

Proposal: 1712(AF86) Reg Q; Paycheck Protection Program Lending Facility and Paycheck Protection Program Loans

Description:

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Comment ID: 137244

From: Horizon Community Bank, Ralph Tapscott

Proposal: 1712(AF86) Reg Q; Paycheck Protection Program Lending Facility and Paycheck Protection Program Loans

Subject: Regulatory Capital Rule: Paycheck Protection Program Lending Facility and Paycheck Protection Progra

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Comments:

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Proposal: Regulatory Capital Rule: Paycheck Protection Program Lending Facility and Paycheck [R-1712]

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Your comment: We know there is guidance on how to treat, for regulatory capital requirements, the impact of PPP loans and the offset of the PPPLF. I would like guidance on treatment of just the PPP portion on the asset side of our balance sheet if we have not leveraged it by using the PPPLF. It seems some type of reprieve should be granted for banks that have not had to leverage the liability side of their balance sheet to promote this program.