test applicable only while the issuer has bonds/loans held by the PMCCF? Is it a maintenance or incurrence test? Is it based on notional or balance sheet value?          What are the repercussions of breaching the 130% limit?          Can affiliate issuers with the same parent access the PMCCF if they meet the criteria?          If the holding company is assumed to be the issuer, how does the issuer account for bonds and loans issued to third parties via subsidiaries?          For split-rated issuers, should the higher or lower rating be referenced?          Are U.S. subsidiaries of foreign parents, with operations primarily in U.S., eligible?          Is eligibility impacted if an issuer is (i) owned by a foreign parent or (ii) receives a guarantee from a foreign parent of a U.S. issuer?          Do secured forms of debt/loans qualify? Do subordinated bonds/loans qualify?          Will the Federal Reserve consider amending ratings eligibility to include additional issuers?          Who is responsible for setting/approving the list of participants?          What documentation, disclosures, other readiness must be undertaken?          Is there a date participants need to sign up by to access the PMCCF?          Is the PMCCF available to participants during an issuer's blackout periods?          Does the PMCCF intend on lending out the securities at a future date?</p>
4/16/2020 2:08:00 PM	PIO (Email from	Jackson	Ryan	ryan@lifegategroup.org	LifeGate Counseling Center	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>As the Executive Director of a counseling center, and a therapist who provides emotional support for members of the community, our practice (amongst many others) is vitally important to the emotional well being of individuals, couples and families dealing with the fall out of this pandemic.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Thank you for your time and work,          Ryan Jackson, LMFT</p>
4/16/2020 2:08:00 PM	PIO (Email from	Lopez	Gianelli	Personal Email Address	Museum of Design Atlanta	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as a for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically essential and uniquely endangered and must be included in any relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 2:09:00 PM	PIO (Email from	Hayes	Katie	katie@cfmatl.org	Community Farmers Markets	<p>I am writing to express my strong opposition to exclusion of nonprofits, nonprofit institutes of higher learning, and HBCUs from the Main Street Loan Program.</p> <p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:11:00 PM	PIO (Email from	Doss	Jonathan	Personal Email Address	Out Front Theatre company	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:12:00 PM	PIO (Email from	Cormier	Joshua	Josh.cormier@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>
4/16/2020 2:12:00 PM	PIO (Email from	Watson	Olivia	olivia.watson@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

Main Street Lending Program Comments

4/16/2020 2:13:00 PM	PIO (Email from	Quaadman	Tom	tquaadman@uschamber.com	U.S. Chamber of Commerce	<p>The Chamber supports the SMCCF, but encourages the Federal Reserve to address:</p> <p>We are concerned that given the terms and conditions of the facility only a small portion of the market that requires assistance will actually be able to avail themselves of the SMCCF. To ensure that the facility is as impactful as intended, we recommend increasing (i) from 5 to 10 years the final maturity of eligible bonds to expand the reach of the program and (ii) from 1.5% to 2.0% the per issuer cap of the total program size to accommodate issuers with larger debt footprints in the market.</p> <p>Who is responsible for setting and approving the list of participants?          Are U.S. investors with a foreign parent considered eligible sellers?          How will "fair market value" pricing be determined?          Could issuers sell their own debt to the facility that have been purchased in the secondary markets through the ordinary course of market-making?          How will the Fed allocate the capacity firms could utilize by issuer or seller?          The eligibility of a branch/agency of a foreign bank should be clarified.          What documentation, disclosures, other readiness must be undertaken?          Is there a date participants need to sign up by to access the SMCCF?          Does the SMCCF intend on lending out the securities at a future date?          Does the Fed intend on holding purchased assets to maturity?</p>
4/16/2020 2:13:00 PM	PIO (Email from	McMaster	Belle	bmcmast@mory.edu	Retired	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:14:00 PM	PIO (Email from	Newman	C	christopher.newman@mdpweb.net	Mortenson Dental Partners	<p>As one of the largest doctor-owned group practices and Dental Services Organizations in the country, Mortenson Dental Partners (MDP) would first like to express its gratitude and acknowledge the promising nature of the Main Street Program. It will provide critical funding for companies like ours who have been impacted by COVID-19 and, in particular, government restrictions on operations. These restrictions have resulted in around 90% reduction in productivity. MDP is concerned, however, about proposed restrictions and contingencies regarding qualification or default provisions. For example, while MDP intends to continue to employ 100% of its workforce, it cannot predict local governmental restrictions, the timing of their lift, or future patient demand. As such, and given that the loan is not designed to be forgiven, we respectfully request that much deference be given to companies with regard to its obligation to retain workers by acknowledging that, through no fault of the employer, it might not have the demand to justify its current workforce. Given that fact, any provision restricting funds or causing a default related to worker retention, should be excluded.</p>
4/16/2020 2:16:00 PM	PIO (Email from	Clausen	Susan	susan@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

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4/16/2020 2:19:00 PM	PIO (Email from	Meehan	Michael	mjmeehan@diveplane.com	Diveplane	Diveplane is a leader in natively-explainable artificial intelligence, and like so many early stage companies we reinvest all the money we bring in to make our products better, and expand the reach of where our technology can help companies and people. (For example, we are currently working with a top hospital to create a statistical &quot;twin&quot; of medical data restricted by HIPAA in order to help them unlock further research using the statistical &quot;twin&quot; data.). As such, we request that alternative metrics other than EBITDA be used for determining loan minimums and eligibility, such as (i) as a percentage of enterprise valuation, (ii) determined by commonly accepted debt/equity metrics on a per industry basis and/or (iii) as determined by the lending bank (who retains 5% risk) in applying reasonable underwriting criteria relevant to growth-stage companies, such as cash on hand, existing debt, operating costs, gross margins, etc. Use of alternatives to EDITDA could allow Diveplane to qualify for the Main Street Lending Program. Further, our receipt and reinvestment of these funds will allow for employee retention, and perhaps even job creation, two things that are needed now more than ever. Thank you
4/16/2020 2:19:00 PM	PIO (Email from	Madden	Grace	Personal Email Address		I am writing in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 2:19:00 PM	PIO (Email from	Dvorchak	David	David.dvorchak@as220.org	AS220	Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.
4/16/2020 2:20:00 PM	PIO (Email from	Friesen	Tiffany	tiffany@secf.org	Southeastern Council of Foundations	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.



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4/16/2020 2:20:00 PM	PIO (Email from	Simon	Barry	barry.simon@oakhillct.org	Oak Hill	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, please consider that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;          Payments shall not be due until two years after a direct loan is made;          Employee retention provisions should begin on the date that loan funding is received by the borrower; and          In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p> <p>As you may know, many nonprofits employ more than 500 employees and have not been able to access the Paycheck Protection Program, which contains loan forgiveness provisions that are critical to these organizations, and necessary to help ensure they will be able to continue to provide services during the crisis and assist with our nation's recovery efforts when the crisis is over.</p> <p>Thank you;          Barry Simon</p>
4/16/2020 2:20:00 PM	PIO (Email from	Nugent	Virginia	virginia@susannahdarrow.com	Susannah Darrow Consulting	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:22:00 PM	PIO (Email from	Parker	Adam	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:23:00 PM	PIO (Email from	Richie	Norman	Personal Email Address		<p>Please include nonprofits in your program for Main Street lending. They are a critical part not only of our economy, but also of our society, and are actually hurting more than most other businesses right now.</p> <p>Thanks for your consideration.</p> <p>Sincerely,          Norm Richie          Citizen          404-218-9222</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

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4/16/2020 2:23:00 PM	PIO (Email from	Crater	Amanda	mandy@homeaidatlanta.org	HomeAid Atlanta	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:24:00 PM	PIO (Email from	Minitier	Janelle	jminiter@museumofdesign.org	Museum of Design Atlanta	<p>As an individual who has been working in the arts &amp; cultural museum sector in Georgia for the past five years, I am writing in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street Loan Program. In short: The nonprofit sector is just as critical to economic stability and recovery as the for-profit sector.</p> <p>Georgia's museum sector has a financial impact of \$1.6 billion on the state's economy (American Alliance of Museum and Oxford Economics, 2017). Georgia's museums and 300+ nonprofit organizations, with 500 or more staff members, each doing vital work during this unprecedented time, are currently excluded from the Main Street Loan Program.</p> <p>As large employers, nonprofits, institutes of higher learning, and HBCUs deserve federal support. These organizations also support an array of small businesses, serve as economic anchors in their communities, and supply critical services at a scale that would be impossible to replace. In particular, HBCUs are critically essential and uniquely endangered and must be included in any and all relief packages available.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis also depends on the success of our nation's nonprofits.</p>
4/16/2020 2:25:00 PM	PIO (Email from	Brathwaite	Joy	jbrathwaite@mcad.edu	Minneapolis College for Art and Design	<p>I submit the following comments in regards to the Main Street Lending program. Specifically, we ask that the Federal Reserve update the guidance to clarify that non-profit private and public institutions are eligible for the Main Street Lending program.</p> <p>Institutions of higher education, often the largest or one of the largest employers in their local communities, are facing a major cash flow crisis in light of the reduced revenue and increased expenses imposed by the COVID-19 pandemic. Institutions expect to refund nearly \$8 billion in room and board charges alone. My institution refunded almost 10% of our usual revenue to students for room and other refunds.</p> <p>Institutions of higher education are often the largest, or one of the largest, employers within their community and larger region. Please make not non-profits IHE eligible. It is vital to provide this access to low-interest loans to non-profit colleges and universities financially devastated by the pandemic.</p>
4/16/2020 2:25:00 PM	PIO (Email from	Reyes	Arturo	rcastaneda-calleros@riohondo.edu	Rio Hondo College	<p>On behalf of Rio Hondo College, I am writing to request that eligibility guidelines for the "Main Street" lending program be modified to include non-profits and institutions of higher learning. While it is laudable for the Federal Reserve to provide loans to businesses, it is critical that non-profit organizations and higher education institutions also have an opportunity to apply for these loans. Rio Hondo College, like so many other higher education institutions, is facing myriad challenges. In our effort to ensure that our College is receiving the funding needed to provide quality education, while still addressing basic needs of students, our campus faces multiple demands. Our staff are working on how to meet mandated faculty obligation numbers, while attempting to adjust to a new student-centered funding formula. Furthermore, our College is nearing the end of a 15-year construction bond, but still has numerous facilities infrastructure needs. Being able to apply for new loans of \$1 million to \$25 million will help our College to meet hiring obligations, cover costs of instructional technology, invest in professional development activities, and bolster student services for our diverse student body. Thank you for your consideration of this request.</p> <p>Sincerely, Dr. Arturo Reyes</p>
4/16/2020 2:26:00 PM	PIO (Email from	Furey	Martin	Martin.Furey@sdaihc.org	San Diego American Indian Health Center	<p>Please extend the Main St. Lending Program to NONPROFIT organizations with budgets under \$20 Million. Small to medium size nonprofits are enormously strained at the moment, and they provide a large portion of our national safety net's service delivery. Thanks for your consideration of this change.</p>

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4/16/2020 2:28:00 PM	PIO (Email from	walther	kimberly	kimberly@rallyfoundation.org	Rally Foundation for Childhood Cancer Research	<p>I am writing in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Thank you, Kimberly Walther</p>
4/16/2020 12:00:00 AM	PIO (Email from	Cross	R.J.	rj@pirg.org	U.S. PIRG	<p>The Fed is taking unprecedented action to stabilize our economy, and that comes with unprecedented responsibility to inform and engage the public. First, our officials need access to timely and detailed information on all money lent &amp; spent in order to ensure the public's best interest is being served. The Fed must frequently disclose to the Congressional Oversight Commission what firms are receiving loans and on what terms as described by Bharat Ramamurti in a letter to Chairman Powell earlier this week. Second, the Fed must then make that information available online for the public. The situation demands riskier action than the Fed has ever taken, using taxpayer dollars as a backstop, and that means taxpayers should be able to see who is benefiting from Fed assistance. With so many Americans struggling to meet their most crucial needs, we must guarantee all funds are being used as effectively as possible, and true transparency is essential for ensuring that happens.</p>
4/16/2020 2:29:00 PM	PIO (Email from	Nelson	Jillian	Personal Email Address	Silverstar Car Wash	<p>We are a small business in the Midwest with over 180 employees, and believe we would be able to utilize this program to not only keep our payroll intact, but to grow new jobs. The three banks we contacted in Fargo, ND, Sioux Falls, SD and Sioux City, IA were not familiar with the Main Street program. Any resources you may have of participating banks in the North Dakota, South Dakota or Iowa area would be appreciated.</p>
4/16/2020 2:31:00 PM	PIO (Email from	Keith	Colleen	keithcp@gbc.edu	Goldey-Beacom College	<p>I encourage you to include non-profits and the college/university community in this lending program. As the president of a college whose majority student body are members of minority communities, having this opportunity would be a welcome one.</p>
4/16/2020 2:34:00 PM	PIO (Email from	Hurst	Jean	jkh@hbeadvocacy.com	Urban Counties of California	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. Our organization includes 14 of California's largest counties, which work collaboratively with nonprofit behavioral health organizations serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>
4/16/2020 2:36:00 PM	PIO (Email from	Naselli	Mike	Personal Email Address	BPD Support Services LLC	<p>Can you please provide me more information regarding the launch of this program? Is the minimum loan amount 1MM?</p> <p>Thank you</p>
4/16/2020 2:36:00 PM	PIO (Email from	Farry	Kristen	kfarry@woods.org	Woods Services	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> <li>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</li> </ul>

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4/16/2020 2:36:00 PM	PIO (Email from	Karesh	Kim	kkaresh@nashvilleliteracy.org	Nashville Adult Literacy Council	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:39:00 PM	PIO (Email from	Colbert	Laura	lcolbert@healthyfuturega.org	Georgians for a Healthy Future	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:39:00 PM	PIO (Email from	Leventhal	Max	Personal Email Address	Robert SW. Woodruff Arts Center, Inc.	<p>We write in opposition to the exclusion of Arts nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Sincerely, Max Leventhal</p>
4/16/2020 2:39:00 PM	PIO (Email from	Farris	Janelle	jfarris@wear ebscs.org	Brooklyn Community Services	<p>Nonprofits in New York account for 18% of the private workforce, and contribute \$800 billion in wages. We have experienced severe financial losses and layoffs due to COVID-19. Please include Non-profits in eligibility requirements for the Main Street Lending program.</p>
4/16/2020 2:39:00 PM	PIO (Email from	Gregory	Patty	patty@bluebirdconsultants.com	Bluebird Communications Consultants	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

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4/16/2020 2:41:00 PM	PIO (Email from	Berrick	Ken	hope_kamer@senecacenter.org	Seneca Family of Agencies	<p>Seneca is the largest provider of children’s behavioral health in the state of California and serve thousands of children and their families across a continuum of service settings during the most difficult times of their lives. As this pandemic continues to create new funding challenges for nonprofits such as Seneca, I ask that you consider the below priorities when forming the next stimulus opportunity. As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D) to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, I request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization</p> <p>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</p> <p>Payments shall not be due until two years after a direct loan is made</p> <p>Employee retention provisions should begin on the date that loan funding is received by the borrower</p> <p>In implementing any workforce restoration and retention provisions, “workforce” should be defined as full-time employees or full-time equivalents</p> <p>I urge you to consider the above provisions so that together, we can ensure that the public health crisis of COVID-19 does not becomes a mental health crisis as well.</p> <p>Thank you for your dedicated leadership and extreme care during this time.</p>
4/16/2020 2:42:00 PM	PIO (Email from	Holloway	Raphael	rholloway@gatewayctr.org	Gateway Center	<p>As the CEO of Atlanta Georgia’s largest homeless resource center, we write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as the for-profit business sector.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers they deserve federal support. These non-profit institutions supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation’s recovery from this unprecedented crisis is dependent on the success of our nation’s nonprofits to remain in-tact and supporting the citizens in their communities as a service provider and employer.</p>
4/16/2020 2:42:00 PM	PIO (Email from	Conaway	Mike	director@healingbridgeclinic.org	Healing Bridge Clinic	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation’s recovery from this unprecedented crisis depends on the success of our nation’s nonprofits.</p>
4/16/2020 2:43:00 PM	PIO (Email from	Castillo	Rachel	rachel@advocatesforchildren.org	Advocates for Children	<p>Good Afternoon,</p> <p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. As a Children’s Home, it is imperative to the safety and security of the children we serve to remain open. If the PPP loan runs out before we are funded, I am not sure how we will be able to continue providing our current level of services.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation’s recovery from this unprecedented crisis depends on the success of our nation’s nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 2:45:00 PM	PIO (Email from	Ginsburg	Dan	dan.ginsburg@rsmus.com	RSM US LLP	<p>RSM US LLP has submitted a more expansive version of the following comments via email to Fed Sec. Misback.</p> <p>Passthrough Exemptions: Clarity needed re ability for private businesses and flow through businesses (Partnerships, S Corps, LLCs) to make tax distributions without violating rules.</p> <p>Loan Restrictions: Confirmation needed re CARES Act restrictions under 4003(c)(3)(D)(i) on outsourcing/collective bargaining/union organizing not required under 4003(c)(3)(A)(ii).</p> <p>EBITDA Clarity: Consideration should be given to basing EBITDA restrictions on an average of 3 prior years to avoid unintended exclusion of companies that experienced one-time issues.</p> <p>Loan Timing: Clarification needed re at what point/on what date is the undrawn portion under the expanded loan facility measured, specifically the 30% limitation.</p> <p>Compensation: Allowance should be considered for commissions or other variable items previously committed to in employment arrangements that might result in an employee receiving over \$425k annually.</p> <p>Affiliation Rules: Confirm no limitation preventing portfolio-backed companies from MS program access.</p> <p>Foreign Entities: Confirm access for foreign-owned companies with many US based employees.</p> <p>Small Company Access: Allow for smaller businesses and the 72 NAICS code businesses to obtain PPP and MS loans.</p> <p>Attestation: Clarify attestations/certifications received from borrowers are sufficient for lenders. Potential CPA firm involvement is unclear.</p>
4/16/2020 2:46:00 PM	PIO (Email from	de Wilde	Richard	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits. Sincerely, Richard de Wilde</p>
4/16/2020 2:47:00 PM	PIO (Email from	Pascual	Aixa	Personal Email Address	Latin American Association	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Thank you for your consideration.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 2:47:00 PM	PIO (Email from	Bornfreund	Matthew	matthew.bornfreund@venable.com	Venable LLP	<p>This comment is being submitted by Matthew Bornfreund, an attorney at Venable LLP, Washington, DC.</p> <p>Venable LLP has the country's largest nonprofit practice, and on behalf our nonprofit clients, we respectfully request that the Board of Governors of the Federal Reserve System ("Board") make two clarifications regarding the Main Street Lending Program and its associated term sheets.</p> <p>First, we request the Board confirm our understanding that "Eligible Borrowers" include nonprofit organizations that are exempt from federal income tax under section 501(a) of the Internal Revenue Code of 1986 and that meet all other requirements to be an Eligible Borrower.</p> <p>Second, with respect to calculating the maximum loan size for an Eligible Loan, we request the Board clarify that nonprofit organizations may use revenue less expenses (as reported on Part I, Line 19 of IRS Form 990 or Part I, Line 27a of Form 990-PF, or in a financial statement) instead of EBITDA. Many nonprofit organizations do not calculate EBITDA, and revenue less expenses, which is more commonly used by nonprofits, is substantially the same as EBITDA.</p> <p>Thank you for your consideration.</p>
4/16/2020 2:47:00 PM	PIO (Email from	OKeefe	Rob	Rob@SeeMonterey.com	Monterey County CVB	<p>Hello,</p> <p>I'm very concerned about how various stimulus packages including the Main Street Lending program do not allow for non-profits, specifically, 501c6 organizations such as mine. This exclusion ignores the very significant impact such organizations have on community growth and stability. In my instance, Tourism is one of the top drivers of the economy in Monterey County and top provider of jobs. Yet we are funded by the very thing this such down prevents - travel. We must have access to favorable grants and loans to survive. Your consideration is appreciated.</p> <p>Rob O'Keefe</p>
4/16/2020 2:47:00 PM	PIO (Email from	Larivee	John	jjarivee@crj.org	Community Resources for Justice	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, Community Resources for Justice requests that the program:</p> <ul style="list-style-type: none"> <li>+ Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>+ Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>+ Payments shall not be due until two years after a direct loan is made;</li> <li>+ Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> <li>+ In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</li> </ul> <p>Thank you for your consideration.</p>
4/16/2020 2:48:00 PM	PIO (Email from	Moody	Kara	Personal Email Address	MODA	<p>As a Board Member for the Museum of Design Atlanta, I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities.</p> <p>The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>The Museum of Design Atlanta (MODA) has been working tirelessly to bring needed enrichment activities to children and relief to their parents by providing valuable learning from trusted providers. That work continues even though MODA is strapped for cash. On premises revenue has been eliminated, donors have lost jobs and contributors, who are concerned about their business's future, are holding funds. We need help and OUR COMMUNITY NEEDS US, today and tomorrow.</p> <p>As large employers alone, non-profits like MODA deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>With local community leadership, nonprofits have held the country together through these days of hardship and unity. Please make it possible for our communities to emerge from this crisis whole by including nonprofits in the Main Street Loan program.</p>

Main Street Lending Program Comments

4/16/2020 2:49:00 PM	PIO (Email from	Harris III	Sam	sam@bluedolphincap.com	Blue Dolphin Capital, Inc	<p>Blue Dolphin Capital Comment:</p> <ol style="list-style-type: none"> <li>Under the MSNLF, loans are available up to the greater of: <ul style="list-style-type: none"> <li>(i) \$25 million; or</li> <li>(ii) An amount that, when added to the eligible borrower's existing outstanding and committed but undrawn debt, does not exceed ten times the eligible borrower's 2019 EBITDA.*</li> </ul> </li> <li>Under the MSELF, loans are available up to the of: <ul style="list-style-type: none"> <li>(i) \$150 million;</li> <li>(ii) Fifty percent of greater eligible borrower's existing outstanding and committed but undrawn bank debt; or</li> <li>(iii) An amount that, when added to the eligible borrower's existing outstanding and committed but undrawn debt, does not exceed twelve times the eligible borrower's 2019 EBITDA.*</li> </ul> </li> <li>The Main Street SPV on a recourse basis, providing leverage that is expected to result in up to \$600 billion in new or expanded bank loans to eligible borrowers. We recommend of the 600 Billion program to earmark 25 percent of the program specifically for Black Borrowers who are at an disadvantage. Black owned firms need a special loan program without recourse. If Treasury does not implement this comment as apart of its guidance's more than fifty percent of Black owned firms will close and never return to the marketplace.</li> <li>Add CDFI as a options to receive funding for Black Owned firms.</li> </ol> <p>Best Regards,</p> <p>Sam Harris III Blue Dolphin Capital President and CEO</p>
4/16/2020 2:51:00 PM	PIO (Email from	Szuflita	Terri	tszuflita@people-inc.org	People Inc	<p>I have been with People Inc for almost 30yrs and am one of 4,000 employees. We are a regional non-profit health and human services agency that provides programs and services to nearly 10,000 people with intellectual and developmental disabilities, special needs, their families and older adults throughout various counties in Western New York and the Greater Rochester region, I am writing today to inform you that our agency, People Inc., is fully engaged in dealing with the COVID-19 crisis. We ensure that our homes and services for people with disabilities remain as safe as possible and are staffed round the clock. The vulnerable people that depend on us deserve this care. However, because we are providing essential services during the crisis, People Inc. has incurred highly unusual increased costs in staffing, PPE, and cleaning services.</p> <p>We are not eligible for the Payroll Protection Program (PPP) due to our size and we must remain fully operational, we request that the Mid-Size Loan Program have provisions to convert to a forgivable loan for nonprofits that face staggering losses due to COVID-19. This would grant us the same protections as PPP.</p> <p>Thank you in advance for your support of direct care staff, the people we support and our agency, People Inc</p>
4/16/2020 2:52:00 PM	PIO (Email from	Bruner	Kyle	Personal Email Address		<p>It appears that the MSNLF and MSELF would disproportionately help businesses that lease versus companies that own large amounts of real estate. For Medium Sized companies, like the Fitness industry that were excluded from the PPP, using a metric like EBITDARM would make much more sense. This is especially true for hospitals!</p>
4/16/2020 2:53:00 PM	PIO (Email from	Dixon-Billups	Erica	Erica.Dixon-Billups@miamidade.gov	Miami-Dade County	<p>I believe it is important to include the nonprofit organization and universities in the lending opportunities due to the COVID-19 Pandemic. Simply because these entities provide services to the public and employ personnel as well. Due the mandatory shutdown to mitigate the spread of the coronavirus, they have encountered losses as well: so many scheduled initiatives that would have incurred funding and revenue has been impacted. I feel the support is needed to sustain the services that are provide to help develop our leaders of tomorrow.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.



Main Street Lending Program Comments

4/16/2020 2:53:00 PM	PIO (Email from	Keenan	Vincent	vkeenan@iafp.com	Illinois Academy of Family Physicians	<p>As part of the bipartisan CARES Act, the Federal Reserve recently announced its new "Main Street" lending facility. This facility will support up to \$600 billion in bank lending to small and mid-sized businesses, including two lending options: new loans of \$1 million to \$25 million, or expansion of a business's existing loan with a bank to up to \$150 million. Unfortunately, the Administration and the Federal Reserve, as of today, are considering the exclusion of nonprofits, many institutions of higher learning and Minority-Serving Institutions. This is a significant negative blow in particular to entities that are also ineligible for the Paycheck Protection Program.</p> <p>Associations are non-profit organizations helping our members to cope with the COVID19 crisis. As our members suffer, so do our organizations. Please include associations in the Main Street Lending opportunity</p>
4/16/2020 2:57:00 PM	PIO (Email from	Leonhard	Tom	tom.leonhard@hriproperties.com	HRI Properties	<p>The MSELP requires an applicant to have a prior term loan. This provision, not required by The CARES Act, has largely made the MSELP unusable for companies utilizing special purpose entities ("SPE") to finance projects. Many companies that sponsor development projects do not have term loans. These companies use an SPE, which (i) owns the project's assets, (ii) is the project contracting entity, and (iii) arranges funding from the SPE's owners and lenders through asset-based financing. Usual sources of asset-based financings are unavailable, even for shovel-ready projects. Without MSELP funding, projects will be abandoned, with a devastating effect on employees and community. Favoring companies with prior term loans over companies with no term debt but a proven record of project execution is neither fair nor required.</p> <p>We also request clarification that the term sheet provisions that prohibit dividends, stock buybacks, or compensation increases will not be imposed on SPE owners.</p> <p>Using EBITDA to determine the maximum borrowing amount does not work for an SPE without a prior history. We recommend relying on the lender's underwriting expertise that will focus on assessing project viability, collateral value, and ability to repay. Asset-based financings are not unusual and underwriting factors utilized by lenders for these loans should be satisfactory.</p>
4/16/2020 2:57:00 PM	PIO (Email from	Folio	Patricia	Personal Email Address	Act3 Productions	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 2:59:00 PM	PIO (Email from	Walsh	Neal	neal@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

Main Street Lending Program Comments

4/16/2020 3:00:00 PM	PIO (Email from	Chandler-Och	Jerriann	jchandleroch oa@hscfs.org	Hathaway-Sycamores Child and Family Services	<p>I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California.</p> <p>I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following:</p> <ul style="list-style-type: none"> <li>oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>oPayments should not be due until two years after a direct loan is made</li> <li>oEmployee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>oIn any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents</li> </ul>
4/16/2020 3:02:00 PM	PIO (Email from	Gump	Warren	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:02:00 PM	PIO (Email from	Mattson	Kevin	kmattson@sy health.org	San Ysidro Health	<p>Very disappointed that this program is not available to nonprofit organizations. To date there is no program for a nonprofit organization with over 500 employees and we are being hit very hard by the impact of COVID-19</p>
4/16/2020 3:04:00 PM	PIO (Email from	Simon	Gregg	gsimon@mac oc.com	Metro Atlanta Chamber	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:04:00 PM	PIO (Email from	Kaplan	Lawrence	lawrencekapl an@paulhasti ngs.com	Paul Hastings. LLP	<p>We write to provide feedback sought by the Federal Reserve in its announcement of additional actions on April 9, 2020 to address the significant unmet needs of mid-sized companies, many of which will suffer catastrophic effects from the COVID-19 crises.</p> <p>Mid-sized companies frequently cannot obtain credit from banks, which often seek to minimize their risk profile by lending only to established organizations or entities not engaged in activities that many mid-sized entities engage in. As a result, many mid-sized companies need to obtain credit from non-bank specialty finance companies that have emerged to meet the unmet demand for credit. Limiting participation in the Main Street programs to only banks fails to address the financial needs of many mid-size companies.</p> <p>Similarly, given that the terms of the facilities require a bank to retain a 5% participation in any loan it originates, banks with credit policies that preclude lending to mid-sized companies or those engaged in specific industries will not be willing to originate loans under the program, failing to address the financial needs of mid-sized companies.</p> <p>Accordingly, we request the Federal Reserve modify the Main Street Facilities to (i) allow non-banks to participate; and (ii) eliminate the need for originating lenders to retain 5% of any loan originated under the program. Both modifications will preserve mid-sized companies and their employees.</p>

Main Street Lending Program Comments

4/16/2020 3:05:00 PM	PIO (Email from	Leach	Mary	Personal Email Address	the Wylde Center	<p>Nonprofits are critical to the economic well being of our communities. They are working over capacity to provide nutrition and support due to the economic slowdown and food scarcity caused by COVID-19.</p> <p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:06:00 PM	PIO (Email from	Benton	Mary	mary.benton@alston.com	Alston & Bird	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:06:00 PM	PIO (Email from	Schillace	Kim	kschillace@roadrunner.com	People Inc.	<p>In support of the 4,000 employees of a regional non-profit health and human services agency that provides programs and services to nearly 10,000 people with intellectual and developmental disabilities, special needs, their families and older adults throughout numerous counties in Western New York and the Greater Rochester region, I am writing today to inform you that People Inc. is fully engaged in dealing with the COVID-19 crisis. They must ensure that more than 150 community-based homes and services for people with disabilities remain as safe as possible and are staffed 24/7. The vulnerable people that depend on People Inc. deserve no less. However, because they are providing essential services during the crisis, People Inc. has incurred highly unusual increased costs in staffing, PPE, and cleaning services.</p> <p>Since People Inc. is not eligible for the Payroll Protection Program (PPP) due to their size and the fact that they must remain fully operational, we request that the Mid-Size Loan Program have provisions to convert to a forgivable loan for nonprofits that face staggering losses due to COVID-19. This would grant them the same protections as PPP.</p> <p>Thank you in advance for your support of direct care staff, the people they support and People Inc.</p>
4/16/2020 3:06:00 PM	PIO (Email from	Williams	Karen	kwilliams@advocates.org	Advocates	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, I request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> <li>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</li> </ul> <p>Thank you for your consideration Karen Williams</p>

Main Street Lending Program Comments

4/16/2020 3:07:00 PM	PIO (Email from	Biddy	Darlene	Personal Email Address		Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.
4/16/2020 3:08:00 PM	PIO (Email from	Conely	Whitney	Personal Email Address		Despite our facilities being closed, our Y is providing child care for Health, Emergency and other essential services as outlined by the Governor's Office; Teen Shelter for homeless and neglected/abused youth; Shelter for homeless men; Making hundreds of welfare calls; Offering thousands of virtual experiences for activity, engagement, and connectedness.  It is so important to our community to keep the YMCA's of Greater Louisville going!
4/16/2020 3:09:00 PM	PIO (Email from	Suguitan-Lee	Heather	Personal Email Address		Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.
4/16/2020 3:12:00 PM	PIO (Email from	Cook	Tracy	tcook@prokids.org	ProKids	Nonprofits have substantial leverage in terms of both employment of workers and service to those greatly affected by COVID-19 and the related economic downturn. As a result, nonprofits should be prioritized in any further action taken in response to COVID-19 and its impact to create forgivable loan opportunities. The short and long-term health of our communities and economy are dependent upon more robust action to support the work and employees of nonprofits, during these incredibly challenging and pivotal times.
4/16/2020 3:13:00 PM	PIO (Email from	Ward	Calvin	Personal Email Address		Save our Not for Profits, they are assisting families during this pandemic.
4/16/2020 3:13:00 PM	PIO (Email from	Hardin	Edward j	Ejh@rh-law.com	Multiple	Please include non-profit Organizations as eligible under the Main Street Loan. These large employers, poverty fighting and educational institutions are essential to our economy and their survival is critical to their employees.
4/16/2020 3:14:00 PM	PIO (Email from	Cooper	Kelly Tonina	Personal Email Address	Atlanta Ballet, Out Front Theatre	I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as a for-profit business.  Nonprofit institutions serve thousands of people in every community: feeding the hungry, offering help for the disenfranchised, and raising the spirit of humanity through art, dance, and song - the very things many people are relying on to get through this pandemic.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 3:15:00 PM	PIO (Email from	Rohleder	Mary	arohleder@tvc.com	Ms.	Please ensure nonprofits are explicitly named as eligible recipients of the Main Street Lending Program. Despite being closed, our Y is providing child care for Health, Emergency and other essential workers as requested by our Governor. Our Teen Shelter for homeless and abused youth has remained open, as well as our shelter for homeless men. Volunteers have made wellness calls to our more delicate members and we are holding virtual classes on line so our members can have the experience to stay healthy and fit. Please help our Y to be able to respond the the needs of our members and community. Thank You!

Main Street Lending Program Comments

4/16/2020 3:15:00 PM	PIO (Email from Mogler	Mogler	Devin	devin.mogler@gpreinc.com	Green Plains Inc.	<p>These programs should not discriminate against well-run businesses experiencing hardship (e.g., negative EBITDA) before COVID-19 where the outbreak has severely impacted their business leading to further decline in demand as individuals adhere to strict social distancing. Treasury should amend the guidance under these programs as follows: Specific Main Street Program Suggested Changes (Based on Term Sheet Headings):</p> <ol style="list-style-type: none"> <li>1. Eligible Borrowers: Change the qualifying standards to \$5.0 billion for commodity-based firms</li> <li>2. Eligible Loans:             <ol style="list-style-type: none"> <li>a. Make the maximum amount of money available under either program equal (e.g., \$150 million), thereby not preferential to companies that were already levered</li> <li>b. Change the language under the maximum loan (Section 5 of both programs) to read as follows: "Maximum loan size that is the lesser of (i) \$150 million or (ii) 5% of Eligible Borrower's 2019 revenues."</li> <li>c. Eliminate the EBITDA language under MSNLF (Section 5(ii)) and under MNSELF (Section 5(iii)) for those that can provide #</li> </ol> </li> <li>3. Loan Participations:             <ol style="list-style-type: none"> <li>a. Insure non-discriminatory lending by financial institutions to make funds available to all businesses that meet qualifications</li> </ol> </li> <li>4. Required Attestations: Allow for use of proceeds to repay certain debt or otherwise provide for cures under existing lender covenant requirements</li> </ol>
4/16/2020 3:18:00 PM	PIO (Email from Finnerty	Finnerty	Jim	jfinnerty@nrpgroup.com	The NRP Group	<p>I am seeking guidance as to how the various limitations associated with the Main Street Lending Program will be applied to flow through entities. There should be an exception to the limit on capital distributions to allow partnerships to distribute cash to partners to enable the partners to pay the tax liability associated with the income that is allocated to the partners on their Schedule K-1. Not allowing for income tax distributions to cover federal, state and sometimes local tax liabilities will be a hardship on partners who may not be otherwise able to satisfy their tax obligations.</p>
4/16/2020 3:18:00 PM	PIO (Email from Haley	Haley	Jamee	jamee@lowcountrylocalfirst.org	Lowcountry Local First	<p>I am writing as a representative of over 500 small businesses employing more than 13,000 workers to provide feedback on the proposed Main Street Lending Program.</p> <p>Hundreds of business owners in Charleston and across South Carolina are currently unable to pay rent on the storefront their business occupies. A town that sees thousands of visitors each year and has seen lease rates climbing by 26% in one year are now shuddering their doors due to COVID19. We know that a strong economic recovery will be based on how many of these small businesses that we are able to preserve. But in these unprecedented times, tenants can't pay rent, and landlords may find it difficult to make mortgage payments.</p> <p>In cases where the bank providing Main Street Lending funds are also mortgage servicers, the Fed should do more than encourage banks which are mortgage servicers to place consumers in short-term payment forbearance programs --the Fed should require it.</p> <p>In order to maximize employment beyond the now expended PPP, brick and mortar businesses need assurance that they will not be pushed off of the very Main Street for which the bill is named.</p> <p>Whatever the method, the need to prevent the eviction of Main Street businesses that will be the lifeline of recovery should require banks providing federal loans to relieve these mortgages, which are imperative to keep healthy Main Streets everywhere.</p>
4/16/2020 3:18:00 PM	PIO (Email from Talcott	Talcott	Jonathan	jon.talcott@nelsonmullins.com	Nelson Mullins Riley & Scarborough LLP	<p>The economic shutdown related to Covid-19 has been devastating to a number of our clients, who need CARES Act relief. Given their size and the loan amounts they need, the only program available to many is the Expanded Loan Facility (MSELF). However, as currently described in the Term Sheet, several cannot participate in the MSELF because they do not have a term loan outstanding with an eligible lender. They do, however, have other forms of credit, such as lines of credit or credit facilities, with eligible lenders. The term loan qualification to participate in the MSELF unnecessarily restricts the program's ability to assist businesses that are in need during this time of crisis. Letters of credit, credit facilities, credit lines and other forms of lending with an eligible lender should also allow an eligible borrower to borrow under the MSELF. The principles underlying know-your-customer policies and traditional credit evaluation favor higher caps or limitations on available loans to borrowers who have existing relationships with federally insured depository institutions. But, these same principles apply to all types of credit, not just term loans. Therefore, by requiring the existence of a term loan, rather than any other form of credit, the MSELF unnecessarily limits the amount of support that will be given to businesses, a direct contradiction to its stated goal to "enhance support for small and mid-sized businesses" and help "businesses keep their workers on payroll."</p>

Main Street Lending Program Comments

4/16/2020 3:19:00 PM	PIO (Email from	Holmes	Pamela	Personal Email Address	Tri-County CASA, Inc.	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:21:00 PM	PIO (Email from	Davis	Simcha	Personal Email Address	AS220 Youth Studio	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>
4/16/2020 3:21:00 PM	PIO (Email from	Olsen	Erik	eolsen@tbccorp.com	TBC Corporation	<p>We are an American company headquartered in Palm Beach Gardens, Florida, with 9,727 employees based in the U.S. and 982 based internationally. Since 2018, we have been jointly owned by two foreign entities. Under the Main Street Lending Program's proposed eligibility criteria, it is unclear whether our operations outside the U.S. or our foreign parents are included in the analysis of whether we are eligible for a loan under the Program. We would be eligible under the Program if considered as a standalone U.S. entity; however, we would not be eligible under the Program if considered together with our foreign parents and employees.</p> <p>We believe we should be evaluated for a loan under traditional banking underwriting procedures as a standalone U.S. entity. Evaluating our eligibility as a standalone entity would be consistent with long-standing bank underwriting practices and the procedures adopted by the SBA's Paycheck Protection Program. Under the PPP, an applicant's foreign-based employees are not counted against eligibility. Both the Program and PPP were established to help "businesses keep their workers on payroll." The Program was established "to enhance support for small and mid-sized businesses" and businesses may participate in both the Program and PPP. Therefore the Program should adopt a similar rule to broaden the eligibility of prospective domestic companies to achieve its goal.</p>
4/16/2020 3:22:00 PM	PIO (Email from	Finnerty	Jim	jfinnerty@nrpgroup.com	The NRP Group	<p>I am seeking guidance as to how the various limitations associated with the Main Street Lending Program will be applied to flow through entities. Guidance is needed to understand how the compensation limitations will apply to a partner in a partnership. Guaranteed payments for services could reasonably be included in determining compensation paid to a partner. However, for partnerships that do not pay guaranteed payments (and for amounts of partnership income that are in excess of guaranteed payments), it would not be appropriate to treat a partner's share of distributable income as compensation as there is no way to apply a limit to this income allocation under current partnership law.</p>
4/16/2020 3:22:00 PM	PIO (Email from	Haymes	Diane	Personal Email Address	Diane Haymes Photography	<p>I am on the board of Out Front Theatre, a regional 503(c) production company. There is concern that small non profits like ours may be excluded from COVID -19 relief packages. While we are not a large employer, we employ a full time staff and many contract set designers, lighting and production professionals, marketing and PR firms, printers, and actors for our productions. When we were shut down by the City of Atlanta over the virus all of these contract people lost their income from us. We count, the arts matter, please make sure that small non-profits are included in the relief efforts.</p>

Main Street Lending Program Comments

4/16/2020 3:22:00 PM	PIO (Email from	Garrett	Jamila	jrgarre@emory.edu	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and especially HBCUs from the Main Street New &amp; Expanded Loan Facilities. The nonprofit sector is just as critical to economic stability and recovery as for-profit businesses.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. It is also home to the Atlanta University Center where the nation's top-tier HBCU institutions are located.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Thank you for your consideration.</p>
4/16/2020 3:22:00 PM	PIO (Email from	Nawabi	Tom	tnawabi@pratt.edu	<p>Pratt Institute</p> <p>As part of the bipartisan CARES Act, we were thrilled to hear that the Federal Reserve recently announced its new "Main Street" lending facility. Unfortunately, our understanding is that currently as the proposal has been written, the lending facility is excluding nonprofits, many institutions of higher learning and Minority-Serving Institutions. We are a mid-size higher education institution and were in good financial standing prior to the COVID-19 crisis. We are one of the organizations that are also ineligible for the Paycheck Protection Program. As a result of not extending the lending program to all higher education institutions would be a significant blow to our organization and many other higher education institutions across the country.</p>
4/16/2020 3:26:00 PM	PIO (Email from	MacDonald	Kate	Personal Email Address	<p>Citizens Bank</p> <p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>
4/16/2020 3:26:00 PM	PIO (Email from	Zive	Joshua	Joshua.Zive@bracewell.com	<p>Bracewell LLP</p> <p>*Full text of comments submitted via email*</p> <p>The term sheet for the Main Street Lending Programs (MSLP) states that "The Eligible Borrower must attest that it will follow capital distribution restrictions that apply to direct loan program under section 4003(c)(3)(A)(ii) of the CARES Act."</p> <p>This language is designed to prevent corporate entities from returning loan proceeds to stockholders through dividends. However, the language can be construed as prohibiting all cash distributions by eligible borrowers, including distributions made by partnerships.</p> <p>Partnership entities, including master limited partnerships (MLPs), operate differently than corporations and must be able to make regular distributions as an inherent component of their unique business model. This model allows MLPs to attract the dollars needed to provide our nation's critical energy infrastructure. Prohibiting such distributions would be incompatible with the operation of these partnerships, and would preclude MLPs from utilizing the MSLP, unnecessarily restricting access to the MSLP from a crucial sector of our economy and nation's energy infrastructure.</p> <p>The Federal Reserve should provide guidance making it clear that MSLP dividend restrictions, including the term sheet language related to "other capital distributions," do not prohibit partnerships from making regular cash distributions in the ordinary course of business.</p>

Main Street Lending Program Comments

4/16/2020 3:27:00 PM	PIO (Email from	White	Eugene	Personal Email Address		<p>I am writing to oppose the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities.</p> <p>The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.&amp;#160;</p> <p>As large employers alone, they deserve federal support - but they also: Supply critical services at a scale that would be impossible to replace; Support an array of small businesses; and Serve as economic anchors for their communities.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation&amp;#39;s recovery from this unprecedented crisis depends on the success of our nation&amp;#39;s nonprofits.</p>
4/16/2020 3:28:00 PM	PIO (Email from	Clark	Taylor	taylor@revbir mingham.org	REV Birmingham	<p>As a nonprofit with a mission of creating vibrant commercial districts, small businesses are the fabric of our community and the core focus of our technical assistance efforts. Approximately 35.7 million Americans employed by small businesses appear to be at risk of unemployment. Beyond low-interest loans, business owners primarily need financial assistance and penalty-free extensions on expenses.</p> <p>It is imperative that the Main Street Lending Program account for two things: the dire need for terms that allow our small business community to fully rebound and to allow nonprofits - particularly those supporting small, lifestyle businesses - to be included in these provisions.</p> <p>The stimulus package provided loan forbearance for SBA loans, which is a great first step, but we must ensure that small businesses with other forms of debt are supported. Please consider allowing nonprofits the opportunity to receive funding under this legislation as a boots-on-the-ground resource to advocate for and implement policies and programs to help our small business community rebound. Furthermore, implement provisions that extend beyond favorable loan terms and earmark a portion as forgivable as our small business desperately need financial assistance that will not further impact their bottom line through the accrual of more debt.</p>
4/16/2020 3:28:00 PM	PIO (Email from	Silvestri	Nick	Personal Email Address	Out Front Theatre company	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation&amp;#39;s recovery from this unprecedented crisis depends on the success of our nation&amp;#39;s nonprofits.</p>
4/16/2020 3:28:00 PM	PIO (Email from	Heston	Greg	gregory.heston@ey.com	EY	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation&amp;#39;s recovery from this unprecedented crisis depends on the success of our nation&amp;#39;s nonprofits.</p>



Main Street Lending Program Comments

4/16/2020 3:28:00 PM	PIO (Email from	Watson	Stephanie	stephanie.watson@pobox.com	Building Connections, LLS	<p>We are writing with STRONG opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. People and communities now more than ever are needing non-profits to help meet basic needs for food, shelter, healthcare, safety, and mental health and well-being issues. Nonprofits are meeting the needs of those most vulnerable in communities across GA. They are pivoting with the times, as they always do, to ensure those least able to protect themselves have the means to do so. They MUST be included in new legislation or regulations that address and bolster GA's businesses - as they ARE businesses. Georgia nonprofits have hundreds of staff each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:29:00 PM	PIO (Email from	Curtis	Philip	PCurtis@apla.org	APLA Health	<p>APLA Health is deeply concerned to learn that nonprofits are ineligible for the Federal Reserve's new "Main Street" lending facility, despite the fact that nonprofits are leading the effort to respond to this pandemic. APLA Health is a federally qualified health center, with a focus on LGBT and other low-income marginalized populations, and people living with and at risk for HIV. All the populations APLA Health serves are disproportionately impacted by COVID-19. Our clinics continue to see all who present at our doors, including when appropriate patients presenting with suspected COVID-19 symptoms. However, our revenues are currently diminished by fewer patient visits during the COVID crisis. Nonprofits like ours need access to these government backed revenue streams and loan programs. This is a particularly devastating blow for larger nonprofits who are currently ineligible for the Paycheck Protection Program. Given the current financial crisis and loss of revenue, nonprofits may be forced to shrink their services or even close, meaning tens of thousands could go without care. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.</p>
4/16/2020 3:32:00 PM	PIO (Email from	Jordan	Scott	scott.jordan@uconn.edu	University of Connecticut	<p>I'd like to offer my support of the American Council of Education's (ACE's) comments sent to you on April 16, 2020 regarding the MSNLF.</p> <p>I applaud the Federal Reserve's efforts in establishing the MSNLF to enhance support for small and mid-sized businesses affected by the COVID-19 pandemic, but I think public universities should have access to MSNLF loans should we need them. Our states are not able to absorb one-time losses that could exceed \$100 million per university.</p> <p>First, UConn has a \$1.3 billion annual operating budget, two-thirds of which we generate ourselves through tuition, fees, and our business auxiliaries (e.g., housing, dining, parking, sporting events, etc.). Our state contributes about a third of our revenues. Thus, we effectively operate as a mid-size business delivering educational and research and development services.</p> <p>Second, if social distancing runs into the fall semester of 2020, it could lead to a \$74 million loss in tuition revenues from international and out-of-state students alone, and \$58 million in lost housing and dining revenues. Access to short-term lending at favorable rates would help us bridge the gap between normal operations.</p> <p>Finally, our 31,000 students rely strongly on our ability to sustain our academic, research, and public service operations that helps them begin their careers. Access to MSNLF loans will help us continue and complete their college experience on-time. Thank you for your leadership during this unprecedented time.</p>
4/16/2020 3:33:00 PM	PIO (Email from	Mitchell	Jamie	jamie@rallyfoundation.org	Rally Foundation	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 3:33:00 PM	PIO (Email from	Bowden	Karla	bowdenk@fc care.org	Friendship Community Care	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;          Payments shall not be due until two years after a direct loan is made;          Employee retention provisions should begin on the date that loan funding is received by the borrower; and          In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 3:36:00 PM	PIO (Email from	Quick	Jeanette	legal@gusto.com		<p>We ask the Fed to address two issues:          Provide clarification that exec comp does not include vesting or exercise of previously granted stock options, particularly when those stock options may be illiquid or the fair market value may be based on a prior valuation that has likely dropped as a result of COVID, cannot be valued easily at the time of vesting, and cannot be disposed of or sold. If stock or options are included, this would disadvantage private companies whose founders often receive substantial stock in trade off for many years at low salaries while the company is built. Private companies need this facility to continue to meet the needs of customers, but would not be able to meet the compensation change cap if stock that vests over the subsequent 12 months is counted as compensation. We ask that you include only cash compensation and liquid stock in the definition of exec comp and not include any periodic vesting of previously granted stock as an &amp;quot;increase&amp;quot; in total compensation. The maximum loan amounts in the term sheet are based on an EBITDA multiplier. However, many early-stage companies that provide valuable services to small businesses have a negative EBITDA, and would be ineligible even though they regularly verify solvency with lenders, investors, and counterparties using other metrics. We suggest the Fed evaluate companies&amp;#39; needs based on a percentage of valuation or commonly accepted debt/equity metrics on a per industry basis.</p>
4/16/2020 3:36:00 PM	PIO (Email from	Mitchell	Carrie	Personal Email Address	The Humane Society of Statesboro and Bulloch County	<p>I do not think non profits should be excluded from this lending program. I volunteer with the Humane Society of Statesboro and Bulloch County. Non profits serve a vital function in the United States and it is important to keep them strong.</p>
4/16/2020 3:37:00 PM	PIO (Email from	Arline	Helen	Personal Email Address	South Georgia Ballet	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation&amp;#39;s recovery from this unprecedented crisis depends on the success of our nation&amp;#39;s nonprofits. I have been employed by a non-profit and now serve on the board of this same non-profit and have personally seen the positive impact it has had on our small community. We are blessed with several non-profits in our small town and each one contributes immeasurably to this community. Thank you</p>
4/16/2020 3:37:00 PM	PIO (Email from	Aker	Anthony	Personal Email Address		<p>Please include nonprofits in any additional funding made available through the PPP.</p> <p>Best, Anthony</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 3:37:00 PM	PIO (Email from	Coolidge	Aimee	aimee.coolidge@pinestreetinn.org	Pine Street Inn	<p>As a nonprofit in Massachusetts that shelters and houses homeless men and women, we urge you to ensure that the Main Street Lending Program and any subsequent mid-size loan programs are fully available to nonprofits, including those with 500 employees or more.</p> <p>The CARES Act made two loan programs (EIDL, PPP) available to nonprofits with 500 employees or fewer. Those provide important relief but they are not available to nonprofits that employ more than 500 people. This is a significant barrier to relief for nonprofit institutions, such as ours, with large workforces administering critical programs and services.</p> <p>As Treasury and the Fed work to implement &amp;#167;4003(c)(3)(D), providing financing to lenders to make loans to nonprofits and other employers with up to 10,000 employees, we urge you to:</p> <p>Include an interest rate of 0.50% (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization;          Provide priority to 501(c)(3) charitable nonprofits and require lenders to make a proportionate number and value of loans to nonprofits to prevent the crowding out that is being seen in the Paycheck Protection Program;          Set a date certain for when employee retention provisions should begin; and          Set forth that payments shall not be due until two years after a direct loan is made.</p> <p>Thank you for your consideration.</p>
4/16/2020 3:37:00 PM	PIO (Email from	Schneider	Brett	brett.schneider@madisonelectric.com		<p>Regarding The Main Street Loan Facility. Point #5, the term &amp;quot;undrawn debt&amp;quot; should be eliminated. In the wholesale industry, this term would make many companies ineligible.</p> <p>Thank you</p>
4/16/2020 3:38:00 PM	PIO (Email from	Reeves	Sara	reevess@fccare.org	Friendship Community Care, Inc.	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;          Payments shall not be due until two years after a direct loan is made;          Employee retention provisions should begin on the date that loan funding is received by the borrower; and          In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 3:38:00 PM	PIO (Email from	Brown	Marcia	brownm@fccare.org	Friendship Community Care, Inc.	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;          Payments shall not be due until two years after a direct loan is made;          Employee retention provisions should begin on the date that loan funding is received by the borrower; and          In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 3:39:00 PM	PIO (Email from	Tackett	Caitlin	tackettc@fccare.org	Friendship Community Care	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;          Payments shall not be due until two years after a direct loan is made;          Employee retention provisions should begin on the date that loan funding is received by the borrower; and          In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>

Main Street Lending Program Comments

4/16/2020 3:39:00 PM	PIO (Email from Holzberg	Mark	mark@theHolzbergs.com	Gateway Center for Homeless	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:39:00 PM	PIO (Email from Goodman	Amy	goodmana@fccare.org		<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> </ul> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 12:00:00 AM	PIO (Email from popper	kirstin	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits from from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:42:00 PM	PIO (Email from Schaubroeck	Antonia	schaubroeck a@fccare.org	Friendship Community Care, Inc	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> </ul> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 3:43:00 PM	PIO (Email from Regan	Teresa	Personal Email Address		<p>In support of the 4,000 employees of a regional non-profit health and human services agency that provides programs and services to nearly 10,000 people with intellectual and developmental disabilities, special needs, their families and older adults throughout numerous counties in Western New York and the Greater Rochester region, I am writing today to inform you that People Inc. is fully engaged in dealing with the COVID-19 crisis. They must ensure that more than 150 community-based homes and services for people with disabilities remain as safe as possible and are staffed 24/7. The vulnerable people that depend on People Inc. deserve no less. However, because they are providing essential services during the crisis, People Inc. has incurred highly unusual increased costs in staffing, PPE, and cleaning services.</p> <p>Since People Inc. is not eligible for the Payroll Protection Program (PPP) due to their size and the fact that they must remain fully operational, we request that the Mid-Size Loan Program have provisions to convert to a forgivable loan for nonprofits that face staggering losses due to COVID-19. This would grant them the same protections as PPP.</p>
4/16/2020 12:00:00 AM	PIO (Email from Bogard	Jerry	Personal Email Address	Bogard Agricultural Consultancy Group inc	<p>My Company is interested in participating in the Main Street Lending Program. We own a significant dollar amount of mortgage backed property that seems to fit this program. We provide Groundwater Preservation relief for a large area designated as a critical Groundwater Depletion area and need help.</p>

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Main Street Lending Program Comments

4/16/2020 12:00:00 AM	PIO (Email from	Ybarra	Ricardo	rybarra@asc entfoods.com	Ascent Foods, LLC	We are finding that banks still do not have any information about this Main Street Loan Program. Would you please advise which banks will be eligible on this program?
4/16/2020 3:44:00 PM	PIO (Email from	Miller	Amy	millera@fccar e.org	Friendship Community Care, Inc.	As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:  -Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization; -Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; -Payments shall not be due until two years after a direct loan is made; -Employee retention provisions should begin on the date that loan funding is received by the borrower; and -In implementing any workforce restoration and retention provisions, &quot;workforce&quot; should be defined as full-time employees or full-time equivalents.
4/16/2020 3:45:00 PM	PIO (Email from	Cressler	Maria	mccressler@ig natiushouse. org	Ignatius House	I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 3:45:00 PM	PIO (Email from	Coarse	Kimberly	Personal Email Address		MAINSTREET LENDING- Please ensure that nonprofit employers with between 500 and 10,000 employees are able to access the loan. The YMCA and it's staff was instrumental in finding fellowship and physical fitness within our community when my son was just starting out with sports and I was beginning my fitness journey. Excluding such an organization due to the higher amount of employees doesn't seem right because they have the ability to utilize those employees to positively impact so many more lives!
4/16/2020 3:45:00 PM	PIO (Email from	Caldwell	Connie	caldwellc@fc care.org	Friendship Community Care, Inc.	As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program: Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization; Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; Payments shall not be due until two years after a direct loan is made; Employee retention provisions should begin on the date that loan funding is received by the borrower; and In implementing any workforce restoration and retention provisions, &quot;workforce&quot; should be defined as full-time employees or full-time equivalents.
4/16/2020 3:46:00 PM	PIO (Email from	Philpot	Renee	philpotr@fcca re.org	Friendship Community Care	As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:  Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization; Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; Payments shall not be due until two years after a direct loan is made; Employee retention provisions should begin on the date that loan funding is received by the borrower; and In implementing any workforce restoration and retention provisions, &quot;workforce&quot; should be defined as full-time employees or full-time equivalents.

Main Street Lending Program Comments

4/16/2020 3:46:00 PM	PIO (Email from	Tefelski	Karen	ktefelski@vaaccses.org	vaACCSES	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;          Payments shall not be due until two years after a direct loan is made;          Employee retention provisions should begin on the date that loan funding is received by the borrower; and          In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p> <p>As you have shared with us, many nonprofits employ more than 500 employees and have not been able to access the Paycheck Protection Program, which contains loan forgiveness provisions that are critical to these organizations, and necessary to help ensure they will be able to continue to provide services during the crisis and assist with our nation's recovery efforts when the crisis is over.</p>
4/16/2020 3:46:00 PM	PIO (Email from	Thompson	Virginia	info@aysc.org	Atlanta Young Singers	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:50:00 PM	PIO (Email from	Burkhardt	Craig	cburkhardt@btlaw.com	Barnes & Thornburg LLP	<p>The operations and finances of 501(c)(3) charitable nonprofits are particularly stressed and such organizations do not have the same capability to ramp-up revenue generation as quickly as business organizations. We therefore recommend enhanced loan terms for such nonprofits as long as they are capable of submitting credit-worthy applications. Such terms should include a 0.50% interest rate for a 5-year term and with a 20-year amortization.</p> <p>Among 501(c)(3) charitable nonprofits, priority should be provided to applicants certifying that they are directly engaged in providing COVID-19 relief. Such priority should include the following practices.</p> <ul style="list-style-type: none"> <li>oSuch applications should be considered before other nonprofit applications.</li> <li>oSuch applications should be prioritized for maximum feasible funding. If there is insufficient funding to grant all nonprofit loans in the full amounts applied-for, applicants of charitable nonprofits providing COVID-19 relief should receive a higher percentage of funds applied-for than those nonprofits not providing COVID-19 relief.</li> </ul> <p>Payments on loans made to 501(c)(3) charitable nonprofits should not be due until two years after a direct loan is received.</p> <p>To distinguish between sets of loans and to reserve funds for social service organizations to apply to, we suggest a set aside of funds within the MSBLP.</p>
4/16/2020 3:51:00 PM	PIO (Email from	Sweet	Andry	andry.sweet@chsfl.org	Children's Home Society of Florida	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D) to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization          Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts          Payments shall not be due until two years after a direct loan is made          Employee retention provisions should begin on the date that loan funding is received by the borrower          In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents</p> <p>Many nonprofits employ more than 500 employees and have not been able to access the Paycheck Protection Program, which contains loan forgiveness provisions which are critical to these organizations and necessary to help ensure they will be able to continue to provide services during the crisis and assist with our nation's recovery efforts when the crisis is over.</p> <p>Charitable nonprofits play the third largest employer in our nation's economy. The recommendations above will help to keep non-profits financially strong and allow them to continue to meet the immediate needs of their communities.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 3:51:00 PM	PIO (Email from	Basile	Catherine	Personal Email Address	AS220	Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.
4/16/2020 3:51:00 PM	PIO (Email from	AbuSitta	Mary	Personal Email Address		In support of the 4,000 employees of a regional non-profit health and human services agency that provides programs and services to nearly 10,000 people with intellectual and developmental disabilities, special needs, their families and older adults throughout numerous counties in Western New York and the Greater Rochester region, I am writing today to inform you that People Inc. is fully engaged in dealing with the COVID-19 crisis. They must ensure that more than 150 community-based homes and services for people with disabilities remain as safe as possible and are staffed 24/7. The vulnerable people that depend on People Inc. deserve no less. However, because they are providing essential services during the crisis, People Inc. has incurred highly unusual increased costs in staffing, PPE, and cleaning services.  Since People Inc. is not eligible for the Payroll Protection Program (PPP) due to their size and the fact that they must remain fully operational, we request that the Mid-Size Loan Program have provisions to convert to a forgivable loan for nonprofits that face staggering losses due to COVID-19. This would grant them the same protections as PPP.  Thank you in advance for your support of direct care staff, the people they support and People Inc.
4/16/2020 3:54:00 PM	PIO (Email from	Bremis	Janice	janice@edrsv.org	Eating Disorders Resource Center	Please extend this legislation to include non-profits
4/16/2020 3:54:00 PM	PIO (Email from	Regan	Darcy	Personal Email Address		In support of the 4,000 employees of a regional non-profit health and human services agency that provides programs and services to nearly 10,000 people with intellectual and developmental disabilities, special needs, their families and older adults throughout numerous counties in Western New York and the Greater Rochester region, I am writing today to inform you that People Inc. is fully engaged in dealing with the COVID-19 crisis. They must ensure that more than 150 community-based homes and services for people with disabilities remain as safe as possible and are staffed 24/7. The vulnerable people that depend on People Inc. deserve no less. However, because they are providing essential services during the crisis, People Inc. has incurred highly unusual increased costs in staffing, PPE, and cleaning services.  Since People Inc. is not eligible for the Payroll Protection Program (PPP) due to their size and the fact that they must remain fully operational, we request that the Mid-Size Loan Program have provisions to convert to a forgivable loan for nonprofits that face staggering losses due to COVID-19. This would grant them the same protections as PPP.  Thank you in advance for your support of direct care staff, the people they support and People Inc.
4/16/2020 3:56:00 PM	PIO (Email from	Lawrence	Tewan	tlawrence@hopeandhealing.org	Children's Center for Hope and Healing	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available. Furthermore, my organization provides trauma counseling to an underserved and often overlooked population, both children and minorities. Also, we provide services to youth offenders in hopes to prevent future reoffending behavior. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits. Thank you for taking time to consider the contributions of all non-profits and their importance in the community.

Main Street Lending Program Comments

4/16/2020 3:57:00 PM	PIO (Email from	Regan	Mary	Personal Email Address		<p>In support of the 4,000 employees of a regional non-profit health and human services agency that provides programs and services to nearly 10,000 people with intellectual and developmental disabilities, special needs, their families and older adults throughout numerous counties in Western New York and the Greater Rochester region, I am writing today to inform you that People Inc. is fully engaged in dealing with the COVID-19 crisis. They must ensure that more than 150 community-based homes and services for people with disabilities remain as safe as possible and are staffed 24/7. The vulnerable people that depend on People Inc. deserve no less. However, because they are providing essential services during the crisis, People Inc. has incurred highly unusual increased costs in staffing, PPE, and cleaning services.</p> <p>Since People Inc. is not eligible for the Payroll Protection Program (PPP) due to their size and the fact that they must remain fully operational, we request that the Mid-Size Loan Program have provisions to convert to a forgivable loan for nonprofits that face staggering losses due to COVID-19. This would grant them the same protections as PPP.</p> <p>Thank you in advance for your support of direct care staff, the people they support and People Inc.</p>
4/16/2020 3:58:00 PM	PIO (Email from	Samuel	Sophia	sophia.samuel@ddiny.org	Developmental Disabilities Insitute, Inc.	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> </ul> <p>In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 3:58:00 PM	PIO (Email from	Howland	David	dhowland@kipmetroatlanta.org	KIPP Metro Atlanta Schools	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 3:59:00 PM	PIO (Email from	Diaz	Naya	naya@ywcaoustin.org		<p>I urge you to INCLUDE non-profits that serve in the social services sector in the current Main Street Covid-19 relief package. These organizations are the lifeblood of the communities they serve providing essential services to the most vulnerable people in a community. Additionally, these non-profits, such as the over 200 affiliates of the YWCA USA are in turn employers in the markets they operate in. These organizations, by mandate of their non-profit status and their oversight governance are the MOST efficiently run organizations that perennially DO THE MOST with the operating dollars they have. To EXCLUDE these essential organizations is a grave misstep at a time when they are MOST needed by the communities they serve.</p>
4/16/2020 3:59:00 PM	PIO (Email from	LaPointe	Andrea	Lapointea@fcare.org	Friendship Community Care	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> </ul> <p>In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>



Main Street Lending Program Comments

4/16/2020 4:00:00 PM	PIO (Email from	Wang	Wendy	wwang@hscfs.org	Hathaway Sycamores	I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses. We request that the program include: a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization; Prioritize 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; Payments should not be due until two years after a loan is made; Employee retention provisions should begin on the date that loan funding is received by the borrower. Many non-profit organizations are not able to access the Paycheck Protection Program, which is critical to ensure the continued provision of essential services during this crisis. Without increased access to loan programs intended to sustain payroll and retain employees, these mid-sized non-profit organizations are at financial risk, a circumstance that could leave thousands of individuals without timely access to needed care. This lack of access to care will lead many Americans to utilize more emergency services, over-crowding community hospital emergency departments. This will drive up health care costs at a time when the health system is already strained caring for COVID-19 patients
4/16/2020 4:00:00 PM	PIO (Email from	Hopkins	Karen	khopkins@hscfs.org	Hathaway-Sycamores Child and Family Services	I am affiliated with a non-profit organization that provides behavioral health, child welfare services and housing support to individuals in California. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following: <ul style="list-style-type: none"> <li>oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>oPayments should not be due until two years after a direct loan is made</li> <li>oEmployee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>oIn any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents</li> </ul> <p>Many non-profit organizations are not able to access the Paycheck Protection Program , which is critical to ensure the continued provision of essential services during this crisis. Without increased access to loan programs intended to sustain payroll and retain employees, these mid-sized non-profit organizations are at financial risk, a circumstance that could leave thousands of individuals without timely access to needed care.</p>
4/16/2020 4:01:00 PM	PIO (Email from	Treat	Lucinda	lucinda.treat@vice.com	Vice Group Holding, Inc.	The Main Street Lending Program's (MSLP) reliance on EBITDA as the only financial metric to determine eligibility and loan size operates to exclude employers of millions of people in the life sciences, technology, media, start-ups and high-growth industries. Companies in industries such as these are focused on rapid growth or product development and frequently do not have annual EBITDA as they typically reinvest revenue into employees and other human capital, R&D, product development and customer/product acquisition efforts.  <p>To open up the MSLP to a wider range of companies, Eligible Lenders should be authorized to apply EBITDA add-backs for growth-oriented companies on a case-by-case basis. These adjustments to EBITDA could include: 1) human capital costs, including payroll costs to the extent they are intended to grow the business, 2) R&amp;D/software/technology costs that do not fulfill requirements to be capitalized but are necessary in these industries, such as human capital costs which decrease EBITDA, 3) production and development costs, content amortization costs and human capital costs related to building IP libraries, 4) goodwill impairments resulting from the economic downturn, and 5) share-based compensation expense, non-cash expenses and one-time or non-recurring cash expenses. Alternatively, Eligible Lenders could use revenue-based tests for companies with a proven revenue-track record, but whose liquidity is suffering from the pandemic crisis.</p>
4/16/2020 4:02:00 PM	PIO (Email from	Marron	Jennifer	jmarron@interaction.org	InterAction	On behalf of over 200 members and partners, InterAction requests that non-profits be included in the Main Street Lending Program. As the largest alliance of U.S.-based NGOs that implement and advocate for U.S. humanitarian, health, development, and democracy programs, we know that nonprofits need access to this vital economic relief in order to keep staff employed and operations running - including operations that are directly responding to the impacts of covid-19 at home and overseas. As nonprofits, we seek the funding as grants or at the lowest possible interest rate. The nonprofit sector - the third largest workforce in our nation that contributes over five percent to the national GDP - is especially vulnerable because of what we expect to be precipitous declines in charitable giving and earned revenues as a result of the COVID-19 pandemic. We are, therefore, extraordinarily dependent upon equitable access to the financial assistance provisions of the CARES Act.

Main Street Lending Program Comments

4/16/2020 4:03:00 PM	PIO (Email from	Sanik	Lorraine	lsanik@thomchild.org	Thom Child & Family Services	<p>I am a Program Director in a non-profit agency with a 100 year history of helping families in Massachusetts. I have been an Early Intervention Director for 42 years serving thousands of children with disabilities, many living in homeless shelters, many babies born prematurely and numerous other conditions. Services are provided by nurses, physical and speech therapists, special educators and social workers. Because there are more than 10 such programs in our agency there are more than 500 employees. We do not have support for sick leave, paycheck protection, and forgivable loans. We are held to different criteria for the employee retention credit. We are left out of the economic stimulus that is essential for our organization's survival.</p> <p>The lack of cash flow to our agency, and others like ours, is leading to job loss. Without revenue from service delivery, we cannot pay staff. The longer term impact is that families and our service sector will suffer for decades. Across the country, programs like ours are closing, furloughing staff, and stopping services to children who need our help.</p> <p>With access to favorable lending terms and with the same stimulus funding that was offered to smaller non-profits, we can continue to employ our staff of skilled specialists. We can continue to support children and families. We need immediate action. Non-profit agencies of our size must be included in the Main Street Lending Program and any subsequent mid-size loan programs</p>
4/16/2020 4:05:00 PM	PIO (Email from	ODonnell	Scott	scott.odonnell@liquidityservices.com	Liquidity Services	<p>How will EBITDA be calculated for purposes of determining the maximum loan amount?</p> <p>If a company has negative EBITDA for the 2019 year, will it be ineligible for a loan?</p>
4/16/2020 4:05:00 PM	PIO (Email from	Friedman	Royceann	Personal Email Address		<p>I am writing in opposition to the exclusion of nonprofits from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 4:05:00 PM	PIO (Email from	Hamlyn	Bri	bri@ywcausaustin.org	YWCA Greater Austin	<p>I urge you to INCLUDE non-profits that serve in the social services sector in the current Main Street Covid-19 relief package. These organizations are the lifeblood of the communities they serve providing essential services to the most vulnerable people in a community. Additionally, these non-profits, such as the over 200 affiliates of the YWCA USA are in turn employers in the markets they operate in. These organizations, by mandate of their non-profit status and their oversight governance are the MOST efficiently run organizations that perennially DO THE MOST with the operating dollars they have. To EXCLUDE these essential organizations is a grave misstep at a time when they are MOST needed by the communities they serve.</p>
4/16/2020 4:05:00 PM	PIO (Email from	Patel	Rakesh	rakeshp@nhcare.org	Neighborhood Healthcare	<p>I run a FQHC that has over 500 employees. We were excluded from the Payroll Protection Loan and now are excluded from this program because we are a non-profit. We have already been forced to make significant changes to mitigate on-going losses. We play a critical role in providing health care to un/under insured population. Furthermore, we have been instrumental in reducing ER usage by providing the care our patients need in a manner which works for them. We ask that large health centers be allowed to participate in this program given our exclusion from the other programs to date.</p>
4/16/2020 4:05:00 PM	PIO (Email from	Cooner	Jason	jcooner@theitmo.com	The ITMO, Inc.	<p>Hello, I have two businesses that were in good standing at the end of 2019, and am Confidential Business Information I wasn't able to participate in the PPP program, so your new MSNLF is the only option I have to get my businesses back up and running. I contacted the bank I have a business relationship with, Regions Bank, and they have no idea on how to assist or even if they will be participating in the MSNLF. Can you please have someone assist me in applying for and successfully participating in your new loan program for my two businesses? I am afraid I won't receive any assistance from my bank, and the SBA hasn't been of any assistance either. I really need your assistance as I can't find anyone else that has any idea on how to help. Please advise.</p> <p>Thanks for any assistance, Jason</p>
4/16/2020 4:05:00 PM	PIO (Email from	Johnson	Ronald	Personal Email Address	New Horizon Ministries	<p>We are against the Federal Government excluding Non-profit from the lending program</p>

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4/16/2020 4:06:00 PM	PIO (Email from	Stephenson	John	jwstephenson@jbcf.org	J. Bulow Campbell Foundation	<p>We write in opposition to the exclusion of nonprofit organizations and institutes of higher learning from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical, if not more so, to economic stability and recovery as for-profit business. Georgia is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers they should qualify for federal support - they supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 4:08:00 PM	PIO (Email from	Meyer Fertal	Lisa	lisamf@eed-a.org	EEDA	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</p> <p>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</p> <p>Payments shall not be due until two years after a direct loan is made;</p> <p>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</p> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 4:08:00 PM	PIO (Email from	McGowan	Mary Beth	mmcgowan@dykema.com	International Cemetery, Cremation and Funeral Association	<p>The International Cemetery, Cremation and Funeral Association urges the Fed to include entities registered as tax-exempt under 501(c)(13), which applies solely to not for profit cemeteries, as eligible borrowers under the Main Street Lending Program. The Paycheck Protection Program excludes 501(c)(13)s, preventing nearly 10,000 cemeteries, according to the most recent IRS data, from accessing that program. Some cemeteries are structured as 501(c)(3)s or for-profit businesses so are eligible for the PPP. This has caused a disparity in the industry among those receiving financial assistance. Cemeteries, typically small businesses, have been adversely impacted by the COVID- 19 crisis since most states have limited burials to only immediate family. Cemeteries are being forced to cut back on staffing because of the limited services they are providing under social distancing orders. Family counselors are not meeting with families, which produces lower sales, forcing many cemeteries to lay off or furlough numerous dedicated employees because of the lower revenue. ICCFA requests that as the Fed and Treasury finalize the Program infrastructure they consider allowing cemeteries registered as 501(c)(13) organizations to be included as eligible borrowers. Founded in 1887, ICCFA has over 9,300 members, primarily in the United States, representing non-profit, religious and municipal cemeteries, funeral homes, crematories, monument builders, for-profit cemeteries and third-party retailers.</p>
4/16/2020 4:08:00 PM	PIO (Email from	Verner	Betsy	bverner@fraserparkerfoundation.org	Fraser-Parker Foundation	<p>We write in opposition to the exclusion of nonprofit organizations and institutes of higher learning from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical, if not more so, to economic stability and recovery as for-profit business. Georgia is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers they should qualify for federal support - they supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 4:08:00 PM	PIO (Email from	Sullivan	John	jsullivan@dispatchtrans.com	Dispatch Transportation	<p>CONTEXT: Dispatch is a profitable, modestly-leveraged construction services operating company, organized as a passthrough entity.</p> <p>1)TAX DISTRIBUTIONS PERMISSIBLE: Please confirm that to the extent tax distributions (A) are set forth prior to April 8, 2020 (unless they are for newly formed entities) in governing documents (e.g., LLC Operating Agreements) and (B) not prohibited under any credit agreements, they shall be permissible for passthrough entities (i.e., they are not otherwise restricted by the "no dividends" rule.) Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers, like Dispatch, organized as pass-through entities.</p> <p>2)ADJUST FOR SEASONAL FLUCTUATIONS IN DEBT: For the purpose of calculating debt in seasonal businesses (such as in retail and construction industries), please allow for factoring in the timing of the loan application within the calendar year. We propose an alternative calculation of "debt" in such seasonal businesses affected by consumer/retail, weather, construction, etc. Namely, replace the debt calculation with the:</p> <ul style="list-style-type: none"> <li>(i) average debt balance over the last 12 month ends +/-</li> <li>(ii) the change in the applicant's net working capital the borrower vs 12 months prior to the application date.</li> </ul> <p>This would prevent distortions where leverage ratios may vary dramatically depending on whether an application is filed in May vs. in September.</p>

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4/16/2020 4:10:00 PM	PIO (Email from	Martin	Robert	rmartin@stablesidecapital.com		I applaud your efforts to establish the Main Street Lending Program and would like to advocate the Main Street New Loan Facility allow for loan proceeds to fund mergers and acquisitions of small and medium-sized businesses. Permitting the use of the MSNLF for mergers and acquisitions would provide immediate and sustained assistance to business owners who are seeking strategic paths to continue the next chapter of their business and provide on-going employment to their workforce. Similarly, qualified business purchasers would be provided access to capital markets that are currently operating at less than ideal conditions due to the COVID-19 impact. Thank you for your consideration.
4/16/2020 4:10:00 PM	PIO (Email from	Jarrard	Beth	bjarrard@jbcf.org	Georgia Health Foundation	We write in opposition to the exclusion of nonprofit organizations and institutes of higher learning from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical, if not more so, to economic stability and recovery as for-profit business. Georgia is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts. As large employers they should qualify for federal support - they supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 4:11:00 PM	PIO (Email from	Hoopes	Nathaniel L.	nat.hoopes@marketplacelendingassociation.org	Marketplace Lending Association	The 35 members of the MLA applaud the Main Street Lending Program to support mid-sized companies during the Covid-19 pandemic. These programs can provide relief for our members, but to do so, the following terms should be clarified: The Main Street Extended Loan Facility (MSELF) loan size test in 5(ii) is designed so borrowers do not take on more than 30% in additional debt. The test in 5(iii) of the MSELF and 5(ii) of the Main Street New Loan Facility should make clear that "bank debt" as defined in these tests should permit, at the borrower's election, inclusion of all lending facilities, including asset-based warehouse facilities, and should be consistently applied to the calculations in 5(ii) and 5(iii). Our members often have existing bank loan facilities, including revolving and warehouse facilities, that are integral to financing their businesses and they may have drawn these facilities in anticipation of the pandemic's impacts and to house loans while access to capital markets is limited. The ability to extend or refinance these facilities is constrained at this time. Without relief from the Main Street Lending Program, our members may need to take more severe actions that will further restrict consumer lending in order to repay bank debts when due. If the above clarification is made, eligible MLA members will be able to utilize the Main Street facilities and keep credit flowing to consumers and small businesses.
4/16/2020 4:11:00 PM	PIO (Email from	Veale	Ward	Wardgv@sbcglobal.net	Veale Companies	Please declare that oil and gas have been severely affected by the pandemic. The payback terms could be made more helpful by increasing the no debt service period from a year and lengthening the term from 4 years.
4/16/2020 4:11:00 PM	PIO (Email from	Burke	Patricia	Personal Email Address	The RCF Group	As an active Association Board member with the YMCA of Greater Louisville, I ask that you ensure nonprofits are explicitly named as eligible recipients of the Main Street Lending program. It is critical that nonprofit employers with between 500 and 10,000 employees are able to access the loan. The YMCA of Greater Louisville employed 2100 staff prior to the COVID-19 pandemic and have had to furlough 95% of our staff. Without access to support, our Y will not be able to resume operations as we knew it or retain our staff. Closure of Y facilities and the suspension of programs has created a serious impact on finances and services, reducing revenues by \$3 - \$3.5 million per month. Despite our facilities being closed, our Y is providing child care for Health, Emergency and other essential services as outlined by the Governor's Office; Teen Shelter for homeless and neglected/abused youth; Shelter for homeless men; Making hundreds of welfare calls; Offering thousands of virtual experiences for activity, engagement, and connectedness. I am depending on you to ensure that we have the resources necessary to support our neighbors and our staff. Thank you. Stay healthy in these unusual times.

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4/16/2020 4:12:00 PM	PIO (Email from	Kirtz	Harold /	Personal Email Address	Jewish Community Relations Council of Atlanta	<p>I am writing to oppose the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities program. The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>For example, Georgia is home to over 300 nonprofit organizations with 500 or more staff members. All of them are doing vital work during this unprecedented time. Please do leave them behind in this relief effort.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace. They support an array of small businesses and serve as economic anchors for their communities.</p> <p>We urge the Federal Reserve to make all nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 4:13:00 PM	PIO (Email from	nicoll	heather	Personal Email Address		<p>I urge you to INCLUDE non-profits that serve in the social services sector in the current Main Street Covid-19 relief package. These organizations are the lifeblood of the communities they serve providing essential services to the most vulnerable people in a community. Additionally, these non-profits, such as the over 200 affiliates of the YWCA USA are in turn employers in the markets they operate in. These organizations, by mandate of their non-profit status and their oversight governance are the MOST efficiently run organizations that perennially DO THE MOST with the operating dollars they have. To EXCLUDE these essential organizations is a grave misstep at a time when they are MOST needed by the communities they serve.</p>
4/16/2020 4:13:00 PM	PIO (Email from	McKinnon	Laura Lane	llmckinnon@employabilityga.org	EmployAbility Inc	<p>I write in opposition to the exclusion of non-profits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities.</p> <p>In short: The non-profit sector is every bit as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 non-profit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make non-profits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's non-profits.</p> <p>Non-profits are expected to address community issues and solve our society's problems, but we need adequate support ourselves to do so. Thank you.</p>
4/16/2020 4:14:00 PM	PIO (Email from	Bozard	Colleen	Personal Email Address		<p>I am writing to express opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Thank you for your consideration</p>

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4/16/2020 4:15:00 PM	PIO (Email from	Gala	Anand	agala@mooyah.com	Mooyah Franchising, LLC	Mooyah is a profitable, unlevered restaurant franchisor and operator, organized as a passthrough entity.  1)TAX DISTRIBUTIONS PERMISSIBLE: Please confirm that to the extent tax distributions (A) are set forth prior to April 8, 2020 (unless they are for newly formed entities) in governing documents (e.g., LLC Operating Agreements) and (B) not prohibited under any credit agreements, they shall be permissible for passthrough entities (i.e., they are not otherwise restricted by the "no dividends" rule.) Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers, like KPA, organized as pass-through entities.
4/16/2020 4:15:00 PM	PIO (Email from	Phillips	Nathan	nphillips@seattlemca.org	YMCA of Greater Seattle	As a leader at the YMCA of Greater Seattle, I am writing to urge that nonprofits, especially those with more than 500 employees be eligible for the Main Street Loan Program. Nonprofits like ours have depleted our cash reserves addressing COVID-related community needs, and need financial support to return to regular operations during COVID recovery. Nonprofit organizations should be explicitly named as eligible for the Main Street Lending program. While the CARES Act was an important step in relief, more support is needed especially for organizations like ours with over 500 employees that are not eligible for the Paycheck Protection Program. We were forced to move 2,200 of our employees (70%) to standby status until we can return to regular operations, and we are facing millions of dollars in losses this year.
4/16/2020 4:16:00 PM	PIO (Email from	Duffy	Sarah	Personal Email Address		Good afternoon,  I'm writing to express my strong opposition to the exclusion of nonprofits from the Main Street Loan Program. The nonprofit sector is just as critical to economic stability and recovery as for-profit business and it isn't logical to leave it out of the package.  Thank you, Sarah Duffy
4/16/2020 4:16:00 PM	PIO (Email from	Darley	Jason	jason@lifeport.com	LifePort, LLC.	Please confirm that to the extent tax distributions (A) are set forth prior to April 8, 2020 (unless they are for newly formed entities) in governing documents (e.g., LLC Operating Agreements) and (B) not prohibited under any credit agreements, they shall be permissible for passthrough entities (i.e., they are not otherwise restricted by the "no dividends" rule.) Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers, like LifePort, organized as pass-through entities.
4/16/2020 4:16:00 PM	PIO (Email from	Ryerson	Carrie	carrie_ryerson@shamrockfoods.com	Shamrock Foods Company	(1) Priority access for food distributors to the credit facility; (2) Loan forgiveness opportunities like with SBA loans; and (3) Loan interest deductions without regard to typical limitations OR 50% business interest limitation remains in effect. Shamrock Foods Company is a family-owned food distributor that provides transportation and logistics support to ensure food reaches any place where people consume away from home (e.g., hospitals, restaurants, schools, military bases, hotels). Before the pandemic, approximately 50 percent of the food in America was consumed outside the home. Given our customer base, we are experiencing significant revenue declines with a direct impact on jobs. Priority access to short term loan money, coupled with favorable terms, assists food distributors by helping to preserve jobs and provide direct support to food away from home sources. Food distributors are uniquely positioned to support food away from home sources in weathering this crisis. We are supporting the industry by essentially providing loans through deferred balances to help restaurants continue to obtain food to supply families. We are using our resources to develop education and tools to support restaurants as their business model shifts. We are working with restaurant associations to stimulate takeout business. We are partnering with grocers and food banks to help them overcome supply chain gaps and providing donated goods to assist the food insecure.

Main Street Lending Program Comments

4/16/2020 4:16:00 PM	PIO (Email from	Santa	Sue	ssanta@girlscouts.org	Girl Scouts of the USA	<p>Girl Scouts of the USA (GSUSA) and our 111 councils have been hit hard by COVID-19. Social distancing has derailed troop meetings, council events, and plans for summer camp. GSUSA and councils have quickly launched virtual activities for girls and their families, but the pandemic has interrupted Girl Scout Cookie sales as well as fundraising and sponsorships. Without greater access to capital, GSUSA and councils will be forced to slash programming, staff, and scholarships just as communities need Girl Scouts the most.</p> <p>Many nonprofits have been unable to access the Paycheck Protection Program. Further, as the full impact of the pandemic is realized, nonprofit borrowers will need more flexibility and coverage than the Paycheck Protection Program provides. As the Treasury Department works to make loans available under section 4003(c)(3)(D) of the CARES Act, we respectfully request the following:</p> <ul style="list-style-type: none"> <li>Eliminate the 500-employee minimum for 501(c)(3) organizations seeking mid-sized business loans;</li> <li>Open the Main Street Lending Program to 501(c)(3) organizations contributing to COVID-19 relief efforts;</li> <li>Include a 0.50% interest rate for 501(c)(3) organizations with a minimum 5-year amortization;</li> <li>Defer payments until at least two years after a direct loan is made; and</li> <li>Base employee retention on the date of the loan's origination.</li> </ul> <p>These steps will allow nonprofits to meet the immediate needs of our communities as well as plan for the future when our services will be needed most.</p>
4/16/2020 4:17:00 PM	PIO (Email from	Whiffen	Karla	whiffenk@fccare.org	Friendship Community Care, Inc.	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> <li>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</li> </ul>
4/16/2020 4:18:00 PM	PIO (Email from	LaPallo	Francis	flapallo@manatt.com	Manatt	<p>Loma Linda University Health, a nonprofit organization in California including 8 professional schools, 6 hospitals and over 900 faculty physicians, offers these comments on the Main Street Lending Program (Program) to support inclusion of nonprofit organizations as "eligible businesses" under the Program.</p> <p>Nonprofits employed 10.2% of the private workforce in 2016. Excluding nonprofit organizations undermines the CARES Act (Act) goal to preserve employment.</p> <p>The Act contemplates nonprofit organizations as "eligible borrowers." The Program is authorized under Act Section 4003(b)(4). Conditions for loans are set forth in Section 4003(c). Section 4003(c)(3)(D) (Assistance for Mid-Sized Businesses) states "eligible businesses" include "to the extent practicable nonprofit organizations." Section 4003(c)(3)(D)(i). The Program is described in subpart (ii) of that section: "Nothing in this subparagraph shall limit the discretion of the Board of Governors of the Federal Reserve System to establish a Main Street Lending Program or other similar program or facility that supports lending to small and mid-sized businesses on such terms and conditions as the Board may set . including any such program in which the Secretary makes a loan, loan guarantee, or other investment under subsection (b)(4)." Thus, the reference to eligible "nonprofit organizations" applies to loans made pursuant to Section 4003(b)(4). No references in the Act call for exclusion of nonprofits.</p>
4/16/2020 4:18:00 PM	PIO (Email from	Campbell	Haleigh	vticoordinator@ywcaustin.org	YWCA Greater Austin	<p>I believe there is a great need to INCLUDE non-profits that serve in the social services sector in the current Main Street Covid-19 relief package.</p> <p>These organizations are the lifeblood of the communities we serve, providing essential services to the most vulnerable people in a community. Additionally, non-profits, such as the over 200 affiliates of YWCA USA are in turn employers in the markets in which we operate. Social service non-profit organizations, by mandate of our non-profit status and our oversight governance are the MOST efficiently run organizations that perennially DO THE MOST with the operating dollars we have. To EXCLUDE these essential organizations is a grave misstep at a time when we are MOST needed by the communities we serve. YWCA Greater Austin provides mental health counseling, care coordination, educational, and other services. In the last month, we have seen an increase in the mental health needs of our community. People are in isolation, uncertain and presented with emotions and situations they have never before fathomed, much less lived. The work that organizations like mine provide in the community is essential to the overall health and wellness of our people. We cannot be excluded from opportunities like those proposed in the Main Street Covid-19 relief package.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 4:19:00 PM	PIO (Email from	Alshut	Shawn	salshut@stud ioa2- design.com	Museum of Design Atlanta	<p>As a Board Member for the Museum of Design Atlanta, I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities.</p> <p>The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>The Museum of Design Atlanta (MODA) has been working tirelessly to bring needed enrichment activities to children and relief to their parents by providing valuable learning from trusted providers. That work continues even though MODA is strapped for cash. On premises revenue has been eliminated, donors have lost jobs and contributors, who are concerned about their business's future, are holding funds. We need help and OUR COMMUNITY NEEDS US, today and tomorrow.</p> <p>As large employers alone, non-profits like MODA deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>With local community leadership, nonprofits have held the country together through these days of hardship and unity. Please make it possible for our communities to emerge from this crisis whole by including nonprofits in the Main Street Loan program.</p>
4/16/2020 4:19:00 PM	PIO (Email from	Gala	Anand	agala@mooy ah.com	Mooyah Franchising, LLC	<p>CONTEXT: Mooyah a profitable, unlevered restaurant franchisor and operator, organized as a passthrough entity.</p> <p>TAX DISTRIBUTIONS PERMISSIBLE: Please confirm that to the extent tax distributions (A) are set forth prior to April 8, 2020 (unless they are for newly formed entities) in governing documents (e.g., LLC Operating Agreements) and (B) not prohibited under any credit agreements, they shall be permissible for passthrough entities (i.e., they are not otherwise restricted by the "no dividends" rule.) Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers, like Mooyah, organized as pass-through entities.</p>
4/16/2020 4:19:00 PM	PIO (Email from	Fontes	Michele	Michele.fonte s@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>
4/16/2020 4:20:00 PM	PIO (Email from	Brookhart	Sarah	sarah.brookh art@psycholo gicalscience. org	Association for Psychological Science	<p>The Association for Psychological Science encourages the inclusion of nonprofits as eligible for loans through the Main Street Lending program. Nonprofits support functions of significant benefit to the public, particularly during the current public health and economic crisis, such as ensuring the quality and timeliness of research that is disseminated to the public and providing access to science-based information that can help individuals, families, communities, government, and businesses cope. COVID-19 has negatively affected the ability of nonprofits to fill these important roles. Lending through the Main Street program would provide vital support to organizations in dire need of financial help during this crisis.</p> <p>As an example, APS is a nonprofit scientific association that promotes awareness and understanding of psychological science. It supports research psychologists working towards solving society's most difficult problems. As a result of COVID-19, APS had to cancel its annual scientific convention, which is one of APS's key scientific activities and also generates significant revenue for the association. Main Street Lending support would help APS recover from this cancellation and position the organization to prepare for other threats such as reduced membership and membership revenue resulting from COVID-19. APS will be directly affected by the likely downturn in federal research funding and the other negative effects being experienced by universities.</p>



Main Street Lending Program Comments

4/16/2020 4:20:00 PM	PIO (Email from	Pepperworth	Jeff	JPepperworth@igps.net		<p>CONTEXT: iGPS is a profitable, modestly-leveraged operating company organized as a passthrough entity. Its debt structure includes ABL debt, a senior term loan, capital leases and convertible debt.</p> <p>1)TAX DISTRIBUTIONS PERMISSIBLE: Please confirm that to the extent tax distributions (A) are set forth prior to April 8, 2020 (unless they are for newly formed entities) in governing documents (e.g., LLC Operating Agreements) and (B) not prohibited under any credit agreements, they shall be permissible for passthrough entities (i.e., they are not otherwise restricted by the &amp;quot;no dividends&amp;quot; rule.) Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers organized as pass-through entities.</p> <p>2)LEASES: Please confirm whether capital and/or operating leases would count in the definition of &amp;quot;debt.&amp;quot;</p> <p>3)OTHER DEBTS CAN CONVERT INTO EQUITY: Please confirm that the program would not prohibit or in any way be affected by a conversion of some convertible debt into equity at any time post-closing, regardless of the seniority or juniority of the convertible debt. A conversion of any debts to equity will enhance the credit quality of the borrower and Main Street loan outstanding.</p>
4/16/2020 4:21:00 PM	PIO (Email from	Skipper	Gray	gskipper@scotchplywood.com	Scotch Plywood Company, Inc.	<p>To The Board of Governors,</p> <p>The Main Street Lending Facility has a clause that says the borrower must calculate and deduct from its maximum loan amount of its committed but undrawn debt facilities. In asset based lending such as secured by finished goods as wood products the maximum amount is an absolute that comes with ranges of safeguards levels that when tapped require more fees and more stringent collateral reporting requirements. This is used throughout the wood products industry from wood dealers (buyers of standing timber), manufacturers, wholesalers, distributors, and retailers. Using the maximum and not the amount of debt incurred at the point of applying for the MSLF. I would suggest to remove the &amp;quot;committed but undrawn debt&amp;quot; from the language.</p> <p>Thank you for the opportunity to comment.</p> <p>Respectfully submitted,</p> <p>Gray Skipper Vice President Scotch Plywood Company, Inc.</p>
4/16/2020 4:21:00 PM	PIO (Email from	Cottingham	Audrey	cottinghama@fccare.org	Friendship Community Care	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</p> <p>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</p> <p>Payments shall not be due until two years after a direct loan is made;</p> <p>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</p> <p>In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 4:22:00 PM	PIO (Email from	Officer	Rock Zierman	CIPA.org	California Independent Petroleum Association	<p>The current eligibility requirements for CARES Act Main Street, Corporate Credit Facility and National Security Loan programs exclude an entire critical infrastructure sector - independent American oil &amp; gas producers who generate 83% of domestic crude oil. The California Independent Petroleum Association represents hundreds of producers who are designated as critical to national defense in the Defense Production Act. Producers have been severely impacted by COVID-19, a situation exacerbated by foreign commodity price manipulation by Saudi Arabia and others threatening American energy independence. This has significantly impacted short-term liquidity and credit ratings of American producers. The Federal Reserve and Secretary of the Treasury could enable producers to access CARES Act loans by making the following changes:</p> <p>Main Street Programs: Apply the EBTIDA leverage ratio to senior bank debt only, rather than total debt since the Fed can acquire a senior position.</p> <p>Corporate Credit Facilities: Remove the rating requirement since the CARES Act seeks to bolster short-term liquidity and already requires that the borrower must not be in bankruptcy proceedings.</p> <p>National Security Program: Expand the definition of &amp;quot;businesses critical to maintaining national security&amp;quot; beyond specific weapons systems to include independent oil &amp; gas producers who supply needed energy and feedstocks for national defense as recognized by the Defense Production Act.</p>

Main Street Lending Program Comments

4/16/2020 4:23:00 PM	PIO (Email from	Johnson	Scott	Personal Email Address	<p>I am providing this comment in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business and such organizations should have access to these loan facilities.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>I ask that the Federal Reserve make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p> <p>Thank you.</p> <p>Scott Johnson</p>
4/16/2020 4:23:00 PM	PIO (Email from	Collins	Carrie	c.collins@ymcanwnc.org	<p>YMCA of Northwest North Carolina</p> <p>The YMCA of Northwest North Carolina has been a cornerstone of the community for many years. Despite recent layoffs and facility closures due to the COVID-19 pandemic, we are working tirelessly to support those in need in our community. Over the past month we have offered emergency child care to essential workers, food distribution (over 5000 meals served so far), made thousands of wellness calls to seniors, and transitioned multiple branches for weekly blood drives In 2019, we served 152,000 people in 7 counties with the support of 1912 dedicated employees. Our organization has had to lay-off 91% of our workforce, 1740 people, and are projecting a \$2.5M loss in revenue between March 15th and June 30th, with the potential for additional losses due to the uncertainty of continued social distancing requirements when we are able to reopen. Our communities need nonprofits like the Y now more than ever but more help is needed for non-profit organizations with more than 500 FTE employees. We were not able to apply for the Paycheck Protection Program because of our size and without access to support our Y, and other larger non-profits, will not be able to resume operations as we knew it or retain our staff. Your support would ensure that we can continue to provide urgently needed services for our communities and continue to support our staff as one of the larger employers in the region. Thank you for looking into this matter and for your service to our nation in this time of crisis.</p>
4/16/2020 4:24:00 PM	PIO (Email from	Jarvi	Jessica	jjarvi@westernalliancebank.com	<p>Western Alliance Bank</p> <p>WAB is concerned the Programs do not provide meaningful financial support to businesses for two primary reasons: 1. Limiting loan size to a multiple of EBITDA eliminates a significant numbers of borrowers. Borrowers in our bank's Tech and Hotel loan portfolios would not be able to participate even though they were in good financial standing prior to the crisis. 2. The broad restrictions on use of loan proceeds constrain borrowers' abilities to steady themselves financially, are too restrictive for most borrowers, and hamstringing our ability to work with borrowers in good faith.</p> <p>We also have the following questions:          Terms and Conditions: Can fees be financed in the loan? Do leveraged lending rules apply (i.e. deleveraging)? Will CRE loans be allowed to upsize based on LTV? What is the definition of EBITDA (i.e. TTM, projected, or addbacks)? What is the amortization schedule after deferral? What is the expectation at maturity? Is SOFR the only rate available? Will it require compounding, lock-ins, or lookbacks? Does the FRB get the benefit of existing recourse agreements? Will loans have delayed draw features?          Attestations: What due diligence is expected by the bank? Do PPP loan payoffs trigger prohibition on paying debt? Do banks monitor borrowers' ongoing compliance with attestations?          Participations: What pre-approval is required? What happens if a borrower certification is temporarily untrue (i.e. curable)? Can syndicated facilities be participated?</p>
4/16/2020 4:24:00 PM	PIO (Email from	Hobbs	Elisabeth	TEST@TEST.com	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 4:25:00 PM	PIO (Email from	Davidson	Ethan	Personal Email Address	Purpose Built Communities	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 4:25:00 PM	PIO (Email from	Daly	Tim	tim.daly@westernunion.com	Western Union	<p>On behalf of Western Union, a leader in global money movement and payment services with a 170 year track record of innovation and success, I write today regarding lender eligibility requirements under the Main Street Lending Facility.</p> <p>Western Union operates in the US through approximately 10,000 agents that offer our money transfer services, and we estimate that at least 8000 of those are small and medium-sized businesses. Through our Western Union Business Solutions affiliate we also support the commercial needs of 4000 businesses in the US, many of whom may qualify for the Main Street Lending program. Many of these businesses have been seriously impacted by COVID-19 and need government assistance during this unprecedented time.</p> <p>To broaden the scope of the Main Street Lending program to as many small and medium-sized businesses as possible, we respectfully recommend expanding lender eligibility under the program to include non-depository institutions, similar to what is allowed under the Paycheck Protection Program.</p> <p>We appreciate your consideration of this request, and we appreciate your efforts to bolster our economy during this unprecedented time.</p> <p>Respectfully, Tim Daly Head of Global Public Policy Western Union</p>
4/16/2020 4:25:00 PM	PIO (Email from	Gillis	Audrey	agillis@nonprofitpractice.org	Institute for Nonprofit Practice	<p>As a Board member of Thom Child and Family Services, I urge you to ensure that the Main Street Lending Program and any subsequent mid-size loan programs are fully available to nonprofits, including those with 500 employees or more.</p> <p>The CARES Act made two loan programs (EIDL, PPP) available to nonprofits with 500 employees or fewer. Those provide important relief but they are not available to nonprofits that employ more than 500 people. This is a significant barrier to relief for nonprofit institutions with large workforces administering critical programs and services.</p> <p>As Treasury and the Fed work to implement 167,4003(c)(3)(D), providing financing to lenders to make loans to nonprofits and other employers with up to 10,000 employees, I urge you to:</p> <ul style="list-style-type: none"> <li>-Include an interest rate of 0.50% (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization;</li> <li>-Provide priority to 501(c)(3) charitable nonprofits and require lenders to make a proportionate number and value of loans to nonprofits to prevent the crowding out that is being seen in the Paycheck Protection Program;</li> <li>-Set a date certain for when employee retention provisions should begin; and</li> <li>-Set forth that payments shall not be due until two years after a direct loan is made.</li> </ul> <p>Thank you for your consideration.</p> <p>Sincerely, Audrey Gillis</p>

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Main Street Lending Program Comments

4/16/2020 4:26:00 PM	PIO (Email from	Bradshaw	William	will@greencoastenterprise.com	Tulane University, Green Coast Enterprises	<p>We are developing a framework that will measure pandemic payment risk on a 100 point scale, based on 2 variables:</p> <p>transmission risk - how likely is the functioning of a business to spread the virus, from 0-10. With 10 being the most likely.</p> <p>Essential service - how essential is the business. With 10 being the least essential.</p> <p>Pandemic payment risk = transmission risk x essential service.</p> <p>Using work like the Moody's index to measure the essential nature of different industries, and Christos Makridis work to measure the economic impact of the virus (which can be adapted to approximate transmission risk by industry), one could develop an exogenous measure of pandemic payment risk for any particular cash flow stream, and isolate the types of businesses and loans that this program needs to support.</p> <p>By making these loans to both borrowers and tenants, you prevent gaming the system, and by having specific public health measures in place around their servicing, you help ensure that non-essential operations that are likely to transmit disease stay closed for as long as necessary, by paying them to do so.</p> <p>This will also help ensure that businesses least able to function don't sink the loans or loan portfolios of businesses, and it provides an indirect support for businesses that couldn't otherwise sustain their operating costs through this time, by removing their rent obligation for an extended period.</p>
4/16/2020 4:27:00 PM	PIO (Email from	Timms	Henry	lklein@lincolncenter.org	Lincoln Center for the Performing Arts	<p>Nonprofits across the country are the number-one driver of tourists to our cities and providers of programming to our communities. At Lincoln Center, we are therefore disappointed that the Main Street Lending Program does not include opportunities for nonprofits of all sizes to access robust stimulus funding. We are asking the federal government to include cultural organizations in provisions helping businesses survive this crisis.</p> <p>The CARES Act provides some relief but it is insufficient to our needs. We request that the Main Street program be revised to benefit nonprofits, including the following:</p> <p>A favorable interest rate for 501(c)(3) charitable nonprofits</p> <p>Loan forgiveness provisions to help ensure nonprofits, including cultural organizations, will be able to continue to provide services during the crisis (such as our online performances) and assist with our nation's recovery.</p> <p>Arts and culture revived New York City's downtown after 9/11. Following the 2008 economic crisis, New York's rich culture brought tourism back to New York. Now is the time for our cultural institutions to play a critical role in our recovery, both economically and socially.</p>
4/16/2020 4:28:00 PM	PIO (Email from	Armlin	Tony	tony.armlin@triplefive.com	Triple Five	<p>We have submitted by separate email with attachments</p>

Main Street Lending Program Comments

4/16/2020 4:28:00 PM	PIO (Email from	Burgos	Alex	aburgos@tecnhnet.org	TechNet	<p>Since the Fed’s Main Street New Loan and Expanded Loan Facility programs were announced on April 9, several of TechNet’s smaller member companies have raised concerns that need to be addressed, including the requirement that applicants need to have been “EBITDA-positive” in 2019 in order to qualify. This would indiscriminately exclude many promising, high-quality, and credit-worthy businesses, including fast growing startups.</p> <p>To illustrate the problem, here are a few examples of why the “EBITDA-positive in 2019” requirement would leave out many worthy businesses that are now being challenged by the coronavirus’s impact:</p> <p>A company that had been profitable from 2015-2018 but decided to expand into new work in 2019 and was intentionally EBITDA negative in 2019.</p> <p>A new business that required significant investment at the start of 2019 but grew to profitability by the end may not have been EBITDA positive for all of 2019.</p> <p>An investor-backed start-up that decided 2019 was a year to invest in growth and may not have been EBITDA positive in 2019.</p> <p>Via a separate email, we are submitting additional comments and suggestions from TechNet elaborating on this and other concerns raised by our member companies, who are trying to save jobs, continue innovating, and keep their businesses open - in addition to stepping up to do their part to help our nation overcome this unprecedented challenge.</p>
4/16/2020 4:29:00 PM	PIO (Email from	Rose	Judi	jrose@vchcare.org	Valley Community Healthcare	<p>Valley Community Healthcare is a private non-profit 501(c)(3) agency that provides free and low-cost medical care and mental health services to over 26,000 low-income men, women, and children in the San Fernando Valley region of Los Angeles County. We are deeply concerned to learn that nonprofits are ineligible for the Federal Reserve’s new “Main Street” lending facility, despite the fact that nonprofits are leading the effort to respond to this pandemic. In order to meet the needs of our patients while still keeping them safe, we were forced to completely re-organize our business model. Currently 90% of our care is being provided remotely, significantly reducing revenue, along with reducing exposure to the virus for thousands of vulnerable patients and staff. Nonprofits like ours urgently need access to these government backed revenue streams and loan programs. Given the current financial crisis and loss of revenue, nonprofits, including critical health care entities, may be forced to shrink their services, meaning tens of thousands could go without care. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.</p>
4/16/2020 4:31:00 PM	PIO (Email from	McBrien	Bridget	Personal Email Address	The Jewish Board of Family & Children’s Services	<p>The Jewish Board of Family and Children’s Services serves more than 43,000 New Yorkers with programming related to mental health counseling, foster care, domestic violence, supportive housing, and early childhood education. As an organization, we employ more than 2,500 staff members. The charitable nonprofit community appreciates that several key relief programs in the CARES Act were modified to include nonprofit eligibility. This approach recognizes the significant role that charitable nonprofits play as the third largest employer in our nation’s economy and as valued problem solvers. We urge the administration to support the following: Expand Nonprofit Access to Credit by designating funding exclusively for nonprofits within the two principal loan programs established in the CARES Act to ensure that the organizations dedicated to addressing immediate pandemic-related problems are included in relief efforts and not excluded.</p> <p>Paycheck Protection Program: Provide incentives to private lenders and expand the eligibility for nonprofits to participate in the Paycheck Protection Program by modifying the current 500-employee cap.</p> <p>Mid-Size Business Loan Program: Adjust CARES Act Section 4003(c)(3)(D) to implement a program to support nonprofit employers with between 500 and 10,000 employees, including loan-forgiveness and other provisions. The legislation should direct the Treasury Department to have this program operational no later than 15 days after enactment.</p>

Main Street Lending Program Comments

4/16/2020 4:31:00 PM	PIO (Email from Myren	Myren	Matt	mmyren@enesco.com	Enesco, LLC	<p>Enesco is a 62-year-old, profitable, gift wholesaler. Confidential Business Information</p> <p>In 2019, Enesco's subsidiary acquired a 53-year-old retailer of engraved gifts Things Remembered (TR) out of BK. The transaction saved 1000+ jobs (email attachment to come). Enesco capitalized TR with no debt of its own. TR lost money in 2019, the year it emerged from BK.</p> <p>1)DECONSOLIDATE A SUBSIDIARY THAT INCURRED STARTUP LOSSES IN 2019: Please confirm ability of a Parent (Enesco) to exclude a subsidiary (TR) or sister, which incurred startup losses in 2019, from the EBITDA/leverage analysis (as opposed to requiring Enesco + TR to submit one application on a consolidated basis.) If TR is consolidated with its parent, startup losses would disqualify Enesco from receiving a loan. Please confirm ability to add back TR's losses.</p> <p>2)SEASONAL FLUCTUATIONS IN DEBT: For the purpose of calculating debt in seasonal businesses, please allow consideration of the loan application's calendar timing. We propose businesses affected by consumer/retail, weather, etc replace the debt calculation with the (i) average debt balance over the last 12 month ends +/- (ii) the change in the applicant's net working capital vs 12 months prior to the application date. This would prevent distortions in leverage ratios due to seasonality.</p>
4/16/2020 4:31:00 PM	PIO (Email from Roman	Roman	Brandon	brandon.roman@squirepb.com	Squire Patton Boggs (on behalf of non-bank financial firms)	<p>A new 13(3) facility is required to assist non-bank financial firms (NBFFs) in continuing to extend credit to millions of Americans. The terms of the MSLP effectively prevent NBFFs from accessing the liquidity they desperately need, and none of the other current 13(3) facilities meet NBFFs' unique liquidity needs.</p> <p>By way of follow-up to this submission, we are e-mailing an attachment to regs.comments@federalreserve.gov with additional information.</p>
4/16/2020 4:31:00 PM	PIO (Email from Quintero	Quintero	Janine	jquintero@hscfs.org	Hathaway-Sycamores	<p>Related to COVID 19-</p> <p>I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>Payments should not be due until two years after a direct loan is made</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower</li> </ul> <p>In any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents</p>
4/16/2020 4:31:00 PM	PIO (Email from Kirpalani	Kirpalani	Rohit	rohit.kirpalani@atlanticus.com	Atlanticus Holdings Corporation	<p>A new 13(3) facility is required to assist non-bank financial firms (NBFFs) in continuing to extend credit to millions of Americans. The terms of the MSLP effectively prevent NBFFs from accessing the liquidity they desperately need, and none of the other current 13(3) facilities meet NBFFs' unique liquidity needs.</p> <p>By way of follow-up to this submission, we are e-mailing an attachment to regs.comments@federalreserve.gov with additional information.</p>
4/16/2020 4:33:00 PM	PIO (Email from Ruiz	Ruiz	Crystal	CRUIZ@AMERICANORNITHOLOGY.ORG	American Ornithological Society	<p>Regarding Main Street Lending and proposed financial CARES 2 legislation: It is critical that all 501's have access to relief as small employers. Without access to relief funds, all employers, including 501's will be forced to make difficult staffing and operating decisions.</p>
4/16/2020 4:34:00 PM	PIO (Email from Mikell	Mikell	Kayleigh	Personal Email Address	Out Front Theatre company	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 4:34:00 PM	PIO (Email from	Cuttler	Sandra	Personal Email Address	Ms.	<p>I am against the exclusion of nonprofits from the Main Street New &amp; Expanded Loan Facilities. The nonprofit sector is critical to maintaining our society, economic stability and recovery as for-profit business.</p> <p>Georgia has over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 4:34:00 PM	PIO (Email from	Rozwod	Thomas	thomas.rozwood@norpacpaper.com	North Pacific Paper Company, LLC	<p>On behalf of our employees and families, I write to you today asking for your help as North Pacific Paper Company (NORPAC) tries to keep operating during the unprecedented COVID-19 pandemic. Today, NORPAC remains one of the largest employers and economic drivers in Southwest Washington and Northern Oregon. We employ 450 people with an annual payroll of over \$40 million. As is the case with many other small rural manufacturing businesses, Confidential Business Information [REDACTED].</p> <p>[REDACTED]. We were hopeful that we would be able to secure a Payroll Protection Plan loan to enable us to keep paying our employees during this period but appear to be roadblocked because of the Small Business Administration's affiliation rule, since our company is owned by a private equity firm, One Rock Capital.</p> <p>It does not seem right that NORPAC, a rural manufacturing company, should be denied access to PPP or Main Street funds simply because One Rock was willing to invest in NORPAC when Weyerhaeuser was looking to exit the business we're in. Confidential Business Information [REDACTED]. I ask for your support in removing the barriers to loan access for small companies who happen to be owned by private equity firms.</p>
4/16/2020 4:35:00 PM	PIO (Email from	Lagesse	Jason	j.lagesse@ymcanwnc.org	YMCA of Northwest North Carolina	<p>The YMCA of Northwest North Carolina has a long standing history of responding and meeting community needs. Impacting the lives of over 150,000 people in 7 counties, we have adapted our services to support our neighbors through the COVID-19 pandemic. Our Y is currently providing emergency child care to essential workers, distributing meals in at risk neighborhoods (over 5000 meals served so far), making thousands of wellness calls to seniors, and transitioning multiple branches for weekly blood drives. As a large non-profit, our dedicated staff are our most valuable resource. Prior to the pandemic and subsequent facility closures due to social distancing measures, our Y employed 1912 people (520 FTE), making us one of the largest employers in the region. We have since had to lay off 91% of our workforce, 1740 people. We are committed to serving northwest North Carolina and will continue working tirelessly to support those in need in our community despite recent layoffs and facility closures. The CARES Act was a first step toward supporting nonprofits through the economic crisis, however we were not able to apply for the Paycheck Protection Program because of our size. We are projecting a \$2.5M loss in revenue between March 15th and June 30th and your support would ensure that the Y and other large non-profits can continue to provide urgently needed services for our communities. Thank you for looking into this matter and for your service to our nation in this time of crisis.</p>
4/16/2020 4:36:00 PM	PIO (Email from	Ibold	Charles	cibold@thingsremembered.com	Enesco Properties, LLC d/b/a Things Remembered	<p>CONTEXT: ThingsRemembered (TR) is a 53-year-old retailer of engraved gifts, acquired out of bankruptcy, in a transaction that saved 1000+ jobs (email attachment forthcoming), by Enesco, a 62-year-old, profitable, gift wholesaler. While Enesco (the parent) made Confidential Business Information [REDACTED]; it too has been decimated by Covid-19. Confidential Business Information [REDACTED].</p> <p>REQUEST RE JOB-SAVING TURNAROUNDS: We respectfully request that applicants be permitted to either:</p> <ol style="list-style-type: none"> <li>1) use "3 x ( 2019 avg mo. payroll + 2019 avg mo. rent )" instead of 2019 EBITDA or</li> <li>2) add back "6 x 2019 avg mo. payroll" to its EBITDA to account for the social benefit of the jobs it has saved.</li> </ol> <p>We propose this alternative only in the limited cases where 2 conditions are met:</p> <ol style="list-style-type: none"> <li>A) Company was a bona fide purchaser of third-party assets in a bankruptcy that can be demonstrated to have saved 500+ jobs in 2019 and incurred startup losses in so doing and/or</li> <li>B) Majority of the company's operations have been substantially shut down in March through May 2020 due to a stay at home orders (e.g., retail cannot open).</li> </ol> <p>We also request that Parent companies be permitted to deconsolidate subsidiaries or sister companies from the EBITDA/leverage analysis, but only where conditions (A) and (B) above are met.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 4:36:00 PM	PIO (Email from	Tourjee	Seth	seth.tourjee@as220.org	AS220	Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.
4/16/2020 4:38:00 PM	PIO (Email from	Jude	Jamil	jjude@truecolorstheatre.org	True Colors Theatre Company	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 4:41:00 PM	PIO (Email from	Gomez	Minerva	mgomez@hscfs.org	Hathaway-Sycamores	I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000)
4/16/2020 4:42:00 PM	PIO (Email from	moebes	michael	Personal Email Address		We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 4:42:00 PM	PIO (Email from	L'Hommedieu	Michelle	mlhommedieu@hscfs.org		Related to COVID19: I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following: oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts oPayments should not be due until two years after a direct loan is made oEmployee retention provisions should begin on the date that loan funding is received by the borrower oIn any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents  Thank you.



Main Street Lending Program Comments

4/16/2020 4:43:00 PM	PIO (Email from	Roman	Brandon	brandon.roman@squirepb.com	Squire Patton Boggs (on behalf of the American Staffing Association)	<p>Numerous businesses and government entities are utilizing the staffing industry to supply temporary employees throughout the COVID-19 pandemic. These temporary and contract employees have aided our country by producing and delivering necessities, supplying critically needed health care services, and helping state and local governments manage the influx of unemployment and financial assistance caseloads.</p> <p>However, delivering these vital services only accounts for a small portion of staffing firms' pre-crisis revenue, and many still face catastrophic declines in work orders because temporary workers are usually the first to be laid off during an economic downturn.</p> <p>In an effort to enable staffing firms to continue providing essential services and survive the current economic downturn, it is critical that the Main Street Lending Program ensure that funds be set aside - or, at a minimum, prioritized - to provide business assistance for staffing firms.</p>
4/16/2020 4:45:00 PM	PIO (Email from	Mattina	Christopher	cmattina@vestamodular.com	Vesta Housing Solutions, LLC	<p>CONTEXT: Vesta is a profitable, modestly-leveraged modular construction and mobile-module leasing operating company, organized as a passthrough entity.</p> <p>1)TAX DISTRIBUTIONS PERMISSIBLE: Please confirm that tax distributions are not otherwise restricted by the "no dividends" rule. Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers, like Vesta, organized as pass-through entities.</p> <p>2)ADJUST FOR SEASONAL FLUCTUATIONS IN DEBT: For the purpose of calculating debt in seasonal businesses, we propose the following alternative calculation of "debt" in businesses affected by seasonality of consumer/retail, weather, construction, etc.:</p> <ul style="list-style-type: none"> <li>(i) average debt balance over the last 12 month ends +/-</li> <li>(ii) the change in the applicant's net working capital the borrower vs 12 months prior to the application date.</li> </ul> <p>This would prevent distortions where leverage ratios may vary dramatically depending on whether an application is filed in May vs. in September.</p> <p>3)Please confirm the parameters for using its cash profits or new debt proceeds (other than proceeds from the Main Street Lending Program) to retire any of its outstanding debts and/or preferred equity. This would allow Vesta to retire higher cost fixed obligations - provided that such repayment is not financed by the Main Street loan proceeds.</p> <p>4)PREFERRED DEBT: Please confirm that retirement of preferred equity is not considered a "dividend" for purposes of the CARES Act.</p>
4/16/2020 4:45:00 PM	PIO (Email from	Gallardo	Natalie	ngallardo@hscfs.org		I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California.
4/16/2020 4:45:00 PM	PIO (Email from	Field	Justin	jfield@nvca.org	National Venture Capital Association	<p>NVCA (Charts via email)</p> <p>EBITDA</p> <p>Prob.-MSLF requires EBITDA, excluding growth companies which do not have EBITDA but are creditworthy</p> <p>Sol.-Alternate test using independent valuations or \$ preferred investment</p> <p>Capital distribution in M&amp;A or IPO</p> <p>Prob.-Even if MSLF loan retired, equity holders cannot receive proceeds for a year</p> <p>Sol.-Proceeds of liquidity event distributable to equity holders if MSLF loan is paid off prior to distributions</p> <p>Access for companies fighting COVID-19</p> <p>Prob.-Exclusion of companies fighting COVID-19</p> <p>Sol.-Exigent COVID-19 circumstances include fighting COVID-19 and its effects</p> <p>Preexisting equity awards and compensation</p> <p>Prob.-if included in comp calculation, equity awards vesting under previous agreements can disqualify growth companies, even though illiquid</p> <p>Sol.-Compensation excludes value of equity awards that vest under agreements prior to 3/27/20</p> <p>Requirement of existing lenders to agree to MSLF loan</p> <p>Prob.-Borrowers must obtain consent from current lenders before taking MSLF loan</p> <p>Sol.-Lenders may restructure other debt so long as not senior to MSLF, and MSLF loan is not used to pay down other debt</p> <p>Limitations on reductions in debt/existing lines of credit</p> <p>Prob.-Lenders would lose ability to restructure credit lines/reduce debt during MSLF loan, creating credit and asset management dangers for banks</p> <p>Sol.-Limitations on reductions in debt and existing lines of credit by lender only for the first year of MSLF loan</p>

Main Street Lending Program Comments

4/16/2020 4:47:00 PM	PIO (Email from	Jaworek	Donna	djaworek@thomchild.org	Thom Child and Family Services	<p>The non-profit agency I work for as a Director in Early Intervention has a 100 year history of helping families in Massachusetts. Last year, we delivered home visiting services to over 15,000 infants and toddlers. Our skilled staff of 864 professionals made this possible. And yet, because there are more than 500 of us, we were left without support for sick leave, paycheck protection, and forgivable loans. We are held to different criteria for the employee retention credit. We are left out of the economic stimulus that is essential for our organization's survival.</p> <p>The lack of cash flow to our agency, and others like ours, is leading to job loss. Without revenue from service delivery, we cannot pay staff. The longer term impact is that families and our service sector will suffer for decades. Across the country, programs like ours are closing, furloughing staff, and stopping services to children who need our help.</p> <p>With access to favorable lending terms and with the same stimulus funding that was offered to smaller non-profits, we can continue to employ our staff of nurses, therapists, speech-language pathologists, educators, and other skilled specialists. We can continue to support children and families. We can avoid an erosion of our social service sector. We need immediate action. Non-profit agencies of our size must be included in the Main Street Lending Program and any subsequent mid-size loan programs</p>
4/16/2020 4:47:00 PM	PIO (Email from	Geoghegan	Christine	cgeoghegan@thomchild.org	Thom Pentucket Early Intervention	<p>As a nurse who has worked in early intervention for many years I cannot imagine what some families would do without our support. These are children with genetic,neurological and neurodegenerative, metabolic and muscular skeletal disorders. We work with children with speech delays and disorders as well as behavioral, social emotional and children at risk for delay due to family conditions. We are essential to families who rely on help with their developing families. Children in our program are not developing normally and we need to support them more than ever now due to this pandemic. These are everyone's children and they are our future. We need to support the staff and programs behind them. We need access to more favorable lending terms and to the same stimulus funding that was offered to smaller non-profits. We must be included in the Main Street Lending Program and any subsequent mid-sized loan program.</p> <p>Thank you</p>
4/16/2020 4:47:00 PM	PIO (Email from	Keller	Scott	Scott@NSGDC.com	National Development Group	<p>Program structure looks good. I think it's very important to include residential and commercial development as an eligible activity. These projects are having a difficult time accessing capital due to COVID uncertainty. We're seeing a significant amount of labor sidelined as good projects are delayed.</p> <p>What will be the process for an eligible lending entity to access funds?</p> <p>What will be the process for an eligible borrower to initiate contact with an eligible lender? How quickly can funding occur?</p>
4/16/2020 4:47:00 PM	PIO (Email from	Oplustil	Joanne M.	Personal Email Address	CAMBA and CAMBA Housing Ventures	<p>In a normal year, CAMBA serves more than 65,000 New Yorkers by taking a comprehensive approach to address poverty across six program areas: Economic Development, Education/Youth Development, Family Support, Health, Housing, and Legal Services.</p> <p>The number of New Yorkers in need of our services has grown significantly with the pandemic. Before COVID-19 hit, CAMBA employed approximately 2,000 individuals. To meet demand for services, we will need to hire 500 more.</p> <p>We respectfully ask that you:</p> <ul style="list-style-type: none"> <li>Allow loan forgiveness for nonprofits or offer these organizations a 0% interest rate at a 5 year amortization;</li> <li>Ensure payments are not due until two years after a direct loan is made;</li> <li>Allow nonprofits maximum flexibility regarding the labor and collective bargaining-related certifications outlined for the program;</li> <li>Ensure employee retention provisions begin on the date the borrower receives loan funding and, in implementing workforce restoration/retention provisions, define workforce as full-time employees; and</li> <li>Give priority to 501(c)(3) nonprofits responding to COVID-19 relief efforts.</li> </ul> <p>CAMBA has served New York City for more than 40 years. Our model has been, and remains, to identify emerging needs and to quickly scale programs to tackle those problems. We are working every hour to ensure the health, safety, and security of thousands of Americans and we appreciate your thoughtful consideration of our request.</p>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 4:47:00 PM	PIO (Email from	Rivas	Karla	krivas@hscfs.org	Hathaway-Sycamores Child & Family Services	<p>I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California.</p> <p>I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following:</p> <ul style="list-style-type: none"> <li>oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>oPayments should not be due until two years after a direct loan is made</li> <li>oEmployee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>oIn any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents</li> </ul> <p>Many non-profit organizations are not able to access the Paycheck Protection Program , which is critical to ensure the continued provision of essential services during this crisis</p>
4/16/2020 4:48:00 PM	PIO (Email from	Shaver	Michael	mshaver@childrenshomeandaid.org	Children's Home & Aid	<p>Children's Home &amp; Aid is a large social service organization headquartered in Chicago, IL. While most of our sites are closed, we continue to serve 100% of our client population of nearly 20,000 vulnerable children and families during this critical moment in time.</p> <p>As the Treasury Department works to create a program as directed under the CARES Act (section 4003(c)(3)(D)) to provide financing directly to banks and other lenders for loans to nonprofits and other mid-size business sized between 500-10,000 employees, we request the following program components:</p> <ol style="list-style-type: none"> <li>1. Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization</li> <li>2. Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>3. Ensure payments not to be due until two years after a direct loan is made</li> <li>4. Employee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>5. In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents</li> </ol> <p>Many nonprofits like the one I lead employ more than 500 employees and have been unable to access the Paycheck Protection Program. The recommendations above will help to keep these organizations financially strong and allow them to continue to meet the immediate needs of their communities.</p>
4/16/2020 4:48:00 PM	PIO (Email from	Cannon	Mashariki	Personal Email Address		<p>YWCA and nonprofits across the country are on the front lines in our communities during the COVID-19 pandemic, working tirelessly to serve the most vulnerable people who need services. Nonprofits that serve in the social service sector MUST be included in the Main Street Covid-19 relief package. Nonprofits need financial support to keep their doors open to continue providing the desperately needed services for individuals and families across the country.</p>
4/16/2020 4:49:00 PM	PIO (Email from	San Pedro	Shannon	ssanpedro@hscfs.org	Hathaway-Sycamores Child and Family Services	<p>I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in Ca. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). Many non-profit organizations aren't able to access the Paycheck Protection Program, this is critical to ensure the continued provision of essential services during this crisis Without increased access to loan programs intended to sustain payroll and retain employees, these mid-sized non-profit organizations are at financial risk, a circumstance that could leave thousands of individuals without timely access to needed care. This lack of access to care will lead many Americans to utilize more emergency services, over-crowding community hospital emergency departments. This will drive up health care costs at a time when the health system is already strained caring for COVID-19 patients</p>
4/16/2020 4:50:00 PM	PIO (Email from	Mullins	Kevin	kevin.mullins@arccenters.com	Addiction Recovery Care, LLC	<p>In regards to the term of the program, I am concerned regarding the language that is placed on restricting dividend / distribution payments. For S-Corporations, this is used to pay the income tax liability by the individual owners of the S-Corporation. I am wondering if this is an unintended consequence of the legislation.</p> <p>I understand how this would apply to a C-Corporation, but it appears that &amp;quot;Corporation&amp;quot; is used too broadly. Please clarify the intent and the potential impact of this provision on S-Corporations. In closing, there are other &amp;quot;pass through&amp;quot; entities that will be impacted as well since distributions are made for tax liabilities for the company.</p>

Main Street Lending Program Comments

4/16/2020 4:51:00 PM	PIO (Email from	Winterhalter	Michael	michael.winterhalter@dentons.com	Dentons Cohen & Grigsby P.C.	<p>April 16, 2020                  Re:Main Street Lending                  Dear Sir or Madam:</p> <p>We respectfully provide below certain comments for consideration by the Federal Reserve System (“Federal Reserve”) and U.S. Department of the Treasury (“Treasury”) regarding the term sheets (“Term Sheets”) released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility (the “Main Street Program”) and the Main Street Expanded Loan Facility (the “Main Street Expanded Program” and, with the Main Street Program, the “Programs”) to support lending to small and medium-sized businesses (“Purpose”). Capitalized terms used but not defined in this letter have the meanings given in the Term Sheets.</p> <p>Required Attestations.</p> <p>With exception for the attestations regarding the use of proceeds to repay or refinance pre-existing loans or lines of credit, to repay certain other loan balances, and to make reasonable efforts to maintain its payroll and retain its employees, the Term Sheets do not restrict the use of proceeds by Eligible Borrowers.</p> <p>Many small and medium-sized businesses could be excluded from access to the Programs if required to make onerous or impracticable restrictions on the use of proceeds. Please confirm that, to support the Purpose, there will not be additional restrictions on the use of proceeds beyond those contained in the Term Sheets.</p> <p>Very truly yours,                  Michael Winterhalter, Dentons Cohen &amp; Grigsby P.C.</p>
4/16/2020 4:51:00 PM	PIO (Email from	Lavoie	Kim	Personal Email Address	Thom Child and Family Services	<p>The non-profit agency I work for has a 100 year history of helping families in Massachusetts. Last year, we delivered home visiting services to over 15,000 infants and toddlers. Our skilled staff of 864 professionals made this possible. And yet, because there are more than 500 of us, we were left without support for sick leave, paycheck protection, and forgivable loans. We are held to different criteria for the employee retention credit. We are left out of the economic stimulus that is essential for our organization’s survival.</p> <p>The lack of cash flow to our agency, and others like ours, is leading to job loss. Without revenue from service delivery, we cannot pay staff. The longer term impact is that families and our service sector will suffer for decades. Across the country, programs like ours are closing, furloughing staff, and stopping services to children who need our help.</p> <p>With access to favorable lending terms and with the same stimulus funding that was offered to smaller non-profits, we can continue to employ our staff of nurses, therapists, speech-language pathologists, educators, and other skilled specialists. We can continue to support children and families. We can avoid an erosion of our social service sector. We need immediate action. Non-profit agencies of our size must be included in the Main Street Lending Program and any subsequent mid-size loan programs</p>
4/16/2020 4:53:00 PM	PIO (Email from	Colon	Jason	Jason.colon@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

Note: At the commenter’s request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board’s intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 4:53:00 PM	PIO (Email from	Schmidt	Lorna	lorna.schmidt@cctwincities.org	Catholic Charities of St. Paul and Minneapolis	<p>We urge you to recognize mid-size nonprofits as eligible entities of the Main Street Lending Program and to consider forgivable loan options.</p> <p>Catholic Charities of St. Paul and Minneapolis has 580 employees and serves nearly 23,000 men, women, children and families. Nonprofits like ours comprise our nation's safety net, providing shelter, food, medical and other essential services to those most in need.</p> <p>COVID19 is creating a greater demand for social services. At the same time, the economic downturn is reducing revenues, and charitable contributions are likely to decrease, putting extreme financial stress on nonprofits as we seek to maintain critical safety net services for vulnerable populations.</p> <p>Federal relief has largely failed to recognize mid-sized charitable nonprofits (those with 500 or more employees). We are ineligible for the paycheck protection program, COVID19 tax credit and others, despite being significant employers. We do not qualify for other federal aid - such as that offered by FEMA, HUD and CDBG - which goes directly to state or local governments.</p> <p>Mid-sized nonprofits are key to a healthy economy and healthy communities. They need immediate access to forgivable and zero interest loans to respond to the increasing demands caused by the pandemic and to stabilize operations as we move toward recovery. Without it, many will be forced to significantly reduce services or close their doors at a time when services are needed most.</p>
4/16/2020 4:53:00 PM	PIO (Email from	Lee	Bryant	Personal Email Address		<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>
4/16/2020 4:54:00 PM	PIO (Email from	Ayers	Alex	aayers@hardinet.org	Heating, Air-conditioning, & Refrigeration Distributors International	<p>Heating, Air-conditioning, &amp; Refrigeration Distributors International (HARDI) is deeply concerned with the limitation put on companies using the Main Street Lending Program. Part of the attestations required to receive loans includes the limits on distributions of capital stock from Section 4003 of the CARES Act. Many businesses organized as S-corporations use distributions to pass-through tax payments to the individual owners to file through their 1040 forms. Without the ability to distribute these payments S-corps are effectively barred from participating in the Main Street Lending Program.</p>
4/16/2020 4:55:00 PM	PIO (Email from	Endres	Don	don@novitanutrition.com	Novita Nutrition	<p>Dear Board of Governors of the Federal Reserve,</p> <p>Novita Nutrition is in the business of producing high quality protein for the dairy industry and have a <b>Confidential Business Information</b></p> <p>Would it be possible to add a Debt to Asset metric of 60% after adding the Mainstreet financing as another method to determine the eligible amount? We appreciate your consideration and hope you would consider our request. With additional capital we are confident we can stay in operation and return to profitability after business returns to a more normal operating environment.</p> <p>We have tried to apply for the PPP program but the affiliation rule prevents our business from being eligible to receive financing. I would welcome the opportunity to answer additional questions and look forward to hearing back from you.</p> <p>Best regards, Don Endres CEO Novita Nutrition</p>

Main Street Lending Program Comments

4/16/2020 4:56:00 PM	PIO (Email from	Sahba	Lauree	ls@sandiego business.org	Economic Development Corp of San Diego County	As a privately-funded, regional economic organization (501c6) in a county with 70,000 businesses 98% of which are small enterprises, our team of 23 professionals are on the front line of the COVID crisis. In a typical year, we assist 150+/- companies expand their footprint in our county. In the last four weeks, we have triaged the needs of more than 400 small businesses, seemingly with no end in sight. Many do not have strong advisors in banking, legal and accounting. They need information, guidance and resources. We cannot reduce our ranks when companies so desperately need help to access complex systems. As a 501c6, we are not eligible for the Paycheck Protection Program. Our base of members has been hit hard by the crisis. We have already heard from many who cannot contribute funding this year. We are fighting to stay afloat. We applaud a CARES 2 package to provide desperately-needed resources and ask that it includes PPP eligibility for economic development nonprofits classified as a 501c6. Our services are vital to the survival of the most vulnerable small businesses and we will be a significant leader in developing and executing the recovery plan for San Diego County alongside state and local governments.
4/16/2020 4:56:00 PM	PIO (Email from	Banta	Ruth	Ruth.Banta@ PathlightGrou p.org	Pathlight, Inc.	We urge you to approve the Main Street Lending program. Pathlight is a 501(c)3 non-profit that has provided services to people with developmental disabilities and autism since 1952. We have 650 employees in Western Massachusetts. We do not qualify for the PPP. Since 80% of our expense are staffing, this is a significant issue for us. The COVID-19 pandemic has significantly increased our expenses as we need to staff our group homes 24/7 with incentive payments for staff. The cut off 500 employees for many of federal programs leaves out non-profits like Pathlight which put us, our staff and our services in fiscal peril.
4/16/2020 4:56:00 PM	PIO (Email from	Mitchel	Brandy	mitchelb@fcc are.org	Friendship Community Care	As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program: Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization; Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; Payments shall not be due until two years after a direct loan is made; Employee retention provisions should begin on the date that loan funding is received by the borrower; and In implementing any workforce restoration and retention provisions, &quot;workforce&quot; should be defined as full-time employees or full-time equivalents.
4/16/2020 4:56:00 PM	PIO (Email from	Stewart	Adrian	adrian.stewart@dentons.com	Dentons US LLP	April 16, 2020 Re:Main Street Lending Dear Sir or Madam: We respectfully provide below certain comments for consideration by the Federal Reserve System (&quot;Federal Reserve&quot;) and U.S. Department of the Treasury (&quot;Treasury&quot;) regarding the term sheets (&quot;Term Sheets&quot;) released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility (the &quot;Main Street Program&quot;) and the Main Street Expanded Loan Facility (the &quot;Main Street Expanded Program&quot; and, with the Main Street Program, the &quot;Programs&quot;) to support lending to small and medium-sized businesses (&quot;Purpose&quot;). Capitalized terms used but not defined in this letter have the meanings given in the Term Sheets. Eligible Loans. The Term Sheets include loan size limitations based on leverage conditions and the EBITDA of an Eligible Borrower. A.Many small and medium-sized businesses that are subject to increased leverage conditions could be excluded from access to the Programs based on these loan size limitations. To support the Purpose, these leverage conditions should be revised or qualified to permit such businesses that are subject to increased leverage conditions to have access to Eligible Loans. B.Many small and medium-sized businesses require adjustments to EBITDA. To support the Purpose, the Main Street Program and Main Street Extended Program should permit adjustments to EBITDA for purposes of determining the maximum loan amount. Very truly yours, Adrian Stewart, Dentons US LLP
4/16/2020 4:57:00 PM	PIO (Email from	Williams	Cassandra	Personal Email Address		I strongly object to the exclusion of nonprofits from the Main Street Lending Program. Nonprofits are desperately needed right now, and the current economic conditions have hit them especially hard.

Main Street Lending Program Comments

4/16/2020 4:57:00 PM	PIO (Email from	Wilson, Jr.	D. E. (Ed)	dwilson@venable.com	Venable LLP	<p>These comments are submitted on behalf of Venable LLP with regard to the MSELF:</p> <p>1. Definition of Eligible Borrowers. Amend the definition to clarify that only one of the two requirements stated need be met to be an eligible borrower. This can be accomplished either by inserting:  a. The word "either" after the word "businesses" in the first sentence of the definition, or  b. An additional sentence confirming that meeting either requirement (up to 10,000 employees or less than \$2.5 billion 2019 revenue) allows a borrower to qualify as an "Eligible Borrower."  Potential participants in this program have expressed doubt that the eligibility test is in the disjunctive. Unless clarified now, this issue will cause needless delay in the review process and potential rejection of applications from otherwise qualifying borrowers.</p> <p>2. EBITDA Test in Para. 5(iii). Amend paragraph 5(iii) in the Eligible Loan section. The current test is based, in part, on the applicant's 2019 EBITDA. We suggest using an average of the applicant's EBITDA over the three prior years (2017-19). This would give the lender a better view of the applicant's business performance and credit capacity. This change could be a replacement calculation or an alternative one, in which case the higher of the two numbers (2019 EBITDA or 2017-19 average EBITDA) would be used.</p> <p>Thank you for your consideration. Please do not hesitate to contact us with questions.</p> <p>D. E. (Ed) Wilson, Jr. &amp; Laura R. Biddle</p>
4/16/2020 4:57:00 PM	PIO (Email from	Roman	Brandon	brandon.roman@sqirepb.com	Squire Patton Boggs (on behalf of non-bank financial firms)	<p>The maximum loan size limitations of 4x MSNLF and 6x MSELF EBITDA minus outstanding debt and committed, undrawn facilities provide no incremental capital to NBFFs. NBFFs require significantly more debt for each dollar of equity to fund consumer loans efficiently. The \$25M MSNLF/\$150M MSELF maximum loan limitations are inadequate for NBFFs whose primary capital need is for continued funding of consumer loans.</p> <p>The requirement that MSELF loans be in place prior to April 8 significantly limits the utility of the program. NBFFs typically fund their business with receivables-based loans, with limited, or no, corporate indebtedness.</p> <p>The 5% participation requirement for MSLP eligible lenders limits expansion of borrowing capacity. Most companies will have fully drawn on existing credit capacity in anticipation of a business disruption, and lenders are unlikely to increase their exposure to facilitate new loans. Including undrawn lines of credit in the maximum loan size calculation further limits NBFFs total borrowing capacity and ignores that these lines are at significant risk of being terminated.</p> <p>The term loan structure requires companies to draw funds today without regard to the timing of the need for capital. This increases the borrowing cost and limits the ability of the facility to meet future needs as they arise.</p> <p>Consumer loan funding is NBFFs' principal need for capital and is inadequately addressed by the MSLP.</p>
4/16/2020 4:57:00 PM	PIO (Email from	Paul	Elizabeth	epaul@birminghambusinessalliance.com	Birmingham Business Alliance	<p>To whom it may concern:</p> <p>Thank you for your work to provide support for our crucial small and mid-sized businesses during this time. The "Main Street" program will provide much needed relief and additional options for aid for struggling businesses that need help to stay afloat and support our economy.</p> <p>We ask that relief be extended to all of our crucial businesses and organizations, including non-profits, both 501(c)(3)s and 501(c)(6)s; institutions of higher learning; and minority-serving institutions.</p> <p>If these organizations are unable to survive, the path to recovery for our hard-hit Main Street economy will be even more difficult.</p> <p>Sincerely,  The Birmingham Business Alliance</p>

Main Street Lending Program Comments

4/16/2020 4:59:00 PM	PIO (Email from	Phan	M	Personal Email Address	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>
4/16/2020 12:00:00 AM	PIO (Email from	Bucher	Sean	sean@theblock.me	<p>Please consider minimum loan amounts below 1 million dollars. If you are truly looking to help small businesses you must consider setting a lower minimum loan amount.</p> <p>As you can see, the EIDL and PPP may not stay funded long enough to help most of Main Street. Lending to true small businesses (with annual revenue averaging \$400,000 or more) is the best way to ensure that your investment in the future of American enterprise is dispersed in a way that minimizes risk to taxpayers while maximizing the potential of our great entrepreneurs and community leaders.</p> <p>Please consider lending minimums appropriate for the majority of America's small businesses. Most of us will not qualify for \$1 Million.</p>
4/16/2020 5:00:00 PM	PIO (Email from	Nash	Marlo	marlo.nash@st-francis.org Saint Francis Ministries	<p>Saint Francis Ministries is a national and international organization that is headquartered in Salina, Kansas. Rooted in the Episcopal tradition, Saint Francis is an independent not-for-profit with a mission to provide hope and healing through a multi-faceted child and family services ministry in six states and around the globe. We provide child welfare case management, foster care homes, youth residential programs, and mental health and substance use treatment services.</p> <p>We request that the Main Street Loan Program (MSLP):</p> <ul style="list-style-type: none"> <li>*Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5 year amortization;</li> <li>*Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>*Defer payments up to two years after a direct loan is made;</li> <li>*Begin employee retention provisions on the date that loan funding is received by the borrower;</li> <li>*Define "workforce as full-time employees or full-time equivalents in workforce restoration and retention provisions.</li> </ul> <p>Nonprofits are the third largest employer in our nation's economy. Many are essential partners to public agencies in providing the vital human services that keep people and communities safe and stable. Our recommendations to the MSLP will help keep nonprofits financially strong so we can meet today's needs and still be there in the future when many of our services will be needed even more. In the toughest times, we do the toughest work.</p>



Main Street Lending Program Comments

4/16/2020 5:01:00 PM	PIO (Email from	Jones	Collin	collin.jones@cumulus.com	<p>Dear Secretary Mnuchin and Chairman Powell,</p> <p>Cumulus Media is the second largest radio broadcaster in the US by number of stations and the third largest by revenue; as well, we operate the country's largest radio network, Westwood One, which represents 8,000 affiliate stations in addition to our own, and we own and manage a number of digital properties. We also employ over 4,500 full-time and part-time personnel who work tirelessly to deliver essential news and information and entertainment content across all our platforms to serve the public interest and reach over 250 million listeners every month who depend on us for that content.</p> <p>As you are no doubt aware, the radio industry has been drastically impacted by the COVID-19 crisis given the crisis-induced reduction in advertising spend, which makes up more than 90% of our revenue, and, specific to radio, the dramatic suppression of commuter traffic which has decimated "drive-time-radio," a key component of radio's listenership base. As a leading radio broadcaster, we are suffering significantly from these effects.</p> <p>We have reviewed the requirements published by the Treasury Department for both the Main Street New Loan Facility ("MSNLF") and the Main Street Expanded Loan Facility ("MSELF"), and we have several comments and suggestions for clarification under separate cover.</p> <p>Please see the email titled "Main Street Lending - Cumulus Media Comments" - sent on 4/16/20 at approximately 5:00 PM ET.</p>
4/16/2020 5:01:00 PM	PIO (Email from	Cleary	John	john.cleary@dentons.com	<p>We provide here comments regarding the term sheets released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility and the Main Street Expanded Loan Facility to support lending to small and medium-sized businesses ("Purpose").</p> <p>Required Attestations.</p> <p>With exception for the attestations regarding compensation, stock repurchase, and capital distributions, the Term Sheets do not require attestation that an Eligible Borrower would comply with other requirements set forth in Section 4003(c)(3)(A)(ii) of the CARES Act. Many small and medium-sized businesses could be excluded from access to the Programs if required to make other attestations such as the certifications required under section 4003(c)(3)(D)(i) of the CARES Act. Please confirm that, to support the Purpose, the certifications required under section 4003(c)(3)(D)(i) of the CARES Act do not apply to an Eligible Borrower under the Main Street Program and Expanded Main Street Program.</p> <p>The Term Sheets provide little guidance as to the covenants (financial and otherwise) and other terms and conditions that would be required of Eligible Borrowers, and do not clarify important application, approval and documentation issues related to Eligible Loans. Please confirm that, to support the Purpose, guidance will provide consistent, clear and limited terms and conditions for application, approval, documentation and terms for Eligible Loans.</p>

Main Street Lending Program Comments

4/16/2020 5:03:00 PM	PIO (Email from	Thel	Christopher	christopher.thel@dentons.com	Dentons Cohen & Grigsby P.C.	<p>April 16, 2020 Re: Main Street Lending Dear Sir or Madam:</p> <p>We respectfully provide below certain comments for consideration by the Federal Reserve System (&amp;quot;Federal Reserve&amp;quot;) and U.S. Department of the Treasury (&amp;quot;Treasury&amp;quot;) regarding the term sheets (&amp;quot;Term Sheets&amp;quot;) released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility (the &amp;quot;Main Street Program&amp;quot;) and the Main Street Expanded Loan Facility (the &amp;quot;Main Street Expanded Program&amp;quot; and, with the Main Street Program, the &amp;quot;Programs&amp;quot;) to support lending to small and medium-sized businesses (&amp;quot;Purpose&amp;quot;). Capitalized terms used but not defined in this comment have the meanings given in the Term Sheets.</p> <p>The Term Sheets mandate that the limitation on certain employee compensation at section 4004 of the CARES Act apply for the term of the Eligible Loan and 12 months after the repayment of the Eligible Loan. Total compensation is defined as including salary, bonuses, awards of stock and other financial benefits provided to an officer or employee.</p> <p>Many small and medium-sized businesses that utilize incentive equity plans could be excluded from access to the Programs depending on how incentive equity is valued. To support the Purpose, the compensation conditions should be revised or qualified to permit such businesses that utilize incentive equity plans to have access to Eligible Loans.</p> <p>Very truly yours, Chris Thel, Dentons Cohen &amp; Grigsby P.C.</p>
4/16/2020 5:04:00 PM	PIO (Email from	Deckard	Hilary	hilarydeckard@hscfs.org	Hathaway Sycamores Child and Family Services	<p>I'm associated with a public nonprofit organization in CA providing public resources for many who need them. I'm advocating the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to provide the following measures:</p> <ul style="list-style-type: none"> <li>oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>oPayments should not be due until two years after a direct loan is made</li> <li>oEmployee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>oIn any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents</li> </ul> <p>Additionally, we do not have the Paycheck Protection Program that will allow us to retain employees critical in supporting needed services and be able to manage implications for current COVID-19 crisis.</p>
4/16/2020 5:04:00 PM	PIO (Email from	Mitchel	Benjamin	mitchelc@fccare.org	Friendship Community Care	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> <li>In implementing any workforce restoration and retention provisions, &amp;quot;workforce&amp;quot; should be defined as full-time employees or full-time equivalents.</li> </ul>

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 5:05:00 PM	PIO (Email from	Casa	Gian-Carl	gcasa@ctnonprofitalliance.org	CT Community Nonprofit Alliance	<p>The CT Community Nonprofit Alliance (The Alliance) is the statewide association of community nonprofit in Connecticut.</p> <p>I submit the following comments on behalf of the many nonprofit organizations who have been excluded from the critical benefits of the Paycheck Protection Program, simply because they employ more than 500 in their workforce. The Paycheck Protection Program contains loan forgiveness provisions that are critical to these organizations, and necessary to help ensure they will be able to continue to provide services during the crisis and assist with our nation's recovery efforts when the crisis is over.</p> <p>As you proceed, we request that the program include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization. In addition, please provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts. We recommend that the payments should not be due until two years after a direct loan is made.</p> <p>As you are likely aware, employee retention has been a critical concern for nonprofit providers. We recommend that the employee retention provisions should begin on the date that loan funding is received by the borrower. Finally, we recommend that upon implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 5:05:00 PM	PIO (Email from	Hiler	Kristin	k.hiler@newamericanpathways.org		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:06:00 PM	PIO (Email from	Suttle-Field	Kay	kay@ywcaustin.org	YWCA	<p>I urge you to INCLUDE non-profits that serve in the social services sector in the current Main Street Covid-19 relief package. These organizations are the lifeblood of the communities they serve providing essential services to the most vulnerable people in a community. Additionally, these non-profits, such as the over 200 affiliates of the YWCA USA are in turn employers in the markets they operate in. These organizations, by mandate of their non-profit status and their oversight governance are the MOST efficiently run organizations that perennially DO THE MOST with the operating dollars they have. To EXCLUDE these essential organizations is a grave misstep at a time when they are MOST needed by the communities they serve.</p>
4/16/2020 5:06:00 PM	PIO (Email from	Rehbock	Elke	Elke.rehbock@dentons.com	Dentons US LLP	<p>We provide here certain comments for consideration regarding the term sheets for the Main Street New Loan Facility (the "Main Street Program") and the Main Street Expanded Loan Facility (the "Main Street Expanded Program"). The Main Street Expanded Program provides for collateral securing an Eligible Loan, whether pledged under the original terms of the Eligible Loan or at the time of upsizing, to secure the loan participation on a pro rata basis. If the SPV shares "pro rata" in collateral securing the existing and the upsized loan, it may dis-incentivize banks from lending under the Main Street Expanded Program. For instance, if an Eligible Lender with existing secured loans of \$100M outstanding to an Eligible Borrower would be required, in connection with an upsized loan of \$20M in which the SPV would have a 95% participation, to permit the SPV to share:</p> <ul style="list-style-type: none"> <li>- the existing collateral, it might discourage Eligible Lenders from lending under the Main Street Expanded Program and favor the Main Street Program if they were permitted to choose what to offer; and/or</li> <li>- in proceeds of existing collateral, the allocation of such proceeds would need to be limited to the amount of the participation (which we understand the intent of the term sheet to be).</li> </ul> <p>To support broad participation, this framework should be revised, clarified or qualified to ensure the availability of loans under the Main Street Expanded Program.</p>
4/16/2020 5:07:00 PM	PIO (Email from	Word	Jessica	Personal Email Address		<p>Please include nonprofits in the Main Street lending program. Nonprofits are a vital part of communities and they not only support thier own employees but also support community resilience and rebuilding efforts by providing services to those who are the most impacted in communities. Leaving these organizations out of this funding will have a large negative impact upon communities.</p>
4/16/2020 5:08:00 PM	PIO (Email from	Mauer	Dan	dmauer@cw-a-union.org	Communications Workers of America (CWA)	<p>The Fed should revise the term sheet to conform with the terms of Section 4003(c)(3)(D) of the CARES Act, particularly those terms designed to protect American workers' jobs, pay and benefits. These include the prohibition on loan recipients offshoring work, and the requirements that loan recipients use the money to maintain a high percentage of payroll and remain neutral whenever employees consider whether to engage the employer in collective bargaining for their mutual aid and benefit. The current term sheet ignores one safeguard after another that Congress enacted to ensure these funds are utilized for the benefit of working people.</p>

Main Street Lending Program Comments

4/16/2020 5:08:00 PM	PIO (Email from Denton	Denton	Neal	Neal.Denton@ymca.net	YMCA of the USA	<p>On behalf of YMCA of the USA, the resource office for the nation's 2,600 YMCAs, I urge you to include nonprofits in the Main Street lending program. We request that the program:</p> <p>Model the SBA PPP program approach by forgiving loan amounts that meet certain criteria around employment.          Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization          Give priority to 501(c)(3) charitable nonprofits responding to the COVID-19 crisis.          Provide that payments shall not be due until two years after a direct loan is made          Stipulate that employee retention provisions begin on the date that loan funding is received by the borrower          Define "workforce" as full-time employees or full-time equivalents for the purposes of implementing any workforce restoration and retention provisions          [FULL LETTER SUBMITTED TO email address]</p>
4/16/2020 5:08:00 PM	PIO (Email from Russell-Slavin	Russell-Slavin	Terra	tslavin@lgbtcenter.org	Los Angeles LGBT Center	<p>Re: Ensuring nonprofits have access to the Main Street Lending Program</p> <p>Since 1969, the Los Angeles LGBT Center (Center) has cared for, LGBT individuals and families in Los Angeles and beyond. Today the Center's nearly 800 employees provide services for more LGBT people than any other organization in the world. The Center is one of the few Federally Qualified Health Centers in the nation with providers who specialize in medical care for the LGBT people and people living with HIV/AIDS. In addition to our health services, we offer residential services for youth and seniors, drop-in services for homeless persons, meal services, and so much more. Across all of our programs, we see over a half a million client visits each year. In this time, the need for our services has never been greater, which is why the Center was deeply concerned to learn that the Federal Reserve's new "Main Street" lending facility would exclude nonprofits, the very organizations on the front lines responding to this pandemic. This is a particularly devastating blow for organization likes our who are currently ineligible for the Paycheck Protection Program. Given the current financial crisis and loss of revenue, the Center, may be forced to shrink our services, meaning thousands could go without care. Nonprofits like ours need access to these government backed revenue streams and loan programs. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.</p>
4/16/2020 5:09:00 PM	PIO (Email from Purser	Purser	Craig	lknight@nbwa.org	National Beer Wholesaler Association	<p>I am writing to raise an issue that will impact many of the nation's pass-through businesses, including the majority of over 3,000 family-owned beer distribution businesses represented by the National Beer Wholesalers Association.</p> <p>Federal guidance should include and allow for S corporation access to the MSLP loan program during this difficult time. The inclusion of certain capital distribution limitations or restrictions could prevent S corporations from participation in this much-needed loan program. To address this concern, NBWA recommends clarifying capital distribution attestation requirements for the loan program by addressing Section 4003(c)(3)(D)(i)(vii) of the CARES Act with an exception for pass-through distributions that are made to finance taxes owed on business income, in a manner similar to the following:</p> <p>The Eligible Borrower must attest that it will follow compensation, stock repurchase, and capital distribution restrictions that apply to direct loan programs under 4003(c)(3)(D)(i)(vii) of the CARES Act. These restrictions do not apply to pass-through entities that make distributions to pay taxes attributable to income earned by the eligible entity.</p> <p>NBWA members are primarily structured as S corporations. Correcting this presumed unintended consequence for pass-throughs will help ensure that these businesses - many of which are family-owned and family-operated - are allowed to participate in the MSLP loan program.</p>
4/16/2020 5:10:00 PM	PIO (Email from Dougherty	Dougherty	Michael	michael.dougherty@dentons.com	Dentons Cohen & Grigsby P.C.	<p>We respectfully provide below certain comments for consideration regarding the term sheets ("Term Sheets") released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility (the "Main Street Program") and the Main Street Expanded Loan Facility (the "Main Street Expanded Program" and, with the Main Street Program, the "Programs") to support lending to small and medium-sized businesses ("Purpose"). Capitalized terms used but not defined in this letter have the meanings given in the Term Sheets.</p> <p>The Term Sheets would require attestation that an Eligible Borrower must commit to refrain from repaying other debt of equal or lower priority, with the exception of mandatory prepayments, unless the Eligible Borrower has first repaid the Eligible Loan in full.</p> <p>Many small and medium-sized businesses have existing commitments related to unsecured third-party debt the terms of which would conflict with such required attestation, and thus such businesses could be excluded from access to the Programs. To support the Purpose, these attestations should be revised or qualified to permit (a) regularly scheduled payments of interest and principal on existing debt, including payment at maturity (in addition to mandatory prepayments), and (b) the refinancing of such debt in the event that such business determines that doing so is in its best interests economically and financially.</p>

Main Street Lending Program Comments

4/16/2020 5:11:00 PM	PIO (Email from	Graham	Scott	scott.graham@dentons.com	Dentons Cohen & Grigsby P.C.	<p>We respectfully provide below a comment for your consideration regarding the term sheet ("Term Sheet") released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility (the "Program") to support lending to small and medium-sized businesses ("Purpose"). Capitalized terms used but not defined in this comment have the meanings given in the Term Sheets.</p> <p>The Term Sheets limit Eligible Business to businesses with up to 10,000 employees or up to \$2.5B in 2019 annual revenues, created or organized in the United States or under the laws of the United States with significant operations in and a majority of its employees based in the United States.</p> <p>Many small and medium-sized businesses could be excluded from access to the Program based on affiliation and consolidation issues. To support the Purpose, eligibility determinations for a business should be made with reference to the entity applying as the Eligible Borrower and its direct and indirect subsidiaries without affiliation or consideration of its (i) ownership by and/or affiliation with other parent companies or entities (whether domestic or foreign) and (ii) affiliation with other foreign subsidiary entities, including, but not limited to, for purposes of calculating relevant headcount, headcount location, revenue, operational concentration, and jurisdictional status.</p>
4/16/2020 5:12:00 PM	PIO (Email from	Ingram	Mauri	mingram@whatcomcf.org	Whatcom Community Foundation	<p>Ensuring access to capital will be essential in late stage pandemic response and throughout the recovery phase. Nonprofits, institutions of higher learning and Minority-Serving Institutions are and will continue to play key roles in both. I urge you to include all three groups in the recently announced Main Street Lending program so that they are able to access the capital necessary to fulfill their essential roles and, in the case of the nonprofit sector, public and community serving missions. Thank you for your consideration.</p>
4/16/2020 5:12:00 PM	PIO (Email from	Sibbison	Heather	heather.sibbison@dentons.com		<p>We respectfully provide below certain comments for consideration by the Federal Reserve System and U.S. Department of the Treasury regarding the term sheets ("Term Sheets") released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility (the "Main Street Program") and the Main Street Expanded Loan Facility (the "Main Street Expanded Program" and, with the Main Street Program, the "Programs") to support lending to small and medium-sized businesses. Capitalized terms used but not defined in this letter have the meanings given in the Term Sheets.</p> <p>Eligible Borrowers.</p> <p>Please confirm that a Tribal business concern engaged in a trade or business and distinct from the Indian Tribal government that owns it, with, for example, its own Federal Employer Identification Number and employees, may be an "Eligible Borrower" under either of the Programs.</p> <p>Please confirm that a payment from a Tribal business concern to a Tribal government or government instrumentality, for example, for the reimbursement of public health and safety services provided by a Tribal government or for any of the other five permitted uses of net gaming revenues from Tribal gaming under 25 U.S.C. § 2710(b)(2)(B), would not be considered "compensation, stock repurchase and capital distribution" payments or "dividends" or capital distributions with respect to the common stock of the eligible business" which are restricted by Section 4003(c)(3)(A)(ii) of the CARES Act and the Term Sheets.</p>
4/16/2020 5:14:00 PM	PIO (Email from	Shaw	Linn	linn.s@kpaviation.net	KP Aviation & Affiliates	<p>CONTEXT: KP Aviation &amp; Affiliates is a profitable, modestly-leveraged aftermarket aviation parts operating company organized as a pass-through entity.</p> <p>1)TAX DISTRIBUTIONS PERMISSIBLE: Please confirm that to the extent tax distributions (A) are set forth prior to April 8, 2020 (unless they are for newly formed entities) in governing documents (e.g., LLC Operating Agreements) and (B) not prohibited under any credit agreements, they shall be permissible for pass-through entities (i.e., they are not otherwise restricted by the "no dividends" rule.) Otherwise, the Main Street Lending Program would give rise to phantom income for the owners of borrowers, like KPA, organized as pass-through entities.</p> <p>2)Please confirm the parameters for using its cash profits or new debt proceeds (other than proceeds from the Main Street Lending Program) to retire any of its outstanding debts. This would allow KPA to retire higher cost fixed obligations - provided that such repayment is not financed by the Main Street loan proceeds.</p>

Main Street Lending Program Comments

4/16/2020 5:14:00 PM	PIO (Email from	Manworren	Julie	julie.manworren@voamn.org	Volunteers of America of MN & WI	<p>Volunteers of America of MN and WI provides a wide range of services deemed essential. We have a shoestring budget but exceed the 500-employee threshold in the CARES ACT.</p> <p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization.</p> <p>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts.</p> <p>Payments shall not be due until two years after a direct loan is made.</p> <p>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</p> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p> <p>Many nonprofits employ more than 500 employees and have not been able to access the Paycheck Protection Program, which contains loan forgiveness provisions that are critical to our organizations, and necessary to help ensure we will be able to continue to provide essential services during the COVID - 19 crisis and assist with our nation's recovery efforts when the crisis is over.</p>
4/16/2020 5:14:00 PM	PIO (Email from	Eremita	Linda	leremita@bu.edu	Messiah College	<p>It is critical that the Main Street Lending Program include colleges &amp; universities. I am a Trustee of Messiah College who already discounts its tuition more than 40%, and is experiencing a \$7 million dollar shortfall this semester related to the COVID-19 crisis. The COVID-19 crisis has caused our College to furlough approximately 250 people, in addition to other employees who not be able to be employed this Fall, should dormitories remain empty and other disruptions to campus eliminate the need for their employment. Messiah has been serving students for more than 100 years and desirous of continuing to educate students for the next several hundred years.</p>
4/16/2020 5:14:00 PM	PIO (Email from	Hammett	Donald	donald.hammett@dentons.com	Dentons US LLP	<p>We provide here comments on the term sheets ("Term Sheets") released by the Federal Reserve for the Main Street New Loan Facility and the Main Street Expanded Loan Facility (the "Programs") to support lending to small and medium-sized businesses ("Purpose").</p> <p>The Term Sheets require attestation that an Eligible Borrower not pay dividends with respect to its common stock until 12 months after the Eligible Loan is no longer outstanding, as required in section 4003(c)(3)(A)(ii)(II) of the CARES Act.</p> <p>A. Some companies, such as real estate investment trusts and regulated investment companies, are required by federal law to make annual distributions of dividends in order to maintain their tax status. The limitation on the payment of dividends would jeopardize the tax status of these entities (and would therefore make these loans unavailable for these entities). For this reason, these entities should be excluded from the limitations on the payment of dividends under section 4003(c)(3)(A)(ii)(II) of the CARES Act.</p> <p>B. Many businesses could be excluded from access to the Programs based on these attestations. To support the Purpose, these attestations should be qualified to permit dividends and other distributions (a) for designated purposes including (i) tax distributions and guaranteed payments for flow through entities, and (ii) in connection with a sale of business transaction, and (b) upon or following the time that the Eligible Loan is no longer outstanding.</p>
4/16/2020 5:15:00 PM	PIO (Email from	McCracken	Shannon	smccracken@ancor.org	ANCOR	<p>As the Treasury Dept works to create a program under CARES Act section 4003(c)(3)(D) to provide financing to banks &amp; other lenders to make loans to nonprofits and other mid-size business 500-10,000 employees, we request they: Include 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5 yr amortization; Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts; Payments shall not be due until 2 years after a direct loan is made; Employee retention provisions should begin on the date that loan funding is received by the borrower; In implementing any workforce restoration &amp; retention provisions, "workforce" should be defined as full-time employees or equivalents. Many nonprofits employ more than 500 employees and have not been able to access the Paycheck Protection Program, with loan forgiveness provisions which are critical &amp; necessary to help ensure they will be able to continue to provide services during the crisis &amp; assist with our nation's recovery efforts when the crisis is over. Nonprofits are the third largest employer in our nation's economy and valued problem solvers. Our members provide essential supports to people with intellectual and developmental disabilities. The recommendations above will help to keep these organizations financially strong and allow them to continue to meet the immediate needs of their communities while planning for the future when many of their services will be needed most.</p>

Main Street Lending Program Comments

4/16/2020 5:17:00 PM	PIO (Email from	McVinua	Nicole	nmcvinua@urbanpathways.org	Urban Pathways	<p>As a nonprofit organization, Urban Pathways urges the Federal Reserve to either include nonprofit organizations in the Main Street Lending Program, or to create a separate lending program for organizations with more than 500 staff who are ineligible for the CARES Act PPP/SBA 7(a) loan program.</p> <p>Private nonprofits form a large industry (larger than the airline industry) and employ many people nationwide. Nonprofit social service organizations are playing a significant role in the current crisis, taking care of society's most vulnerable populations, including the homeless, the elderly, and people with disabilities. If these organizations were to close, the most vulnerable in our communities would be at risk. With many nonprofits already in poor financial straits prior to the Covid-19 epidemic and now enduring increased costs associated with continuing essential services and/or changing their programs to provide a needed essential service, organizations are being pushed to their brink. The federal government must provide the same level of relief to nonprofit organizations as they are to for-profit businesses, especially in light of the essential role they are playing.</p> <p>Due to years of chronic under-funding by local governments, many human service organizations have merged or consolidated into organizations with well over 500 staff members. For the same reasons above, nonprofits with more than 500 staff members must also be able to access zero-interest and forgivable loans.</p>
4/16/2020 5:17:00 PM	PIO (Email from	Kudenholdt	Stephen	steve.kudenholdt@dentons.com	Dentons US LLP	<p>April 16, 2020 Re:Main Street Lending</p> <p>Dear Sir or Madam:</p> <p>We respectfully provide below certain comments for consideration by the Federal Reserve System ("Federal Reserve") and U.S. Department of the Treasury ("Treasury") regarding the term sheets ("Term Sheets") released by the Federal Reserve on April 9, 2020 for the Main Street New Loan Facility and the Main Street Expanded Loan Facility.</p> <p>Required Documentation.</p> <p>The Term Sheets provide little guidance as to role of the Federal Reserve in approving the proposed form of Note, Loan Agreement and Participation Agreement.</p> <p>Please indicate: 1) whether the Federal Reserve will require Eligible Lenders to submit their form of Note and Loan Agreement for approval, and 2) whether the Federal Reserve will specify a form of Participation Agreement, or require Eligible Lenders to submit their form of Participation Agreement for approval.</p> <p>SOFER.</p> <p>The Term Sheets state that the adjustable rate will be based on SOFR, with little further detail. Eligible Lenders may wish to use an average of SOFR, rather than daily SOFR.</p> <p>Please indicate that an Eligible Lender may base the rate for an accrual period on an average of SOFR over an observation period (such as 30 days), determined either in advance or in arrears. Also please indicate that an Eligible Lender may use either simple or compound averaging,</p> <p>Very truly yours,</p> <p>Stephen S. Kudenholdt, Dentons US LLP</p>

Main Street Lending Program Comments

4/16/2020 5:18:00 PM	PIO (Email from	Kollman	Max	mkollman@museumofdesign.org	MODA	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:19:00 PM	PIO (Email from	Rubenstein	Jennifer	jennifer@keeplouisvilleweird.com	Louisville Independent Business Alliance	<p>I write to submit the following feedback during the comment period for the proposed Main Street Lending Program.</p> <p>Many business owners are currently unable to pay rent on the storefront their business occupies. These businesses are suffering from forced closures of all but essential businesses due to the Covid-19 outbreak. These business owners are stalwart tenants who have rarely, if ever, caused loss for their landlords. But in these unprecedented times, tenants can't pay rent, and landlords may find it difficult to make mortgage payments. Worse, business tenants worry they will be evicted--adding future relocation to the rising costs of maintaining a business which is ceased serving customers during this pandemic.</p> <p>In cases where the bank providing Main Street Lending funds are also mortgage servicers, the Fed should do more than encourage banks which are mortgage servicers to place consumers in short-term payment forbearance programs --the Fed should require it.</p> <p>In order to maximize employment beyond the PPP, brick and mortar businesses need assurance that they will not be pushed off of the very Main Street for which the bill is named.</p> <p>Whatever the method, the need to prevent the market disruption that will be caused by hundreds of thousands of "for rent" signs on American main streets is primary and can be prevented by requiring banks which are providing fed loans to relieve these mortgages, which are imperative to keep healthy Main Streets everywhere.</p>
4/16/2020 5:21:00 PM	PIO (Email from	El-Rayess	Tamer	tamer@continentalcompany.com	Continental Finance Company, LLC	<p>The maximum loan size limitations of 4x MSNLF and 6x MSELF EBITDA minus outstanding debt and committed, undrawn facilities provide no incremental capital to NBFFs. NBFFs require significantly more debt for each dollar of equity to fund consumer loans efficiently. The \$25M MSNLF/\$150M MSELF maximum loan limitations are inadequate for NBFFs whose primary capital need is for continued funding of consumer loans.</p> <p>The requirement that MSELF loans be in place prior to April 8 significantly limits the utility of the program. NBFFs typically fund their business with receivables-based loans, with limited, or no, corporate indebtedness.</p> <p>The 5% participation requirement for MSLP eligible lenders limits expansion of borrowing capacity. Most companies will have fully drawn on existing credit capacity in anticipation of a business disruption, and lenders are unlikely to increase their exposure to facilitate new loans. Including undrawn lines of credit in the maximum loan size calculation further limits NBFFs total borrowing capacity and ignores that these lines are at significant risk of being terminated.</p> <p>The term loan structure requires companies to draw funds today without regard to the timing of the need for capital. This increases the borrowing cost and limits the ability of the facility to meet future needs as they arise.</p> <p>Consumer loan funding is NBFFs' principal need for capital and is inadequately addressed by the MSLP.</p>



Main Street Lending Program Comments

4/16/2020 5:22:00 PM	PIO (Email from	Contreras	Armando	acontreras@ucp.org	United Cerebral Palsy	<p>To whom it may concern;</p> <p>Many nonprofits employ more than 500 employees and have not been able to access the Paycheck Protection Program, which contains loan forgiveness provisions critical to these organizations and necessary to help ensure they will be able to continue to provide services during the crisis and assist with our nation’s recovery efforts when the crisis is over.</p> <p>In the toughest times, nonprofits like United Cerebral Palsy do the toughest work. As the U.S. Treasury Department works to develop a program as directed under the CARES Act section 4003(c)(3)(D) to provide financing to banks and other lenders in order to make loans to nonprofits and other mid-size business with 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>• Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization with no prepayment penalty.</li> <li>• Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>• Ensure that payments shall not be due until two years after a direct loan is made with the loan period last for seven years</li> <li>• Employee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>• In implementing any workforce restoration and retention provisions, “workforce” should be defined as full-time employees or full-time equivalents</li> </ul> <p>The recommendations above will help to keep these organizations financially strong.</p>
4/16/2020 5:23:00 PM	PIO (Email from	Weinstein	Bruce	bruce.weinstein@genesis-fs.com	Genesis Financial Solutions, Inc	<p>The maximum loan size limitations of 4x MSNLF and 6x MSELF EBITDA minus outstanding debt and committed, undrawn facilities provide no incremental capital to NBFFs. NBFFs require significantly more debt for each dollar of equity to fund consumer loans efficiently. The \$25M MSNLF/\$150M MSELF maximum loan limitations are inadequate for NBFFs whose primary capital need is for continued funding of consumer loans.</p> <p>The requirement that MSELF loans be in place prior to April 8 significantly limits the utility of the program. NBFFs typically fund their business with receivables-based loans, with limited, or no, corporate indebtedness.</p> <p>The 5% participation requirement for MSLP eligible lenders limits expansion of borrowing capacity. Most companies will have fully drawn on existing credit capacity in anticipation of a business disruption, and lenders are unlikely to increase their exposure to facilitate new loans. Including undrawn lines of credit in the maximum loan size calculation further limits NBFFs total borrowing capacity and ignores that these lines are at significant risk of being terminated.</p> <p>The term loan structure requires companies to draw funds today without regard to the timing of the need for capital. This increases the borrowing cost and limits the ability of the facility to meet future needs as they arise.</p> <p>Consumer loan funding is NBFFs’ principal need for capital and is inadequately addressed by the MSLP.</p>
4/16/2020 5:24:00 PM	PIO (Email from	Lewis	Michael	michael.lewis@sidley.com	Sidley Austin LLP	<p>Dear Chairman Powell and Board Staff,</p> <p>I write on behalf of Par Pacific Holdings, Inc. (“PPHI”), an energy company in the refining, retailing, and logistics spaces. PPHI appreciates the opportunity to submit comments to the Board concerning the Main Street Lending Program. As currently contemplated by the term sheets for the Main Street Expanded Loan Facility and the Main Street New Loan Facility the Board published on April 9, we believe that the terms of these facilities do not optimally account for the ways in which some businesses operate, and thereby may inadvertently limit borrower access to the Main Street Lending Program and the loan amounts available to those borrowers. Therefore, we would respectfully suggest making five changes to the terms of these facilities, which we believe would enhance credit available to eligible businesses and allow lenders to better serve the policy aims for which Congress, the Treasury Department, and the Board have created the Main Street Lending Program. Our proposed changes and the rationale for them are set forth in a short comment letter that I am submitting by e-mail today. We appreciate the Board’s consideration of our requests.</p> <p>Regards,</p> <p>Michael D. Lewis Sidley Austin LLP</p>

Main Street Lending Program Comments

4/16/2020 5:25:00 PM	PIO (Email from Fergerson	Jamie	jamie@atlantapride.org	Atlanta Pride Committee	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:27:00 PM	PIO (Email from Smith	Theresa	Personal Email Address		<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>
4/16/2020 5:27:00 PM	PIO (Email from Davenport	Audrey	Personal Email Address	Soque St LLC	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:28:00 PM	PIO (Email from Lamb	John	jlamb@seattleymca.org	YMCA or Greater Seattle	<p>As a leader at the YMCA of Greater Seattle, I am writing to urge that nonprofits, especially those with more than 500 employees are eligible for the Main Street Loan Program. Nonprofits like ours have depleted our cash reserves addressing COVID-related community needs such as providing daycare services to first responders, and need financial support to return to regular operations during COVID recovery. Nonprofit organizations should be explicitly named as eligible for the Main Street Lending program. While the CARES Act was an important step in relief, more support is needed especially for organizations like ours with over 500 employees that are not eligible for the Paycheck Protection Program. We were forced to move 2,200+ of our employees (75%+) to standby status until we can re-open operations, and we are facing millions of dollars in losses this year.</p>
4/16/2020 5:29:00 PM	PIO (Email from Hinds	Elliot	ehinds@sheppardmullin.com	Sheppard Mullin	<p>Regarding a borrower's eligibility for Main Street Loans:</p> <ul style="list-style-type: none"> <li>oPlease confirm that the borrower's ownership structure will not be relevant (e.g., that having a sole proprietor, disregarded entity (for tax purposes), special purpose entity, or foreign ownership will not be disqualifying).</li> <li>oPlease confirm that there will not be any consolidation of the borrower (for purposes of the maximum employee count or revenue calculation) with parent companies, non-majority owned subsidiaries or sister companies.</li> <li>oPlease confirm whether and how a borrower should count employees held by or revenue generated by its majority-owned subsidiaries.</li> </ul> <p>If the Fed contemplates ownership or affiliation requirements, those requirements should be easily understood and applied, and preferably not akin to the restrictive and complex affiliation rules that apply in the SBA context.</p>
4/16/2020 5:29:00 PM	PIO (Email from ross	terri	Tross@queenscp.org	Queens Centers for Progress	<p>Please include the programs for people with developmental disabilities</p>

Main Street Lending Program Comments

4/16/2020 5:31:00 PM	PIO (Email from Joy	Joy	Susan	s.joy@ymcanc.org	YMCA of Northwest North Carolina	The YMCA of Northwest North Carolina has a long standing history of responding and meeting community needs. Impacting the lives of over 150,000 people in 7 counties, we have adapted our services to support our neighbors through the COVID-19 pandemic. Our Y is currently providing emergency child care to essential workers, distributing meals in at risk neighborhoods (over 5000 meals served so far), making thousands of wellness calls to seniors, and transitioning multiple branches for weekly blood drives. As a large non-profit, our dedicated staff are our most valuable resource. Prior to the pandemic and subsequent facility closures due to social distancing measures, our Y employed 1912 people (520 FTE), making us one of the largest employers in the region. We have since had to lay off 91% of our workforce, 1740 people. We are committed to serving northwest North Carolina and will continue working tirelessly to support those in need in our community despite recent layoffs and facility closures The CARES Act was a first step toward supporting nonprofits through the economic crisis, however we were not able to apply for the Paycheck Protection Program because of our size. We are projecting a \$2.5M loss in revenue between March 15th and June 30th and your support would ensure that the Y and other large non-profits can continue to provide urgently needed services for our communities. Thank you for looking into this matter and for your service to our nation in this time of crisis.
4/16/2020 5:31:00 PM	PIO (Email from Wood	Wood	David	david@gntv.info	GNTV Media Ministry	The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 5:32:00 PM	PIO (Email from Steineker	Steineker	Lee	Personal Email Address	Northeast YMCA	Please also ensure that nonprofit employers with between 500 and 10,000 employees are able to access the loan. Please also consider loan forgiveness for nonprofits, similar to the Paycheck Protection Program, to eliminate the burden of repayment in these uncertain times. Our communities need nonprofits like the Y now more than ever. Without additional resources, many nonprofit organizations will be lost to their communities, including YMCAs.  The YMCA of Greater Louisville employed 2100 staff prior to the COVID-19 pandemic and have had to furlough 95% of our staff. We were not able to apply for the Paycheck Protection Program because of our size. Without access to support, our Y will not be able to resume operations as we knew it or retain our staff. Despite our facilities being closed, our Y is providing child care for Health, Emergency and other essential services as outlined by the Governor's Office; Teen Shelter for homeless neglected/abused youth; Shelter for homeless men; Making hundreds of welfare calls; Offering thousands of virtual experiences for activity, engagement, and connectedness. Our Y, along with others, are committed to serving our communities throughout this pandemic and beyond. Our large delivery system serve many people from vulnerable situations and reduces the burden of government. Our Y has been a big help to our physical and mental health in our community. Thank you for your consideration!
4/16/2020 5:32:00 PM	PIO (Email from Heidrich	Heidrich	Greg	aweber@soa.org	Society of Actuaries	The SOA is a nonprofit professional organization that educates actuaries and provides objective research to assist our members and the public in making sound financial decisions. The SOA routinely collaborates with governmental bodies on our research efforts, including COVID-19 impact studies.  We urge you to include all nonprofits in the Main Street Lending Program. Associations and professional organizations provide a multitude of community services and benefits to society. Many in the nonprofit community operate on very lean budgets and have felt a significant financial drain through COVID-19 related losses.  Thank you very much for the consideration of our comments.  Sincerely, Greg Heidrich SOA Executive Director

Main Street Lending Program Comments

4/16/2020 5:32:00 PM	PIO (Email from	Hinds	Elliot	ehinds@shepardmullin.com	Sheppard Mullin	<p>At what date is the employee count measured for purposes of determining borrower eligibility? The borrower eligibility employee count test should have the flexibility to use different measurement dates, including the date of the Main Street loan application (which would meet the business where it presently stands as a result of the COVID-19 impact it has experienced).</p> <p>The borrower eligibility revenue test should have the flexibility to use either 2019 annual revenues or the trailing twelve months revenues (as of the date of its Main Street loan application). This measurement would meet the business where it presently stands as a result of the COVID-19 impact it has experienced.</p> <p>Will an eligible borrower under Section 4003(b)(1), (2) or (3) of the CARES Act also be eligible to receive Main Street loans?</p> <p>Assuming a borrower meets the other eligibility requirements established, please confirm that an Eligible Borrower can be any type of US entity form such as a trust (e.g., a REIT or a business trust), limited liability company, partnership, joint venture, quasi-governmental entity, nonprofit entity or tribal entity.</p>
4/16/2020 5:32:00 PM	PIO (Email from	Ables	Cristy	ables@fccare.org	Friendship Community Care	<p>As the Treasury Department works to create a program as directed under the CARES Act section 4003(c)(3)(D), to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <p>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</p> <p>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</p> <p>Payments shall not be due until two years after a direct loan is made;</p> <p>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</p> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>
4/16/2020 5:33:00 PM	PIO (Email from	Jahann	Sai	sjahann@tripactions.com	TripActions, Inc.	<p>I write on behalf of TripActions, Inc., a US-based corporate travel management technology company. The coronavirus pandemic is having a particularly devastating effect on the business travel sector in the United States.</p> <p>The Main Street Lending Program, which is intended to help support small and midsize businesses through the pandemic, effectively requires the borrower to have positive EBITDA for its loan to be eligible. However, growth-stage companies like TripActions have negative EBITDA due to our investment in product development, sales and marketing, and other growth functions ahead of revenue. Unfortunately, this has the consequence of excluding growth-stage companies from eligibility in the Program.</p> <p>There are other means of calculating appropriate loan sizes for the Main Street Lending Program while also assessing whether potential borrowers have the financial standing to ensure that taxpayer funds are protected: (1) Lending banks should apply industry-specific criteria such as debt/equity ratio, cash on hand, free cash flows over the loan term, and/or an assessment of operating costs and gross margins to evaluate borrower solvency and ability to service the loan. (2) Similar to the Paycheck Protection Program administered by the SBA, maximum loan amounts should be calculated based on payroll and other operating costs, instead of EBITDA.</p> <p>Please see our Letter submitted by email for additional information. Thank you for your consideration.</p>
4/16/2020 5:34:00 PM	PIO (Email from	Carney	Jared	jcarney@lightdalellc.com	McKinley Capital	<p>Hello, we have sent our comment letter to <a href="mailto:regs.comments@federalreserve.gov">regs.comments@federalreserve.gov</a> (it contains graphics). If you would please acknowledge receipt it would be very helpful. My colleagues and I are standing by to assist with this extremely important matter.</p> <p>Thank yo for your efforts on behalf of our country and the global financial system.</p> <p>Sincerely,</p> <p>Jared M. Carney Vice-Chairman McKinley Capital Management, LLC</p>

Main Street Lending Program Comments

4/16/2020 5:34:00 PM	PIO (Email from Weidner	Weidner	M. Robert	bweidner@msci.org	Metals Service Center Institute	<p>The leverage restrictions in the proposed terms sheets unfairly exclude companies that rely solely, or predominantly on asset-based revolving credit facilities. According to terms, the calculation of Maximum Loan Size for both New Loan facilities and Expanded Loan Facilities must include &amp;quot;committed but undrawn debt&amp;quot; as a component of leverage.</p> <p>Undrawn commitments are generally not accessible. They represent surplus collateral, or cushion, and banks impose significant penalties if this surplus is drawn down. These commitments should not count as debt.</p> <p>Left as is, the terms would preclude many metals service centers from participating. That obviously was not the intent of Congress.</p> <p>Our sector may be uniquely impacted by the &amp;quot;committed but undrawn debt&amp;quot; restriction because use of that credit method is widely used to finance inventory. We ask that you remove that condition in its entirety. Absent that, we urge the Federal Reserve to modify the Loan Facility Term sheets to allow borrowers to calculate their loan amounts using only the amount of &amp;quot;committed but undrawn debt&amp;quot; that is available to them without punitive bank responses.</p> <p>We have outlined two options for doing so in a full letter that was emailed.</p> <p>Our member companies operate in every state and collectively employ millions of workers. If these facilities cannot provide them with a lifeline, they are in danger of closing for good.</p>
4/16/2020 5:35:00 PM	PIO (Email from Hinds	Hinds	Elliot	ehinds@sheppardmullin.com	Sheppard Mullin	<p>A significant number of the target businesses for the Main Street Loan program access credit from non-Eligible Lenders. Completely excluding non-Eligible Lenders from the Main Street Loan program will significantly hamper the program's impact on the target market. To increase accessibility of the Main Street Loan program in a manner that balances the Fed's other considerations, please consider the following changes:</p> <ul style="list-style-type: none"> <li>oAn otherwise Eligible Loan should not be tainted because some or all of it passes through a non-Eligible Lender. Instead, consider eliminating or de-emphasizing the identity of the underlying loan originator so long as an Eligible Lender leads the expanded loan (which loan would be subject to the collateral sharing requirements described in the term sheets). However, if the Fed chooses not to eliminate the Eligible Lender origination requirement entirely, it should, at a minimum, loosen the requirement by allowing the following loans as Eligible Loans in the Main Street Expanded Loan Facility: <ul style="list-style-type: none"> <li>?*A loan that was originated by a non-Eligible Lender but was assigned in whole or in part to an Eligible Lender.</li> <li>?*A loan that was originated by a syndicate of lenders that includes one or more non-Eligible Lenders and one or more Eligible Lenders.</li> <li>?*A loan that was originated by an Eligible Lender that syndicated or assigned some or all of that loan to a non-Eligible Lender.</li> </ul> </li> </ul>
4/16/2020 5:35:00 PM	PIO (Email from Washburn	Washburn	Scott	swashburn@seattlemca.org	YMCA of Greater Seattle	<p>As a staff leader at the YMCA of Greater Seattle, I am writing to urge that nonprofits, especially those with more than 500 employees become eligible for the Main Street Loan Program. Nonprofits like ours have depleted our cash reserves addressing COVID-related community needs such as meal programs and child care for essential employees and require financial support to return to regular operations during COVID recovery. Nonprofit organizations should be explicitly named as eligible for the Main Street Lending program. While the CARES Act was an important step in relief, more support is needed especially for organizations like ours with over 500 employees that are not eligible for the Paycheck Protection Program. We were forced to move 2,200+ of our employees (75%+) to standby status until we can re-open operations, and we are facing millions of dollars in losses this year. Thank you for your consideration.</p>
4/16/2020 5:36:00 PM	PIO (Email from Hearn	Hearn	Marie	Personal Email Address	AS220	<p>Hi, I am so surprised that you have not included non profits in this stimulus package. Non profits and higher education programs employ thousands of people and are the heartbeat of their communities. My organization, AS220, are providing services to help to our low income artists with rent/housing . We also work with youth in foster care, youth at risk, some have been incarcerated, and pregnant moms, to name some of our work. Now more then ever with Covid -19 pandemic, we need your HELP!!! Please have non profits be a part of Main St stimulus! Thank you</p>

Main Street Lending Program Comments

4/16/2020 5:37:00 PM	PIO (Email from	Niedrauer	Melissa	Melissa@gntv.info		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:37:00 PM	PIO (Email from	case	blake	bcase@elevationres.com	Elevation Resources	<p>Under the Main Street Lending Program ("MSLP") currently being proposed, Eligible Borrowers cannot use the proceeds to repay other loan balances with the exception of mandatory principal payments. The upstream oil and gas industry is currently experiencing historic distress and retrenchment in the reserve-based loan market that is primarily serviced by banks that are Eligible Lenders under the MSLP. The size of a typical reserve-based loan is generally determined by its "borrowing base" or the present value of the estimated futures cash flows of the assets securing the loan. It is expected that the distress in the oil and gas market due to COVID-19 will lead to significant decreases in estimated borrowing bases during 2020 forcing borrowers to cure any borrowing base deficiency. The oil and gas industry lacks sufficient access to capital to cure these expected borrowing base deficiencies. We would recommend that uses of proceeds from MSLP loans also include curing borrowing base deficiencies in oil and gas reserve-based loans. This will provide the requisite capital and liquidity to maintain a healthy energy industry, support job preservation and tax revenue, and promote long-term U.S. energy independence.</p>
4/16/2020 5:37:00 PM	PIO (Email from	Bates	William	bill@gntv.info	GNTV Media Ministry	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as a for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:37:00 PM	PIO (Email from	Allen	Tony	tallen@desu.edu	Delaware State University	Main Street Lending
4/16/2020 5:37:00 PM	PIO (Email from	Hinds	Elliot	ehinds@sheppardmullin.com	Sheppard Mullin	<p>Please clarify the rules that apply to lender roles after a Main Street New Loan or Main Street Expanded Loan is funded such as:</p> <ul style="list-style-type: none"> <li>?*Allowing either an Eligible Lender or a non-Eligible Lender to acquire an assignment or participation interest in a Main Street New Loan or Main Street Expanded Loan.</li> <li>?*Allowing loan servicing responsibilities to be performed only by another Eligible Lender</li> <li>?*Confirming that the SPV's 95% risk participation in each Main Street New Loan or Main Street Expanded Loan is an undivided interest such that an assignment by an Eligible Lender of all or a portion of its loan will include a ratable assignment of the 95% risk participation.</li> </ul>

Main Street Lending Program Comments

4/16/2020 5:38:00 PM	PIO (Email from	Phillips	Steve	steven.phillips@us.dlapiper.com	DLA Piper	<p>1) Will the MSLP lenders agree to sign subordination agreements with existing secured lenders of the borrowers?</p> <p>2) Will the MSLP lenders be required to use any particular form of loan documentation?</p> <p>3) Will companies be able to distribute proceeds from sales outside the ordinary course of business, including sales of companies or divisions?</p> <p>4) There is no indication that the SBA "affiliation rules" applicable to the PPP apply, or any similar concept applies, to the MSLP with respect to its headcount, gross revenue or EBITDA calculations. Rather, in addition to the headcount, gross revenue and EBITDA requirements, each "Eligible Borrower" under the MSLP "must be a business that is created or organized in the United States or under the laws of the United States with significant operations in and a majority of its employees based in the United States" (see (1) the MSLP term sheets and (2) the CARES Act, Section 4003(c)(3)). Do any affiliation rules apply for purposes of determining eligibility? Do any affiliation rules apply in determining gross revenue, EBITDA and head count? Are the headcount, gross revenue and EBITDA calculations made separately for each entity (based on such borrower being a U.S. Business) rather than aggregated among affiliates?</p> <p>5) Are existing severance agreements or severance policies exempted from the limitations under the rules with respect to payment of severance?</p>
4/16/2020 12:00:00 AM	PIO (Email from	Williams	Melvin	mwilliams@streamlinemgmtno.com	Opulence	<p>I am looking for some clarity on the Main street lending program. I am a Ceo of a small company that meets the requirements for this program. I bank with a small regional bank has problems navigating the PPP program. I would like to find out there will be a list of bigger banks that I can go to to get approved for the loan? Does the bank have to approve the loan first before it goes to the Federal Reserve? And if so, what will be their requirements to ensure they are making ethical judgments on there end to help facilitate the process. Under some of the terms of the loan, there will be a 200 basis point charge over the lending rate. Will this loan be forgiven after the four years are can it be extended past the 4-year point.? Lastly, Inside of the "SPV" if we get the credit, does the small business have access to other lending facilities directly through the Federal Reserve?</p>
4/16/2020 5:39:00 PM	PIO (Email from	Santini	Angel	asantini@acacianetwork.org	Acacia Network	<p>As a non-profit organization that does not meet the size requirements under the Paycheck Protection Program and has more that 500 employees, it would be helpful the Main Street Loan Program to have a forgiveness provision - similar to PPP. Additionally, Fees/origination points should be waived for qualifying non-profit organizations.</p>
4/16/2020 5:40:00 PM	PIO (Email from	Phillips	Steve	steven.phillips@us.dlapiper.com	DLA Piper	<p>6) Is a borrower permitted to hire a new executive with pay over \$425,000 per year?</p> <p>7) There is no guidance indicating whether the headcount, gross revenue and EBITDA of two companies that form a joint venture would be aggregated for purposes of the MSLP. Joint ventures and the management companies should be treated as separate businesses, so that each company can apply for a loan under the MSLP using separate headcount, gross revenue and EBITDA for that U.S. Business. Are joint ventures that own and operate businesses (seniors housing, nursing homes, etc.) considered separate businesses from the hired management companies for MSLP purposes?</p> <p>8) It is noted the new loans will not require collateral, but if an Eligible Borrower has other more senior debt, are the MSLP loans subordinated to that existing senior debt obligations?</p> <p>9) The attestations required under the MSLP require an Eligible Lender to attest that the proceeds of an Eligible Loan will not be used to repay or refinance pre-existing loans or lines of credit made by the Eligible Lender. In addition, Eligible Borrowers must commit to refrain from using MSLP proceeds to repay debt of equal or lower priority (other than mandatory principal payments). Would approval be required by the senior lender for the MSLP loan?</p>

Main Street Lending Program Comments

4/16/2020 5:40:00 PM	PIO (Email from	McCally	John	john.mccally@nuveen.com	TIAA / Nuveen	<p>TIAA appreciates the opportunity to comment on the Federal Reserve’s Main Street proposal. TIAA is a savings and loan holding company and parent company of TIAA Bank, FSB. Accordingly, each of TIAA and TIAA Bank are eligible lenders under the proposal. Our initial comments are set forth below. We would be happy to further discuss these and other concerns in more detail. Please contact John McCally at john.mccally@nuveen.com or by phone at 202-210-5275.</p> <p><b>Eligible Lenders</b></p> <ol style="list-style-type: none"> <li>1. Wholly-owned subsidiaries of SLHCs and IDIs should be permitted to act as eligible lenders.</li> <li>2. Eligible lenders should be permitted to transfer Main Street loans to their affiliates and entities under common control or management.</li> </ol> <p><b>Eligible Loans</b></p> <ol style="list-style-type: none"> <li>1. LIBOR loans should be permitted with ARRC fallback language.</li> <li>2. Floating rate floors should be permitted by mutual agreement.</li> <li>3. Applicable margin for middle market loans and other asset classes should be set by reference to pre-Covid ranges, which often exceeded 400 bps.</li> <li>4. Leverage should be able to be increased beyond 6x for loans secured by equipment, inventory or other tangible or high-quality collateral (e.g. residential mortgages).</li> </ol> <p><b>Participations</b></p> <ol style="list-style-type: none"> <li>1. Participation terms should ensure sale treatment under applicable accounting principles. Applicable principles should include GAAP and/or statutory principles that apply to SLHCs doing business as insurance companies.</li> </ol>
4/16/2020 5:41:00 PM	PIO (Email from	Drinkwine	Marlene	mdrinkwine@lbcc.edu	Long Beach Community College District	<p>Long Beach City College (LBCC) strongly supports emergency funding opportunities for small business and we encourage inclusion of non-profits in any federal lending programs. LBCC is a regional leader in Economic Development, hosting programs such as the Los Angeles Regional Small Business Development Center Network (LA SBDC) and the Goldman Sachs 10,000 Small Businesses Program. Through the college’s small business COVID-19 response work, there has been an incredible demand for financial resources to small businesses, including a significant number of NGOs seeking assistance. Small businesses and NGOs make up a critical portion of our local economies and LBCC encourages our federal leaders to join us in taking action to support them.</p>
4/16/2020 5:41:00 PM	PIO (Email from	Stewart	Nathan	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation’s recovery from this unprecedented crisis depends on the success of our nation’s nonprofits.</p>
4/16/2020 5:41:00 PM	PIO (Email from	Allen	Tony	tallen@desu.edu	Delaware State University	<p>There has been confusion about the Main Street Lending program and whether non-profits are eligible because the current guidance is silent. At Delaware State University, we ask that the Federal Reserve update the guidance to clarify that non-profit private and public institutions of higher education, with direct borrowing authority, are eligible for the Main Street Lending program.</p> <p>We look forward to working with you on this and other essential loan programs as the Federal Reserve responds to the COVID-19 crisis. Thank you in advance for your consideration.</p>



Main Street Lending Program Comments

4/16/2020 5:41:00 PM	PIO (Email from	Poarch	Laura	Laura@gntv.info		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:41:00 PM	PIO (Email from	Sears	Jason	jsears@nwcenter.org	Northwest Center	<p>I ask that our legislators reflect on our economic sectors, and ask if growth comes at the expense of stability. By prioritizing our nonprofit community in this next round of support, we invest in our future as a nation, strengthening our communities. Without this prioritization, interest groups seeking to profit or deliver products or services that do not increase social value will capture equity and destabilize our health, education, and social support networks.</p> <p>Please require banks to prioritize nonprofits in accessing Main Street Lending funds, and make these loans as affordable as possible for all involved.</p> <p>Thank you.</p>
4/16/2020 5:43:00 PM	PIO (Email from	Tempel	Linda	Personal Email Address	HeartShare Human Services	<p>Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!</p>
4/16/2020 5:45:00 PM	PIO (Email from	Tarver	Kenton	Personal Email Address		<p>Please accept respectful commentary in support of the YMCA, by ensuring that nonprofits are explicitly named as eligible recipients of the Main Street Lending program. To ensure all YMCAs are covered, request consideration for nonprofit employers with between 500 and 10,000 to be able to access the loan, as many families throughout the nation depend on their services, and are supported regardless of their ability to pay.</p>
4/16/2020 5:45:00 PM	PIO (Email from	Johnson	Millie	millie@gntv.info	GNTV Media Ministry	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 5:45:00 PM	PIO (Email from	Chestnut	Sarah	sarah@inarf.org	INARF	<p>INARF's 72 member organizations that provide services to people with disabilities are facing skyrocketing costs for staffing, purchasing Personal Protective Equipment, cleaning and disinfecting homes of individuals served, etc. Unfortunately, they are not receiving additional funding to offset these costs, and many are nonprofits that employ more than 500 employees and have not been able to access the Paycheck Protection Program, which contains loan forgiveness. Without funding programs to support them during the pandemic, many will shutter and therefore be unable to continue to provide services during the crisis and assist with our nation's recovery efforts when the crisis is over.</p> <p>As the Treasury Department works to create a program as directed under the CARES Act, to provide financing to banks and other lenders to make loans to nonprofits and other mid-size business of between 500-10,000 employees, we request that the program:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization;</li> <li>Provide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts;</li> <li>Payments shall not be due until two years after a direct loan is made;</li> <li>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</li> </ul> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>

Main Street Lending Program Comments

4/16/2020 5:47:00 PM	PIO (Email from	Marion	Alexis	alexis@fcfox.org		I am writing to encourage the expansion of the CARES Act/Main Street Lending facility to include nonprofit organizations. Nonprofit organizations provide services to millions of people in communities around the country. Not only do they provide needed services, they also employ a significant portion of the American workforce. According to a 2019 report by the Center for Civil Society Studies at Johns Hopkins University, "nonprofits account for roughly one in 10 jobs in the U.S. private workforce, with total employees numbering 12.3 million in 2016." Since many of these organizations may not be otherwise eligible for the Paycheck Protection Program, it is especially important these organizations have other sources of support. We cannot make a significant portion of employers (and their employees) ineligible to receive aid, just because they are not "for profit" businesses. I urge you to consider expanding the eligibility of the Main Street Lending facility to include nonprofit organizations.
4/16/2020 5:47:00 PM	PIO (Email from	Johnson	Karen	karen.marshall@heartshare.org	HeartShare Human Services of NY	Please help us!
4/16/2020 5:47:00 PM	PIO (Email from	Velez	Edgardo	edgardo.velez@heartshare.org		Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!
4/16/2020 5:51:00 PM	PIO (Email from	Martin	Moriah	mmartin@seattleyymca.org	YMCA of Greater Seattle	Greetings- I am the Chief Human Resources Officer at the YMCA of Greater Seattle. As a professional in the non-profit sector and a community member, I urge that nonprofits, especially those with more than 500 employees, like the YMCA of Greater Seattle, are eligible for the Main Street Loan Program. While YGS and other Nonprofits have continued to meet community needs for homeless youth and the children of first responders, we and other Nonprofits like ours have depleted our cash reserves addressing COVID-related community needs. We need financial support to return to regular operations during COVID recovery. Nonprofit organizations must be explicitly named as eligible for the Main Street Lending program. While the CARES Act was an important step in relief, more support is needed especially for organizations like ours with over 500 employees that are not eligible for the Paycheck Protection Program. YGS was forced to move 2,200+ of our employees (75%+) to standby status until we can re-open operations, and we are facing millions of dollars in losses this year. This relief is important in allowing us to continue this important community work in greater Seattle.
4/16/2020 5:51:00 PM	PIO (Email from	Jean-Pierre	Rose	rose.jean-pierre@heartshare.org	HeartShare Human Services	Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!
4/16/2020 5:51:00 PM	PIO (Email from	Brown	Brady	Personal Email Address		We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 5:52:00 PM	PIO (Email from	Dauphin	Nathaniel	nathaniel@gntv.info	GNTV Media Ministry	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.  Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 5:52:00 PM	PIO (Email from	Cordero	Maribel	Personal Email Address	HeartShare Human Services of NY	Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!

Main Street Lending Program Comments

4/16/2020 5:53:00 PM	PIO (Email from	Zeno	George	gzeno@seattleymca.org	YMCA of Greater Seattle	As a 26-year veteran of nonprofit sector, I have seen the important work nonprofits play in binding and holding the safety net for so many people in our society. A number of larger nonprofits play critical roles in building the capacity of our local, state, and federal governments to reduce long term costs of care, break the cycle of poverty for families, and ensure the next generation of citizens are well prepared to produce in a thriving society. Nonprofits with an employee base larger than 500 MUST be included in eligibility for the Main Street Lending program or even more smaller nonprofits and businesses that they support will parish and governments will not have the right partners to scale solutions that reduce costs and save lives.
4/16/2020 5:55:00 PM	PIO (Email from	Baskette	Lesley	Lesley@umcmission.org	UM Commission Higher Education	We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New & Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.  As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.  We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.
4/16/2020 5:57:00 PM	PIO (Email from	Kwon	Hannah	hkwon@hscfs.org	Hathaways Sycamores Child and Family Services	I am affiliated with a non-profit organization providing behavioral health, child welfare services, housing support to individuals in California. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses. We request that the program include: -0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization -Priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts -Payments due at least two years after a direct loan is made -Employee retention provisions begin on the date that loan funding is received -"Workforce" should be defined as full-time employees or full-time equivalents Many non-profit organizations aren't able to access the Paycheck Protection Program , which is critical to ensure the continued provision of essential services during this crisis. Without increased access to loan programs intended to sustain payroll and retain employees, these mid-sized non-profit organizations are at financial risk, a circumstance that could leave thousands of individuals without timely access to needed care. This lack of access to care will lead many Americans to utilize more emergency services. This will drive up health care costs at a time when the health system is already strained caring for COVID-19 patients.
4/16/2020 6:00:00 PM	PIO (Email from	Korompilas	Angela	akorompilas@americanhotel.com	American Hotel Register Company	American Hotel has been in business since 1865. We are a key distributor to the hospitality industry which has been negatively impacted to unprecedented levels as a result of COVID-19. Our sales demand is down 90% versus the prior year and we have been forced to furlough approximately 80% of our workforce. Industry forecasts suggest that hospitality could be down as much as 50% in 2020, and American Hotel's sales directly correlate to industry performance. Bridging this financial burden until the industry rebounds is critical to our ongoing viability. Our feedback is focused around the maximum loan criteria, particularly the EBITDA leverage conditions. One year of EBITDA performance is not representative of a company's overall financial viability particularly in cases where that year was impacted by one-time events. In our case, we experienced significant implementation hurdles after investing heavily in a technology platform resulting in suppressed EBITDA results compared to our historical performance. Leveraging 2019 as a baseline drastically reduces our ability to benefit from the program. A more representative benchmark would be a 5-year historical average. We made the decision to invest in the business because we are critical to the hospitality supply chain and wanted to ensure we had the infrastructure in place to support it for many more years to come, and this decision is now impeding us from getting much needed financial relief as we navigate this crisis.
4/16/2020 6:00:00 PM	PIO (Email from	BERRIOS	VIVIAN	vivian.berrios@heartshare.org	HeartShare Human Svcs of New York	Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!
4/16/2020 6:01:00 PM	PIO (Email from	Todaro	Bobbi	bobbi@kuumbwajazz.org	Kuumbwa Jazz	Kuumbwa Jazz is a 501 (c) 3 located in downtown Santa Cruz, CA established in 1975. Due to COVID-19 since March 12th all sources of earned income have come to a halt. I am writing to ask that non-profits be considered for funding during this health and economic crisis.  Sincerely, Bobbi Todaro Executive Director Kuumbwa Jazz

Main Street Lending Program Comments

4/16/2020 6:04:00 PM	PIO (Email from	Delgado	Crispin	cdelgado@ncg.org	Northern California Grantmakers	On behalf of Northern California Grantmakers, we respectfully request that the Federal Reserve's "Main Street" lending facility include support for non-profit organizations. The lasting impact of the COVID-19 (Coronavirus) pandemic and its aftermath will have profound effects on communities throughout Northern California. As Californians continue to shelter in place, the effects of the economic fallout will be felt long after the order is lifted. Although the philanthropic and non-profit sectors are working together to mitigate the negative effects of this pandemic, it is not enough. The inclusion of non-profit organizations in the "Main Street" lending facility would support critical, community-based services that protect the health, safety, and well-being of our communities. Our non-profit partners are quickly adapting services to meet the emerging needs of our most vulnerable populations during this pandemic. Yet, many non-profit organizations have lost significant revenue due to canceled fundraising events, and are also incurring new costs by purchasing needed protective gear and equipment to work remotely. Demand for their services has grown and, with rising unemployment rates, even more demand is anticipated. The philanthropic sector alone cannot address this issue - we simply lack the size, scope, and scale of the federal government. Again, please consider the inclusion of non-profit organizations in the "Main Street" lending facility.
4/16/2020 6:04:00 PM	PIO (Email from	Tarver	Steve	starver@ymcalouisville.org	YMCA of Greater Louisville(KY)	<p>Please ensure nonprofits are explicitly named as eligible recipients of the Main Street Lending program especially those with &gt;500 employees. Please also consider loan forgiveness for nonprofits, similar to the Paycheck Protection Program, to eliminate the burden of repayment in these uncertain times.</p> <p>The YMCA of Greater Louisville serves over 100,000 people annually representing broad demographics and economic capacities and has served this region for 167 years. With a commitment to health and education equity, we have many partners including school systems, government entities, law enforcement, and health care.</p> <p>On Dec 18, 2019, we opened a new facility housing a YMCA and six other partners providing a continuum of health and education in a disinvested community. A public elementary school is to be added. It is the largest investment in west Louisville in decades and operated only 12 weeks prior to the emergency closing.</p> <p>Despite our facilities being closed, our Y is providing child care for Health, Emergency and other essential services; A Teen Shelter for homeless and neglected/abused youth; Housing for homeless men; Making hundreds of welfare calls; And offering thousands of virtual experiences. Even so, services have been seriously reduced. ~95% of our 2100 staff are furloughed.</p> <p>Our Y, and others, are committed to serving our communities throughout this pandemic and beyond. Thank you.</p>
4/16/2020 6:04:00 PM	PIO (Email from	Niehaus	Fred	fn@igsolutions.co	Policy Center for Public Health and Safety	<p>Most governors and mayors across the nation have deemed cannabis dispensaries and cultivation facilities as "essential" business functions and the economic benefits from these taxes and employment-generating businesses stand to assist in keeping the economy running in many areas.</p> <p>However, cannabis businesses as well as ancillary businesses who support them, have been excluded from the original CARES Act based upon earlier guidance prohibitions from the SBA. Across the country, many industry operators are suffering and without access to these federal lending programs could be forced to close or lay-off employees. At the same time, the greatest inequity is that these same companies are required to abide by the regulations stemming from the CARES Act.</p> <p>The cannabis industry generates billions of dollars in tax revenues, which lawmakers rely on, and almost 300,000 direct and indirect jobs. As being designated essential services, these operations are in many cases filling the void with tax revenues and employment opportunities while more traditional businesses are unable to maintain either in many cases.</p> <p>Please consider inclusion of the cannabis industry as eligible for Main Street Lending loans. We would also encourage that the minimum loan size be decreased to \$500,000, allowing for a more conservative capital structure for smaller businesses.</p>
4/16/2020 6:04:00 PM	PIO (Email from	Sinito	Frank	fsinito@mhmtd.com	The Millennia Companies	Please be advised comments were submitted to the designated email address April 16, 2020.
4/16/2020 6:05:00 PM	PIO (Email from	Dempster	Hazen	Hazen.Dempster@troutman.com	Troutman Sanders LLP	Troutman Sanders LLP and Pepper Hamilton LLP have submitted a joint comment letter by email.

Note: At the commenter's request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board's intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 6:05:00 PM	PIO (Email from	Pauls	Amy	amy.pauls@commercebank.com	<p>Will 1st year deferred interest accrue during the year? If so, when is it collected? Term sheet states "amortization" of P&amp;I is deferred for 1 year- are all payments deferred for 1 year? Is the loan amortized with outstanding and accrued interest over the remaining term?</p> <p>What pricing guidance is there? Many banks aren't yet ready for a SOFR index and have system limits. Is there data to calculate a suitable spread? Consider a minimum SOFR floor and/or LIBOR with a hardwire fallback.</p> <p>Full amortization/term of 4 years is quick.</p> <p>This unsecured debt shouldn't have a repayment schedule ahead of existing bank debt.</p> <p>Is a balloon payment at maturity on another term loan a permitted mandatory principal payment? What if that debt is with another lender? How would lender monitor payment of only mandatory principal payments?</p> <p>If we have a working capital line of credit and Borrower gets one of these loans from another lender, is Borrower prohibited from making payment on our working capital line?</p> <p>What diligence is needed to support a claim that financing need is pandemic-related? Will there be a standard Borrower Certification? Can Lender rely on Borrower representations?</p> <p>How does Borrower document reasonable efforts to maintain payroll and retain staff through the loan life? What if Borrower doesn't?</p> <p>What are Lender responsibilities to monitor/report noncompliance?</p> <p>Must the certifications be covenants in loan docs? How will covenants applying after loan repayment be treated?</p>
4/16/2020 6:06:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	<p>EBITDA Loan Sizing Test</p> <p>Problem - Unclear whether EBITDA is meant to be unadjusted without any addbacks or pro forma impacts included. Calculating EBITDA without taking into account adjustments and pro forma impact would prevent many companies from meeting the leverage tests as virtually all loan facilities provide for EBITDA on an adjusted basis. For companies that have made acquisitions or dispositions, this creates uncertainty in how EBITDA should be calculated.</p> <p>Solution - For the Expanded Loan Facility (ELF) leverage sizing test, have EBITDA include the same adjustments and pro forma treatment as under the existing loan facility. For the New Loan Facility (NLF) leverage sizing test, allow the lender and the company to agree on the addbacks and pro forma treatment to be included in EBITDA.</p> <p>Problem - Because many growth companies do not have positive EBITDA, without another test, most growth companies will be excluded from Main Street Loan Facility (MSLF).</p> <p>Solution - For private growth companies, provide a test that looks to a percentage of the most recent 409(A) valuation or post-money valuation from the most recent financing round. For public growth companies, provide a test that looks to a percentage of 52-week average market capitalization with the end date for the period covered by such test being a date before the start of the pandemic.</p>
4/16/2020 6:07:00 PM	PIO (Email from	Pei	Marianne	Personal Email Address	<p>Please include nonprofits in the Main Street Lending program.</p>
4/16/2020 6:09:00 PM	PIO (Email from	Akailvi	Syed Ghazi	ghazi.akailvi@livingwell.org	<p>Living Well Disabilities Services serves about 200 people, with disabilities, in 34 group homes. Direct Service Professionals (DSPs) are the heart of our services. The pay rates for these staff are already below some fast food vendors and retaining them is difficult. The COVID crisis has added further pressure on our organization.</p> <p>To ensure that our best DSPs continue to serve the people in our homes, we created a payroll incentive program which rewards them for working while safe and provides them with pay checks when out of leave. This is creating an unplanned deficit situation for the fiscal year. We could not benefit from the Paychex Protection plan, because we employer over 500 employees. Given this, we welcome and strongly support the effort underway to create a loan program for organizations that fit our size. We urge that the program contain the following features:</p> <ul style="list-style-type: none"> <li>Include a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization.</li> <li>Provide priority to 501(c)(3) nonprofits responding to COVID-19 relief efforts.</li> <li>Make payments two years after a direct loan is made.</li> </ul> <p>Employee retention provisions should begin on the date that loan funding is received by the borrower; and</p> <p>In implementing any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents.</p>

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4/16/2020 6:09:00 PM	PIO (Email from	Boes	Steven	Father.Boes@boystown.org	Boys Town	<p>As you stand up the Main Street Program, Boys Town respectfully requests you do the following to support non-profit organizations on the front lines:</p> <ul style="list-style-type: none"> <li>&amp;#183; Set a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>&amp;#183; Prioritize 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>&amp;#183; Delay payments for two years after a direct loan is made</li> <li>&amp;#183; Begin employee retention provisions on the date that loan funding is received by the borrower</li> <li>&amp;#183; Define "workforce" as full-time employees or full-time equivalents when implementing workforce restoration and retention provisions</li> </ul> <p>Boys Town serves the most vulnerable children and families in the country. Alongside many other large non-profit organizations, we have targeted our work to respond to the COVID-19 crisis. Yet, we face our own challenges as the COVID-19 outbreak drastically impacts our bottom lines, and unfortunately, many non-profits that employ more than 500 people have been unable to access the Paycheck Protection Program.</p> <p>While we are all facing an unexpected challenge right now, what we can predict is an increased demand for services when this crisis is over and the healing begins. Ensuring our organizations can remain solvent is critical to both continued service delivery and retaining a large sector of our economy. The main Street Program can provide a lifeline to many critical non-profit organizations.</p>
4/16/2020 6:10:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>Meaning of "Bank Debt" in the 30% Size Limiting Test for ELP</p> <p>Problem - It is unclear what "bank debt" is meant to pick up. If this term is to pick up all debt of any kind with banks, cash management arrangements could limit borrowing. If this term was to pick up only debt of banks, then companies that only have debt with a non-bank lender would not be able to take advantage of a MSLF.</p> <p>Solution - Clarify that this term is meant to include "all loans, notes and loan commitments" with "any lender".</p> <p>Meaning of "Committed but Undrawn Debt" in the Leverage Size Limiting Test</p> <p>Problem - The language "committed but undrawn debt" is problematic. It is not typical for undrawn debt to be picked up in a leverage test. It also sends the signal that the company is required to draw on every last dollar available. If this program is to provide companies needed liquidity, this would cause the company to put itself in a very vulnerable situation. The term sheets provide that no existing debt may be reduced or terminated, so even if a company looks to reduce its undrawn commitment to satisfy the leverage test, it cannot do so. Second, it is unclear what "debt" is meant to pick up.</p> <p>Solution - First, have such leverage test for availability only pick up amounts outstanding and not amounts that are committed but undrawn. Second, clarify that such leverage test only includes loans and notes.</p>
4/16/2020 6:10:00 PM	PIO (Email from	Tuitt	Maria	maria.tuitt@heartshare.org	Heartshare	<p>As a non-profit organization, we serve over 500 people; which are some of society's most vulnerable individuals and adults with intellectual and developmental disabilities. We are asking that we be included in the Main Street Lending Program. We need your support!</p>
4/16/2020 6:13:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>Maturity for Expanded Loan Facility</p> <p>Problem - Most existing credit agreements prevent new loans to mature inside the maturity of existing loans as existing lenders do not want new loans get paid off before the existing loans.</p> <p>Solution - Allow for the maturity date of an ELF to be the later of (i) four years and (ii) the latest maturity date of any of the existing loans under the existing loan facility.</p> <p>Eligible Lenders</p> <p>Problem - Limits the lenders eligible to participate in MSLF to only US banks and US SLHCs. With many non-bank lenders and foreign lenders in the lending market and that are existing lenders under the ELF, this is going to exclude many lenders and overwhelm the US banks that are eligible.</p> <p>Solution - Include direct/non-bank lenders and foreign lenders (and clarify that US branches of foreign banks) as eligible lenders.</p>

Main Street Lending Program Comments

4/16/2020 6:13:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>Distribution/Equity Repurchase Issues</p> <p>Problem - Unclear whether the distribution restriction would block distributions from acquisition or IPO activity for up to 12 months after repayment of the loan.</p> <p>Solution - Provide clarity that distributions to equity holders from an acquisition or IPO will be permitted, subject to full repayment of the MSLF loan prior to distributions.</p> <p>Problem - The restriction on distributions prohibits public companies to repurchase the equity of officers, directors and estates upon termination of employment, death, etc., especially with respect to officers and directors that enter into agreements with a company after the closing of the loan facility.</p> <p>Solution - Provide a carve-out from the distribution restriction for such equity buybacks.</p> <p>Problem - The restriction on distributions does not provide for (i) tax distributions or (ii) distributions for fees or expenses that need to be paid by holding companies.</p> <p>Solution - Allow for (i) tax distributions and (ii) distributions covering fees and expenses that are to be paid by a holding company.</p>
4/16/2020 6:14:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>Issues with Restriction on Ability to Repay &amp;quot;Other Debt of Equal or Lower Priority&amp;quot;</p> <p>Problem - The restrictions on debt of equal or lower priority creates ambiguity that apparently does not allow for revolving loan repayments. Also, unclear whether existing mandatory prepayments are permitted.</p> <p>Solution - Clarify that (i) revolving loans may be repaid at any time and (ii) mandatory prepayments (in addition to scheduled amortization payments) are permitted.</p> <p>Problem - Causes issues for any seller notes and other debt in effect prior to the closing of the MSLF that have repayments due during the term of the MSLF.</p> <p>Solution - Allow for repayments, including prepayments, required under any agreements that were in effect prior to the closing of the MSLF.</p> <p>Problem - Does not clarify what is meant by &amp;quot;debt&amp;quot; and whether such term includes items such as earnouts and holdbacks.</p> <p>Solution - Clarify that the term &amp;quot;debt&amp;quot; in such restriction means only loans and notes.</p>
4/16/2020 6:15:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>Interest Rate Issues</p> <p>Problem - NLF and ELF only provides a SOFR interest rate option. Many lenders are still developing SOFR procedures and language to implement in their loan documents. Also, there is no base rate option, even in a situation where SOFR is unavailable for any reason.</p> <p>Solution - Allow also for a base rate option to address these issues. In an ELF, permit the reference rate, including alternate rate provisions related to the end of LIBOR, to be the same as the existing loan.</p> <p>Foreign Ownership</p> <p>Problem - Does not provide whether foreign ownership of US companies is permitted or whether non-US subsidiaries may be co-borrowers or guarantors (e.g., where they are part of a credit group in an existing loan facility).</p> <p>Solution - Clarify that foreign ownership of US companies is allowed and non-US co-borrowers and guarantors are allowed in an ELF to the extent that they are obligors under the existing loan.</p>
4/16/2020 6:15:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>Practical Access to ELF</p> <p>Problem - Existing lenders not providing loans under an ELF may have no incentive to consent, especially where there is no debt flexibility under the existing credit agreement and considering the new loans would be secured by the same collateral on a pari passu basis.</p> <p>Solution - Have the SPV pay a fee to any existing lenders whose consent is needed that consent to the ELF.</p> <p>Problem - Many of the terms for an ELF will make it hard to utilize the program due to difficulties with including a new tranche in the existing loan facility or providing the ability to have a new tranche in separate loan documentation. The issues include: (i) requirement to secure an ELF by the same collateral, which can present intercreditor issues, (ii) potentially using a different interest rate in SOFR before LIBOR is phased out or (iii) amortization potentially being different than the existing loans.</p> <p>Solution - One option would be to allow for a holdco structure where the debt is above the entity level where the existing loans sit (and clarify that the borrower does not need to be an operating company).</p>

Main Street Lending Program Comments

4/16/2020 6:18:00 PM	PIO (Email from	Bohn	Tom	kcraven@acg.org	Association for Corporate Growth	<p>The Association for Corporate Growth (ACG) represents 15,000 professionals who operate within the middle market, comprised of 200,000 companies that employ 45 million Americans. ACG received the news of the Main Street Lending Program with optimism because it appeared to be more broadly available to private equity-sponsored businesses than the PPP. America cannot afford the continued exclusion of middle-market companies from federal relief programs.</p> <p>We appreciate the opportunity to comment on the Main Street Lending Program. ACG urges the Federal Reserve to be liberal in its administration of the Main Street Lending Program and recommends solutions (individually submitted) to ten areas.</p> <p>COVID-19 forces companies to face a profound confluence of concerns daily, at the forefront is the livelihood of their employees. The Federal Reserve is the fabric that keeps this U.S. economy together - wedding consumer and business interests to make it stable and vibrant. We urge the Federal Reserve to be liberal in allowing access to the relief loans intended to keep people employed and businesses operating and to respect the judgment of business leaders who are willing to assume debt as a means to survive this crisis. Consumer confidence will never rebound if Americans are not gainfully employed.</p> <p>Respectfully, Thomas Bohn President and CEO Association for Corporate Growth</p>
4/16/2020 6:19:00 PM	PIO (Email from	Diekmann	Douglas	ddiekmann@fbei.net	First Federal Savings Bank	<p>Please consider how to establish this program in such a way that individuals not needing the aid will be excluded from participation. As an example, the PPP Program has been wildly successful partly because some recipients have used it to support their payroll for staff that was never in jeopardy of being reduced. As a result, a significant amount of the allocation has been made available and used by individuals and corporations that did not need it. If this program is going to be successful, it must be targeted where there is true need (company's that have shut down or been materially impacted) and those that are getting preferential terms or are abusing the system must be excluded in order to accomplish the most good.</p>
4/16/2020 6:22:00 PM	PIO (Email from	Gehres	Edward	Edg@vnf.com	Van Ness Feldman	<ol style="list-style-type: none"> <li>1. Please reaffirm that earnings before interest depreciation and amortization (EBITDA) will for financial services company will include interest income, lease income and financing fees and exclude interest expense on credit facilities.</li> <li>2. Please reaffirm that independent companies that are subsidiary holdings of a larger holding company may apply for the Main Street program individually despite being part of a larger company.</li> <li>3. Many middle market companies that are part of a larger holding company pay, in the normal course of business, certain fees for "shared services" from the holding company. Please explicitly allow Main Street borrowers to use loan proceeds to pay such regularly scheduled fees and other mandatory debt obligations that will sustain the company's operations. These expenses are as important as payroll and operational expense, and indeed oftentimes these fees and costs defray administrative costs for payroll, shared benefits systems, and certain operating expense categories, like intracompany IT and tech services.</li> <li>4. Please reaffirm that the debt to EBITDA multiples quoted in the term sheets only take into account the debt of the program.</li> <li>5. Please confirm that amended equipment loans and leases will qualify as eligible collateral under the TALF program and that the program will be expanded to include non-conforming mortgages, commission receivables, and other consumer loans?</li> </ol>
4/16/2020 6:23:00 PM	PIO (Email from	Unzicker	Patrick	pat.unzicker@rrts.com	Ascent Global Logistics	<p>Ascent Global Logistics is a Roadrunner Transportation Systems portfolio company. Ascent plays a vital role in our national supply chain. Our trucks keep America's grocery stores stocked and our planes carry ventilators. Our teams work to keep factories operating by ensuring critical supplies are there when needed.</p> <p>Ascent is seeking clarification that we can apply for a Main Street loan. The term sheet appears to provide flexibility for either a portfolio company or corporate parent to apply. Roadrunner portfolio companies have separate management teams and financial statements. Roadrunner is investing in "Main Street" businesses consistent with the intent of the loan program. While Ascent is a successful business with a history of positive EBITDA before COVID-19, Roadrunner's Less than Truckload (LTL) business has not had positive cash flow. If Roadrunner were required to apply for the loan, LTL's EBITDA would negatively affect Ascent's ability to receive a loan.</p> <p>We urge the Fed to provide flexibility to banks in determining the period for EBITDA. The term sheets require banks to use 2019 EBITDA for the size of a loan, however, there are circumstances where 2019 EBITDA is not representative. Our 2019 EBITDA was negatively affected by the GM strike and the impact from the 2019 global trade war. Banks should be able to exercise discretion and consider 2018 EBITDA for calculating the loan size and protecting against default.</p>



Main Street Lending Program Comments

4/16/2020 6:23:00 PM	PIO (Email from	McKeon	Debbie	rhiannon@sdgrantmakers.org	San Diego Grantmakers	<p>Non-profits are adapting during the crisis to meet increased needs while struggling with reduced donations, additional expenses, and the need to modify government contracts due to changing and unprecedented needs. In addition, non-profits across the country employ 12.3 million people and have a far-reaching, significant impact on the economy. Like small- and mid-sized businesses, non-profits can benefit from loans through the proposed Main Street lending facility, particularly those not eligible for the Paycheck Protection Loans.</p> <p>However, the program, that would offer 4-year loans to companies employing up to 10,000 workers or with revenues of less than \$2.5 billion to small- and mid-sized businesses in good financial standing before the crisis with deferred principal and interest for one year, is not open to non-profits.</p> <p>According to recent research from CalNonprofits, 60% of non-profits in California provide essential services. These non-profits, and those like them across the country, are key to getting through this crisis and revitalizing the economy and should be included in this new lending program. Philanthropy, like other sectors, is moving to provide enhanced support and funding to non-profits, but philanthropy alone cannot fill the gap. San Diego Grantmakers believes the inclusion of non-profits in the eligibility criteria is key to ensuring our non-profits can continue to serve our most vulnerable communities throughout this crisis and beyond.</p>
4/16/2020 6:31:00 PM	PIO (Email from	cabrales	Ana	Personal Email Address		<p>Main street needs broad access to reasonably priced credit especially if they have some form of collateral this will be catastrophic if not. This article in the WSJ frames well <a href="https://www.wsj.com/articles/main-street-needs-more-fed-help-11587055459?mod=mhp">https://www.wsj.com/articles/main-street-needs-more-fed-help-11587055459?mod=mhp</a></p>
4/16/2020 6:33:00 PM	PIO (Email from	Fanning	John	john@netcapital.com	Netcapital	<p>Direct Lending would be better. Banks are difficult to deal with on loans that are not 100% guaranteed. Most importantly the term of the loans should be longer. 10- 30 year terms so that the debt does not have to be refinanced at a time when it might not be possible.</p>
4/16/2020 6:34:00 PM	PIO (Email from	Ortiz	Nicholas	nortiz@bakochamber.com	Greater Bakersfield Chamber	<p>I am writing regarding the Main Street Lending program, and the current ineligibility of certain nonprofit organizations.</p> <p>The CARES Act excluded certain nonprofits from accessing the vital Paycheck Protection Program (PPP). In a letter last week to the congressional leadership, 80 local Chambers of Commerce in California wrote the following: "Our organizations have determined that if we are not allowed to access the PPP or some similar type of relief, our only recourse will be staff layoffs; resulting in the immediate loss of approximately 123 jobs, representing \$4.8 million in payroll. Should economic conditions not improve, or stay at home orders continue past June 30th, those numbers will increase significantly."</p> <p>Now that the PPP is exhausted, it is more important than ever to include all nonprofits in the Main Street Lending Program. This unprecedented public health challenge has upended life for nearly every citizen and business in America. Businesses and organizations of all types and sizes require assistance and support.</p> <p>Chambers of commerce are especially vital in light of the increasing needs of small businesses during this pandemic. Local chambers serve as vital communication channels for small business assistance and community needs. Federal, state and local governments need us as partners now more than ever.</p> <p>We urge you to include all nonprofits in the Main Street Lending Program.</p>
4/16/2020 6:35:00 PM	PIO (Email from	McCarthy	Louise	jpreece@ccalac.org	Community Clinic Association of Los Angeles County	<p>Dear Secretary Mnuchin:</p> <p>The Community Clinic Association of Los Angeles County (CCALAC) is concerned that the new Main Street Lending Program is heavily weighted in favor of businesses and will leave out non-profits that desperately need assistance. CCALAC represents 63 non-profit community clinic and health center organizations in Los Angeles County. Our members are business that are drivers of their local economies; not only are they on the front line caring for patients during this crisis, but they also employ a wide range of staff from medical providers and support staff, to call center operators, security and janitorial personnel. Many non-profit organizations are too big to qualify for SBA Paycheck Protection Loans; they are having difficulties with cash flow during this crisis and are struggling to keep their doors open and their staff employed. The CARES Act includes a specific provision that asks Treasury to start a loan program for businesses and non-profits with 500 - 10,000 employees. Congressional intent is clear that non-profits should have access to low-interest loans at this difficult time. I implore you to explicitly include non-profit organizations in the Main Street Lending Program and ensure that guidance to lenders encourages them to make loans to non-profits in addition to for-profit businesses.</p> <p>Thank you,          Louise McCarthy          President and CEO          Community Clinic Association of Los Angeles County</p>

Main Street Lending Program Comments

4/16/2020 6:38:00 PM	PIO (Email from	DeWitt	Mike	mike.dewitt@brightworth.com	The Center for Children and Young Adults	I serve as the President of the Board for The Center for Children & Young Adults (CCYA), a 501c(3) non-profit that provides a home for youth who have been abused, neglected, and/or abandoned by their caregivers. Our three-building campus offers four residential programs in a dormitory setting for up to 42 youth at one time in need of shelter, treatment, care and guidance. I IMPLORE you to not exclude non-profits from the Main Street Lending Program. CCYA and others like it provide critical care services 24/7 - much like a healthcare facility, we do not &#39;shut down&#39;. Half of our funding comes from the state of Georgia - that funding is directly tied to the number of children in the Center. Those numbers have dropped for various reasons related to COVID-19. But our costs continue. Our private donations have also dropped dramatically. We did not receive funding in the PPP program. Please do not exclude non-profits in the Main Street program.
4/16/2020 6:40:00 PM	PIO (Email from	Kulkin	Matthew	mkulkin@steptoe.com	Steptoe & Johnson LLP	On behalf of interested clients of Steptoe & Johnson LLP, we submit the following two comments: Please confirm that American companies with negative EBITDA can participate in the Main Street Lending Program despite the maximum loan size factors. This would allow retailers, start-ups, and companies who are early in their corporate development to participate in the program. Similarly, restricting loan sizes pursuant to the other applicable factors would assist companies with misleading or low EBITDAs to participate in the program. Access to Main Street loans based on the other borrower criteria would allow a large number of growing employers to access capital, maintain workforce levels, and continue their pre-crisis growth.  Please clarify that certain tax distributions may still be made despite on dividends. The term sheets refer to the 4003(c)(3)(A)(ii) prohibition on dividends. The statutory language related to mid-sized businesses, however, includes a similar prohibition in 4003(c)(3)(D)(i)(VII), with the following exception: &quot;except to the extent required in a contractual obligation that is in effect as of the date of enactment of this Act.&quot; The Main Street Lending Facility, focused on small and mid-sized businesses, should adopt this language. In addition, many closely-held businesses make tax distributions without a contractual agreement. These distributions should be respected given that many business owners rely on such distributions for the liquidity to pay taxes.
4/16/2020 6:41:00 PM	PIO (Email from	Peterson	Eric	eric@pelicaninstitute.org	Pelican Institute	Despite the complications with Small Business Administration (SBA) loans, the fact that almost all the funding has been distributed suggests that businesses are able to access this liquidity. However, when talking to many of the businesses throughout the state who are too large to apply for the small business loans, there is often confusion surrounding how to access the funds. There are both practical concerns of how to apply for the funding in the first place, if they qualify for the loans, and if they will be able to meet the requirements set out by the CARES Act. While the Fed has been granted a lot of leeway by Congress to administer this program, and rightfully so, more clarity is needed for businesses. We ask that the Fed both work to finalize all rules as soon as possible and work to provide more information on how to access these funds. Mid-sized businesses have an important role to play in both the American and Louisiana economies. If they cannot figure out how to access the funds to survive an economic crisis that was not of their making, we hold grave concerns about the future of our state&#39;s economy.
4/16/2020 6:43:00 PM	PIO (Email from	Peterson	Eric	eric@pelicaninstitute.org	Pelican Institute for Public Policy	In order to be eligible for loans, medium- and large-sized businesses must meet a host of both present and future requirements, as laid out by the CARES act. It should be noted that these loans are not forgivable like many small business loans are. These loans will be paid back with interest, though at a fairly low rate. Some of these requirements include not being able to use the funds for stock buybacks or increasing compensation for already high-earning employees. Both of these outcomes were unlikely, as high earners in large companies often forgo their paychecks entirely or take large reductions. Additionally, companies tend to buy back stock when they feel strong about their future and want to invest more in the firm. Given the circumstances, they will almost certainly hold onto higher cash reserves. Other requirements, specifically labor decisions for their employees, are more concerning. As with the last economic crisis, companies did not cause this current situation. Companies trying to keep their doors open and continuing to pay their employees are taking these loans with little choice in the matter. Severely restricting the ability of companies to make the best labor decisions moving forward on a condition of taking the loan will not help the American economy get back on track. In fact, it will hinder it. The Federal Reserve should do everything in its power to provide maximum labor flexibility to loan recipients.
4/16/2020 6:46:00 PM	PIO (Email from	Epting	Terri	tepting@cfbh.com.org		As the CFO of a non-profit that serves as a funder to other non-profits, it&#39;s imperative that our non-profit sector is included in any type of funding made available by the government. If it were not for the many social services provided by our sector, many of our citizens would not have their essential needs met. Our resources are generated from the generous donors in our community. During this epidemic, some of them are not able to give at the same level due to the stock market. Most non-profits do not have a large reserve to weather the type of storm we are facing today. As a voting and contributing citizen, my husband and I want to see non-profits continue to thrive in our community to help meet the needs of the less fortunate. Our family is trying to do its part, we want to see our government leaders step up and do their part by supporting non-profits in every funding opportunity made available to small businesses. Thank you.

Main Street Lending Program Comments

4/16/2020 6:46:00 PM	PIO (Email from	Hobbs	Dawson	ali@wswa.org	Wine & Spirits Wholesalers of America	<p>The wine and spirits wholesale industry could be impacted by the "committed but undrawn debt" restriction because use of that credit method is widely used to finance inventory, and we would therefore ask that you consider removing that condition in its entirety from the term sheets.</p> <p>Otherwise we urge the Federal Reserve to consider modifying the Loan Facility Term sheets to allow borrowers to calculate their loan amounts using only the amount of "committed but undrawn debt" that is available to them without punitive bank responses.</p> <p>We propose the following modification for your consideration:                  Substitute "available" for "committed" in item 5.                  Add the following clarifying language: "For purposes of determining the eligible loan amount (or, for purposes of this provision), an eligible borrower's existing outstanding and available but undrawn bank debt does not include any amount that, if drawn, would cause the Borrower to suffer fees, penalties, restrictions, or limitations on its operations. Lease financing obligations are also excluded."</p>
4/16/2020 6:49:00 PM	PIO (Email from	Hernandez	Fernando	Personal Email Address	Elite Realty Sales	<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion. I serve on the board of directors of Momentum for Mental Health, which provides mental and other health care to over 2,000 clients per year in the Santa Clara County area, with a staff of 400 employees. We need the funding for this non-profit now more than ever.</p>
4/16/2020 6:50:00 PM	PIO (Email from	Rudquist	Melanie	melanie@village-life.net	Village Life Inc.	<p>Please provide clarity on the two different loans, and if we can borrow on both.</p> <p>Also seeking clarity on the MSNLF calculation of the maximum loan size as part 5(ii) is unclear.</p> <p>Seeking clarification as to EBITDA/Leverage test: For the Main Street it asks about "undrawn debt" for the Expanded it asks about "undrawn bank debt". As an example, we have project specific real estate loans that are not fully drawn. Do we need include these amounts in our calculation?</p> <p>When we calculated EBITDA, does the interest adjustment include capitalized interest amounts? Interest in WIP vs interest in COGS?</p> <p>Is there a possibility to remove or change the restrictions on capital distributions - especially makes sense for the shareholders who use capital distributions in lieu or in addition to their salaries?</p>
4/16/2020 6:52:00 PM	PIO (Email from	McAleer	Rebecca	rebecca@gntv.info	GNTV Media Ministry	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 7:01:00 PM	PIO (Email from Steele)	Steele	Sharon	ssteele@dekalbhabitat.org	Habitat for Humanity DeKalb	<p>To whom it may concern:</p> <p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits. The nation's nonprofits typically serve those who are more deeply impacted by such unprecedented times such as these and we must be able to continue those services to ensure everyone is able to recover.</p> <p>Best, Sharon Steele</p>
4/16/2020 7:04:00 PM	PIO (Email from Gunnin)	Gunnin	Matthew	mgunnin@esports.one	Esports One, Inc	I am interested in learning more about the Main Street Lending for Small Businesses.
4/16/2020 7:04:00 PM	PIO (Email from Sternberg)	Sternberg	Mollie	msternberg@hscfs.org	Hathaway-Sycamores Child and Family Services	<p>Related to COVID 19</p> <p>I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California.</p> <p>I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following:</p> <ul style="list-style-type: none"> <li>oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization</li> <li>oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts</li> <li>oPayments should not be due until two years after a direct loan is made</li> <li>oEmployee retention provisions should begin on the date that loan funding is received by the borrower</li> <li>oIn any workforce restoration and retention provisions, "workforce" should be defined as full-time employees or full-time equivalents</li> </ul>
4/16/2020 7:05:00 PM	PIO (Email from Verdery)	Verdery	C. Stewart	stewart@monumentadvocacy.com	Monument Advocacy	<p>On behalf of BCD Travel, Travel Leaders Group, and Travel and Transport, some of the nation's largest travel management companies (TMCs), please consider the following:</p> <p>To recover from COVID-19, TMCs will need capital to maintain their infrastructure and bring back employees. TMCs work with companies across the U.S. to manage travel programs, optimize budgets and help fulfill duty of care obligations that keep business travelers safe. TMCs will be at the forefront of nationwide recovery efforts because their services, including arranging safe travel itineraries and tracking travel restrictions, will be needed to get the global economy safely moving again.</p> <p>Travel bookings for TMCs have almost ceased entirely, and there will be a slow return once social distancing restrictions begin to ease. To address these challenges, we urge the Federal Reserve to adopt the following policies:</p> <ul style="list-style-type: none"> <li>- Extend loan repayment terms to 10 years to accommodate the travel sector's slow recovery. - - Consider raising maximum loan amount for new loans to \$100 million to provide greater flexibilities to respond to needs of distressed industries.?</li> <li>- Be lenient on provisions requiring that a business must use reasonable effort to maintain payroll and employees; many TMCs will have little business for the foreseeable future.</li> <li>- Place a cap on loan origination fees and fees charged by lenders for amending existing facilities that may be required as a result of participation in the program.</li> </ul>

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4/16/2020 7:07:00 PM	PIO (Email from	Gupta	Nik	nikg@mccn.org	Mission City Community Network	Mission City Community Network(MCCN), a Not-For-Profit 501 C(3) community clinic is deeply concerned to learn that nonprofits are ineligible for the Federal Reserve's new "Main Street" lending facility, despite the fact that nonprofits are leading the effort to respond to this pandemic. MCCN has been providing tele visits as well as video visits with very little funding to our low income community patients. Nonprofits like ours need access to these government backed revenue streams and loan programs. The exclusion of non-profits is a particularly devastating blow for larger nonprofits who are ineligible for the Paycheck Protection Program lending option. Given the current financial crisis and loss of revenue, nonprofits, including critical health care entities, may be forced to shrink their services or even close, meaning tens of thousands could go without care. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.
4/16/2020 7:09:00 PM	PIO (Email from	Kashani	Daryoush	dkashani@cffhae.org	Center for Family Health & Education	Center for Family Health & Education is deeply concerned to learn that nonprofits are ineligible for the Federal Reserve's new "Main Street" lending facility, despite the fact that nonprofits are leading the effort to respond to this pandemic. Despite a 60% decrease in patient visits due to "Stay at Home" orders, our non-profit clinics have kept staff on the job, doing triage and Coronavirus testing in tents to protect staff inside the facilities. We have switched chronically ill patients to telehealth visits and are keeping faith with the community in our commitment to service. Nonprofits like ours need access to these government backed revenue streams and loan programs. The exclusion of non-profits is a particularly devastating blow for larger nonprofits who are ineligible for the Paycheck Protection Program lending option. Given the current financial crisis and loss of revenue, non-profits, including critical health care entities, may be forced to shrink their services or even close, meaning tens of thousands could go without care. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.
4/16/2020 7:10:00 PM	PIO (Email from	Rosenwald	Laura	lonnie@300degreeslaw.com	300degrees, PLLC	As outside counsel to the YMCA of Greater Seattle, I am writing to urge that nonprofits, especially those with more than 500 employees are deemed eligible for the Main Street Loan Program. Nonprofits have depleted their cash reserves addressing COVID-related community needs including for childcare for healthcare workers, shelters and nutrition programs, and need financial support to sustain operations during the COVID crisis. Nonprofit organizations should be granted loan forgiveness in the Main Street Lending program. Nonprofits are doing much of the relief work that the government would otherwise be responsible for.
4/16/2020 7:14:00 PM	PIO (Email from	bolger	brenna	brenna_bolger@prxdigital.com	prxdigital	Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.
4/16/2020 7:15:00 PM	PIO (Email from	Gallo	Briana	briana@prxdigital.com		Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.

Main Street Lending Program Comments

4/16/2020 7:17:00 PM	PIO (Email from	Pesner	Rabbi Jonah Dov	jjacoby@rac.org	Union for Reform Judaism, Religious Action Center of Reform Judaism	<p>On behalf of the Union for Reform Judaism, whose nearly 850 congregations across North America encompass 1.5 million Reform Jews, and the Central Conference of American Rabbis, whose membership includes more than 2,000 Reform rabbis, we urge the Federal Reserve to ensure nonprofits are eligible for support lending under the Main Street Lending Program during the COVID-19 emergency and economic recession.</p> <p>As Americans struggle with the impact of shuttered businesses, closed schools, and more, nonprofits are being called on more than ever to provide critical aid while their own financial resources are greatly diminished. In this time of need, we urge the Federal Reserve to make necessary improvements to the Main Street New Loan Facility and the Main Street Expanded Loan Facility and ensure that nonprofits are able to sustain their critical work.</p> <p>We are inspired by Jewish tradition and values that teach the importance of strong communal institutions that help individuals become self-sufficient. The Jewish philosopher Moses Maimonides taught that the highest form of tzedakah, charity, was that which helped people to become self-sufficient. America's nonprofits help community members become more self-sufficient every day. Now, in their own time of need, the Federal Reserve must help nonprofits continue their essential work.</p> <p>Guided by our teachings, we strongly urge the Federal Reserve to support including eligibility for nonprofits in the Main Street Lending Program.</p>
4/16/2020 7:17:00 PM	PIO (Email from	Kovach	Bill	bill.kovach@cemco.org	Coastal Empire Montessori Charter School	<p>I write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>I urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 7:18:00 PM	PIO (Email from	Foley	Henry (Hank)	President@nyit.edu	New York Institute of Technology	<p>On behalf of New York Institute of Technology, I ask that the Federal Reserve clarify if private, nonprofit universities are eligible for the Main Street Lending program, and whether student workers are exempted for the purpose of the employee count. These universities are major employers with significant impact in their communities (ours is \$634 M and over 5000 jobs). We are facing a major cash flow crisis due to reduced revenue and increased spending resulting from the COVID-19 pandemic (room and board refunds, investments in technologies for remote instruction, deep-cleaning of campus buildings, increased security, and revenue losses due to cancellation of in-person events and summer programs). Low-cost loan programs (Main Street Lending) would help New York Tech address the financial impact of the COVID-19 crisis. However, two main issues may prevent our access to this and other programs: 1) we request that the Federal Reserve update the guidance to clarify whether public and private nonprofit colleges and universities are eligible for the Main Street program; 2) we ask that student workers be exempted for the purpose of the employee threshold for eligibility (business under 10,000 employees). Looking forward to working with you as the Federal Reserve responds to the COVID-19 crisis. Dr. Foley</p>
4/16/2020 7:19:00 PM	PIO (Email from	MacDonald	Stephen	Personal Email Address		<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business.</p> <p>Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>

Main Street Lending Program Comments

4/16/2020 12:00:00 AM	PIO (Email from	Sidney	Mary	msidney@cs uchico.edu	Chico State Enterprises	CSU campuses have moved classes to online instruction; revenue streams have decreased significantly and refunds have been made to students in a number of areas, including student housing, parking, and student dining. In order to meet these challenges and keep personnel employed, public universities and non-profit entities will require access to low-cost capital. The CSU notes: There has been confusion about the eligibility of public universities and non-profits for this program. We ask for updated the guidance to clarify that non-profit entities and public institutions of higher education with direct borrowing authority are eligible for the Main Street Lending program; and clarity is needed with respect to the definition of employment of student workers. Specifically, the CSU asks that student workers be exempted for the purposes of the employee threshold for eligibility (businesses with under 10,000 employees). We hope that future guidance from the Federal Reserve will make it clear that institutions can exempt student workers from the employee count. Many of our campuses employ student workers as a part of overall student financial support to help pay for college and to provide students with work experiences while keeping them close to campus. With our campuses closed, all or most of these student employees are no longer present, and therefore should not be included for the purposes of the employee threshold. Thank you. Mary Sidney, CEO
4/16/2020 7:23:00 PM	PIO (Email from	Chang	Richard	Leong@cars onchamber.c om	CARSON Chamber of Commerce, California	It is important that funds for 501(c) 6 non-profit organizations be included in the extension to the initial CARES funding because they serve the nation in an important way by representing workers and businesses in a way that no other organization does. Their role in furtherance of the community is also an important part of what they do.
4/16/2020 7:28:00 PM	PIO (Email from	Escamilla	Adrianna	aescamilla@ hscfs.org	Hathaway Sycamores Child and Family Services	I am affiliated with a non-profit organization that provides behavioral health, child welfare services, housing support to individuals in California. I ask the Federal Reserve and Treasury Department to immediately issue guidance on a program, as directed under the CARES Act, to provide financing to banks and other lenders to make loans to non-profits and other mid-size businesses (between 500-10,000 employees). We request that the program include the following: oInclude a 0.50% interest rate (50 basis points) for 501(c)(3) charitable nonprofits at a 5-year amortization oProvide priority to 501(c)(3) charitable nonprofits responding to COVID-19 relief efforts oPayments should not be due until two years after a direct loan is made oEmployee retention provisions should begin on the date that loan funding is received by the borrower oIn any workforce restoration and retention provisions, &quot;workforce&quot; should be defined as full-time employees or full-time equivalents Many non-profit organizations are not able to access the Paycheck Protection Program , which is critical to ensure the continued provision of essential services during this crisis Without increased access to loan programs intended to sustain payroll and retain employees, these mid-sized non-profit organizations are at financial risk, a circumstance that could leave thousands of individuals without timely access to needed care.
4/16/2020 7:33:00 PM	PIO (Email from	Navolnev	Sergey	snavolnev@e isnerhealth.or g	Eisner Health	Pediatric & Family Medical Center, dba Eisner Health is deeply concerned to learn that nonprofits are ineligible for the Federal Reserve's new &quot;Main Street&quot; lending facility, despite the fact that nonprofits are leading the effort to respond to this pandemic. While hospitals provide emergency care to treat COVID-19, our health center addresses all of our community's other healthcare needs that cannot be ignored. Today, we operate in 16 locations throughout Los Angeles County and serve over 50,000 patients, which generates over 200,000 annual visits-ranging from primary care to dental services, among many others. Nonprofits like ours require access to these government-backed revenue streams and loan programs. The exclusion of non-profits is a particularly devastating blow for larger nonprofits who are ineligible for the Paycheck Protection Program lending option. Given the current financial crisis and loss of revenue, nonprofits, including critical health care entities, may be forced to shrink their services or even close, meaning tens of thousands could go without care, and hundreds of staff members will be unemployed. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.  Thank you very much for your consideration. Sergey Navolnev on behalf of Eisner Health.

Main Street Lending Program Comments

4/16/2020 7:37:00 PM	PIO (Email from	Sifer	Kathleen	kathleen.sifer@us.gt.com	Grant Thornton	<p>Given the following restrictions under Sec. 4003(c)(3)(A)(ii)(II) and Sec. 4003(c)(3)(D)(i)(VII) of the CARES Act, which restriction applies to the Main Street Lending Program?</p> <p>Sec. 4003(c)(3)(A)(ii)- The Secretary may make a loan, loan guarantee, or other investment under subsection (b)(4) as part of a program or facility that provides direct loans only if the applicable eligible businesses agree-</p> <p>(II) until the date 12 months after the date on which the direct loan is no longer outstanding, not to pay dividends or make other capital distributions with respect to the common stock of the eligible business; and</p> <p>Sec. 4003(c)(3)(D)(i)(VII)- the recipient will not pay dividends with respect to the common stock of the eligible business, or repurchase an equity security that is listed on a national securities exchange of the recipient or any parent company of the recipient while the direct loan is outstanding, except to the extent required under a contractual obligation that is in effect as of the date of enactment of this Act;</p>
4/16/2020 7:38:00 PM	PIO (Email from	Deboer	Dylan	Personal Email Address	Good News TV	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>
4/16/2020 7:39:00 PM	PIO (Email from	Singh	Jivtesh	Info@abdentalny.com	A&B Dental PC	<p>Hello, where and how soon can I apply for the Main Street lending program? Thank You.</p>
4/16/2020 7:40:00 PM	PIO (Email from	Beattie	Martha	mcbeattie@jps.net		<p>Thank you for the opportunity to provide comments on the Main Street New Loan Facility, authorized by the Federal Reserve Act. I am affiliated with a nonprofit behavioral health organization serving children and families in California and I am writing to advocate for restoration of the applicability of the Main Street Lending Program to nonprofits with more than 500 employees. Without increased access to lending programs intended to sustain payroll and retain employees, many mental health and substance use service providers are at risk, a circumstance that could leave hundreds of thousands without access to appropriate and desperately needed treatment and care. A lack of access to adequate mental and substance use care will lead many Americans to utilization of emergency services, over-crowding community hospital emergency departments and drastically increasing health care costs. As such, it is imperative that the Main Street New Loan Facility eligibility include nonprofit organizations employing up to 10,000 employees or with 2019 annual revenue up to \$2.5 billion.</p>
4/16/2020 7:41:00 PM	PIO (Email from	Boykins	Rakeem	Rakeem.Boykins@Heartshare.org	Heartshare	<p>Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!</p>
4/16/2020 7:42:00 PM	PIO (Email from	Paris	Paris	Paris@as220.org	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>



Main Street Lending Program Comments

4/16/2020 7:43:00 PM	PIO (Email from Sifer	Sifer	Kathleen	kathleen.sifer@us.gt.com	Grant Thornton	<p>General</p> <p>Question: Could the Federal Reserve please provide clarification on the relationship between the CARES Act and the Federal Reserve term sheets, including, but not limited to, the Main Street Lending Program's MSNLF and MSELF?</p> <p>Question: How do the restrictions referenced under 4003(c)(3)(D)(i) apply to the Federal Reserve's term sheets, including, but not limited to, the Main Street Lending Program's MSNLF and MSELF?</p> <p>Question: With respect to the restrictions under Sec. 4003(c)(3)(A)(ii)(II) and Sec. 4003(c)(3)(D)(i)(VII) of the CARES Act, which restrictions apply to the Main Street Lending Program?</p>
4/16/2020 7:44:00 PM	PIO (Email from Anchundia	Anchundia	Elizabeth	elizabeth.alvarez-anchundia@heartshare.org		<p>Support for the Main Street lending program to include non-profit organizations over 500 people is vital to our continued existence during this crisis. We serve some of society's most vulnerable individuals -- children and adults with intellectual and developmental disabilities! We need your support!</p>
4/16/2020 7:46:00 PM	PIO (Email from Sifer	Sifer	Kathleen	kathleen.sifer@us.gt.com	Grant Thornton	<p>Debt &amp; Prepayment</p> <p>The following questions are in regard to the MSNLF and MSELF Eligible Loans Section 5.</p> <p>oQuestion: As such, can it be understood to mean that firms must max out their potential debt draws before they are eligible?</p> <p>oQuestion: As such, if current debt alone already exceeds the amount noted in clause (I), can it be understood to mean that firms are not eligible for the MSLP?</p> <p>oQuestion: As such, can it be understood to mean that EBITDA negative firms are not eligible for the MSLP?</p> <p>oQuestion: How is "existing outstanding but undrawn bank debt" defined and/or calculated?</p> <p>oQuestion: As such, can it be understood to mean the six times EBITDA leverage covenant applies to all types of debt, including mortgage debt for firms with real estate assets?</p>
4/16/2020 7:49:00 PM	PIO (Email from Sifer	Sifer	Kathleen	kathleen.sifer@us.gt.com	Grant Thornton	<p>Organizational Structures</p> <p>The following questions are in regard to the MSELF/MSNLF Required Attestations Section.</p> <p>oQuestion: Can you please define what it means for a company to "make reasonable efforts to maintain its payroll and retain its employees"?</p> <p>?How do such efforts pertain to hourly employees?</p> <p>?How do such efforts pertain to employees who have already been laid off or partially furloughed?</p> <p>?How do such efforts pertain to Eligible Borrowers who have made wage reductions across the entire firm?</p> <p>According to the MSELF/MSNLF Eligible Borrowers Section, "each Eligible Borrower must be a business that is created or organized in the United States or under the laws of the United States with significant operations in and a majority of its employees based in the United States."</p> <p>oQuestion: As such, can this be understood to mean United States' businesses with offshore companies are not considered separate entities?</p> <p>oQuestion: How is the "business of lobbying" defined?</p> <p>?If the primary function of the organization is lobbying, are they in the "business of lobbying"?</p> <p>?If a trade association has a lobbyist on staff, but their organization's primary function is not lobbying, are they eligible?</p>
4/16/2020 7:50:00 PM	PIO (Email from Devlin	Devlin	Kaitlin	Personal Email Address	AS220	<p>Non-profits, including higher education organizations, employ millions of American workers, have a huge economic impact, and have a massive impact generally on their local communities. Right now, they are providing essential services in those communities. Non-profits should be eligible for loans through the proposed Main Street Lending program. To illustrate the point, I work for an arts and culture non-profit in Providence, RI. Data compiled by the National Endowment of the Arts in 2018 found that the arts contribute \$763.6 billion to the U.S. economy, more than agriculture, transportation, or warehousing. The arts employ 4.9 million workers across the country with earnings of more than \$370 billion. Despite some temporary programmatic suspensions, my organization is still providing essential services such as housing to low income resident artists and much needed stipends to youth in our community, including incarcerated and formerly incarcerated youth, those who are pregnant and parenting, youth in foster care, and youth at high risk of school dropout and disconnection. Our services are needed more than ever during the COVID-19 pandemic. There is no valid reason not to include non-profit businesses such as ours in the Main Street Lending program, and not doing so potentially creates further financial burden on already chronically underfunded service providers.</p>

Main Street Lending Program Comments

<p>4/16/2020 7:50:00 PM</p>	<p>PIO (Email from</p>	<p>Sifer</p>	<p>Kathleen</p>	<p>kathleen.sifer@us.gt.com</p>	<p>Grant Thornton</p>	<p>Use of Eligible Loan                  According to the Federal Reserve’s April 9th, 2020 press release on the Main Street Lending Program, “The Federal Reserve established the Main Street Lending Program to enhance support for small and mid-sized businesses that were in good financial standing before the crisis...Firms seeking Main Street loans must commit to make reasonable efforts to maintain payroll and retain workers. Borrowers must also follow compensation, stock repurchase, and dividend restrictions that apply to direct loan programs under the CARES Act.”                  oQuestion: As such, can this be understood to mean Eligible Borrowers are not permitted to use Eligible Loans to make acquisitions?                  According to the MSELF/MSNLF Required Attestations Section, “The Eligible Borrower must attest that it will follow compensation, stock repurchase, and capital distribution restrictions that apply to direct loan programs under section 4003(c)(3)(A)(ii) of the CARES Act”                  oQuestion: As such, can this be understood to mean there are no exceptions for tax distributions of Eligible Borrowers who may be S-corporations or other pass-through businesses?                  oQuestion: As such, can this be understood to mean there are no exceptions for Eligible Borrowers who have an annual repurchase obligation to buy-back Treasury stock?</p>
<p>4/16/2020 12:00:00 AM</p>	<p>PIO (Email from</p>	<p>Silver</p>	<p>Todd</p>	<p>Personal Email Address</p>	<p>Village Property Management, LLC</p>	<p>Main Street Lending                  I am a small business owner as a landlord which owns retail spaces. Confidential Business Information                  Confidential Business Information                  I don’t see where I can apply for The Main Street lending program ?                  For the SBA or disaster relief fund programs I have reached out too many different banks and none of them can help me. They all suggest that I just go online. With Wells Fargo they finally sent me an email indicating I can now apply online and after applying online I then received a message saying they are out of funds on the SBA program and they suggest that I apply elsewhere.                  I do not have payroll per se, I am a K-1 recipient and deal with outside third party as far as management company and vendors. Confidential Business Information                  Any assistance or suggestions would be greatly appreciated of who I can talk to about Main Street Lending and other disaster relief programs that could be available to me. Confidential Business Information                  Please advise.                  Thank you,                  Todd Silver</p>

Main Street Lending Program Comments

4/16/2020 7:53:00 PM	PIO (Email from	Weber	Joseph	joseph.weber@thyssenkrupp.com	Thyssenkrupp NA	<p>As an employer with numerous manufacturing facilities across the United States, thyssenkrupp North America respectfully submits the following recommendations in connection with the Main Street New Loan Facility (“MSNLF”):</p> <p>1)Given the magnitude of the business interruptions and uncertainties facing middle market businesses with up to 10,000 employees in connection with the Covid-19 pandemic, the existing Maximum Loan Size of \$25 million is overly restrictive. We ask that the maximum loan size be increased to \$250 million.</p> <p>2)Since the MSNLF does not include a payroll support grant (such as the SBA Paycheck Protection Program), it is not reasonable, or even financially prudent, to require borrowers to make any specific payroll maintenance commitments.</p> <p>3)The compensation limits with respect to employees whose total compensation exceeds \$425,000 is overly restrictive, given the importance to the business and extraordinary efforts of many such employees during this exceptional crisis.</p> <p>Thank you for the chance to respond.</p> <p>Respectfully submitted,</p> <p>Joseph Weber Vice President, Finance and Accounting</p> <p>thyssenkrupp North America 111 West Jackson Blvd., Suite 2400 Chicago, IL 60604 Office: 312-525-2787 Cell Phone Number [REDACTED] Email: joseph.weber@thyssenkrupp.com</p>
4/16/2020 7:53:00 PM	PIO (Email from	Hallbick	Melissa	mhallbick@babcockcenter.org	Babcock Center, Inc.	<p>Support in the form of forgivable or no-interest loans should be offered to nonprofits with over 500 employees. We have seen both a decrease in funding and an increase in expenses, and our expectation is that this will continue. We already work on a slim budget and in order to continue to offer much needed services, we must be able to maintain staffing. Confidential Business Information [REDACTED]</p> <p>Additionally, we do not anticipate increases in future funding, and it will take some time to recover from this crisis, so any additional expenses in the form of interest could be difficult to manage.</p>
4/16/2020 7:53:00 PM	PIO (Email from	Cross	Ray	rcross@uwsa.edu	University of Wisconsin System	<p>On behalf of the University of Wisconsin System and our statewide Small Business Development Center (SBDCs) affiliates, we write with enormous gratitude for the federal government’s support through funding provided in the CARES Act, which provided much-needed regulatory and financial assistance to our students and universities. Our SBDC units have also been able to assist in delivering Economic Injury Disaster Loan and Paycheck Protection Program support to small- and medium-sized businesses. This has been a key driver in our effort to extend a vital economic lifeline to business owners who rely on expertise from our business development professionals. The high demand we have underscores the need for hardworking Americans to access relief as soon as possible. Unfortunately not every business is eligible for the Disaster Loans or Paycheck Protection Program offerings. Under current guidelines, the Federal Reserve “Main Street” lending facility excludes nonprofit entities, certain institutions of higher learning, and minority-serving institutions. These omissions are significant since these entities are ineligible to participate in the Paycheck Protection Program. As the Federal Reserve assesses eligibility requirements going forward, we strongly urge changes to make these programs more inclusive. We see such inclusion as a means to further energize and catalyze the prospects for recovery for a broader constituency of organizations represented in Wisconsin and nationwide.</p>

Note: At the commenter’s request, we removed the identifying information for commenters who were not notified at the time they made their comments that it was the Federal Reserve Board’s intention to make such comments public.

Main Street Lending Program Comments

4/16/2020 7:57:00 PM	PIO (Email from	Kelleher	Dennis	jgrimes@bettermarkets.com	Better Markets, Inc.	<p>Thank you for the opportunity to submit comments regarding the Federal Reserve's (FRB's) Main Street Lending Program facilities. Under these facilities, U.S. taxpayers, through the Federal Reserve, will purchase 95% participations in loans to eligible businesses, i.e. those w/ up to 10,000 employees or up to \$2.5 billion in annual revenue. The taxpayer funds being put at risk, in the middle of an economic crisis, must ultimately benefit Main Street, not be a means to fund executive bonuses or payouts to shareholders, investors or others with no benefit to the real economy, which occurred too often during the 2008 financial crisis. At a minimum, FRB must ensure the following:</p> <p>Transparency: FRB must ensure maximum transparency through prompt public disclosures of the terms, recipients and other beneficiaries of funds under these facilities as well as all fees and profits. The public has a right to know who its taxpayer dollars are benefiting and how.</p> <p>Compliance with key terms: FRB must require that participating banks have a robust process for ensuring that recipients comply with the attestations required under the terms of the facilities, including that the funds be needed because of COVID-19, that they retain employees, and that they comply with restrictions on compensation and capital distributions.</p> <p>Accountability: FRB must hold accountable any banks and recipients that fail to comply with their obligations by swift, meaningful and publicly disclosed penalties.</p>
4/16/2020 7:58:00 PM	PIO (Email from	Torres	Marie	rocgonzalez@altamed.org	AltaMed Health Services	<p>AltaMed Health Services is deeply concerned to learn that nonprofits are ineligible for the Federal Reserve's new "Main Street" lending facility, despite the fact that nonprofits are leading the effort to respond to this pandemic.</p> <p>AltaMed is committed to protecting our patients' health and we are leading efforts in Southern California to ensure patients have access to the testing they need during this pandemic at our clinics and urgent care centers. Our teams are in coordination with our local and state departments of public health and are following their recommended guidance, along with the guidance provided by the CDC at all of our clinic locations.</p> <p>Nonprofits like ours need access to these governments backed revenue streams and loan programs. The exclusion of non-profits is a particularly devastating blow for larger nonprofits who are ineligible for the Paycheck Protection Program lending option. Given the current financial crisis and loss of revenue, nonprofits, including critical health care entities, may be forced to shrink their services or even close, meaning tens of thousands could go without care. We urge the Federal Reserve to expand the eligibility of this program to explicitly include nonprofits.</p>
4/16/2020 7:58:00 PM	PIO (Email from	Ramos-Davidson	Cindy	cindyramosdavidson@ephcc.org	El Paso Hispanic Chamber of Commerce	<p>As a key resource for businesses, we are concerned that the program will leave small businesses unable to access its benefits. In order to better serve them, we recommend the following. The current thresholds of 10,000 employees and \$2.5 billion in revenue are high for small businesses, making it likely that they would be left out of the program. We recommend lowering the threshold to mirror SBA's size standards. The set date of April 8 for this program should be adjusted and set to March 1. This is the point when businesses began to apply for various loans and financial assistance. The proposal does not include CDFI's as lenders. However, they are crucial in supporting small businesses. These institutions should also be included in the program along with FinTech companies. The threshold of the minimum loan size of \$1 million will also leave many small businesses ineligible. Most of these businesses do not have loans of this size or are unable to qualify for them. As we look at making adjustments to this program to benefit small businesses the regulations for this program need to address whether or not this program will be applicable to SBA loans. These suggestions will help this program truly benefit small businesses. Providing them with access to the capital they critically need will make all the difference as we look to economically recover from this crisis. If you have any questions, please reach out to me at cindyramosdavidson@ephcc.org. Sincerely, El Paso Hispanic Chamber of Commerce.</p>
4/16/2020 7:59:00 PM	PIO (Email from	Shownes	Patrick	Patrick@gntv.info	Macon Urban Ministry	<p>We write in opposition to the exclusion of nonprofits, institutes of higher learning, and HBCUs from the Main Street New &amp; Expanded Loan Facilities. In short: The nonprofit sector is just as critical to economic stability and recovery as for-profit business. Georgia alone is home to over 300 nonprofit organizations with 500 or more staff members, each doing vital work during this unprecedented time, and each set to be left behind by this (and previous) relief efforts.</p> <p>As large employers alone, they deserve federal support - but they also supply critical services at a scale that would be impossible to replace; support an array of small businesses; and serve as economic anchors for their communities. In particular, HBCUs are critically important and uniquely endangered, and must be included in any and all relief packages available.</p> <p>We urge the Federal Reserve to make nonprofits eligible for the Main Street Loan program. The success of our nation's recovery from this unprecedented crisis depends on the success of our nation's nonprofits.</p>