



Banking Compliance

Paycheck Protection Program Issue-Focused Consulting

Advisory Services
for Large Lending
Institutions

A Review of PPP Originations for Potential Compliance Issues and Guidance on the Forgiveness Process

The Paycheck Protection Program (PPP) was launched quickly to provide rapid, much-needed relief to small businesses. An important consequence was that banks were given very little time to prepare. Lenders navigated unfolding program requirements, had to immediately support a large influx of borrower applications, and quickly needed to understand uncharted concepts, such as new and changing Small Business Administration (SBA) processes and special PPP loan forgiveness rules. Right now, lenders are getting up to speed on PPP loan forgiveness requirements and preparing for the inevitable examiner scrutiny of the PPP loans they made. That's why Wolters Kluwer® created consulting services focused specifically on advising lenders on regulatory concerns related to the PPP loan origination process and strategies for navigating the PPP forgiveness process. What's more, for larger, more complex institutions, these services are scalable and can be custom tailored to specific parts of the loan lifecycle.

Successfully Conclude Your Participation in the Paycheck Protection Program

Making loans under the PPP has been both grueling and rewarding. Engage with our Wolters Kluwer consultants to get you across the finish line. With our flexible pricing options, we give you the confidence you need with:

- A review of originated loans to determine compliance with BSA, UDAAP and fair lending requirements
- Thoughtful guidance on loan forgiveness rules



Consulting Services Tailored to PPP Loan Origination and Forgiveness Process Review

PPP Loan Origination Process Consulting Services Offering

Lenders could be challenged by their regulators, internal compliance reviews, internal and external audits, and customers potentially resulting in serious legal, compliance and reputational risk. Our consultants will assess PPP loans for fair lending concerns; potential unfair, deceptive, or abusive acts or practices (UDAAP) in the marketing and sale of the loans; and potential fraud or money laundering activities. Our consultants will provide:

- Customized analysis based on the institution's PPP workflow
- Insight as to how loans were marketed and sold in consideration of UDAAP and fair lending requirements
- Assessment of risks relative to potential fraud and compliance with BSA requirements

PPP Forgiveness Consulting Services Offering

Lenders will likely face challenges in computing the forgiveness amount, processing applications, servicing the non-forgiven portions of loans, and potential litigation by borrowers with unforgiven loans. Although the law includes an important "hold harmless" provision relating to SBA and forgiveness applications, banks will likely have other compliance concerns. Our consultants can provide guidance on operationalizing the forgiveness process, including: 1) determining the amount for forgiveness; 2) creating a consistent process for forgiveness applications and reviewing supporting documentation; 3) following up on incomplete documentation; and 4) communicating denials. Our consultants will review the entire PPP forgiveness process, identify gaps and provide:

- Guidance on PPP loan requirements and protocols for loan forgiveness
- Identification of missing or non-compliant documentation



Confidently Face Examiner Scrutiny and Avoid Potential Risk Exposure

Institutions of all sizes, scope and complexity should review their PPP processes for efficiency and compliance with regulations. Wolters Kluwer can help. Expectations are high, scrutiny is inevitable, and consequences are significant, especially when you consider:

- Examiner expectations that PPP loans were processed fairly, accurately, and in compliance with legal requirements
- Board of Directors and senior management need to understand processes and risk exposure
- Allegations of discrimination and other violations of law can harm an institution's reputation
- Mistakes during the loan forgiveness process expose banks to potential litigation from borrowers as well as regulatory scrutiny

Sensible, Scalable Pricing Structure for Targeted Guidance

Larger, more complex organizations will likely have a higher volume of PPP loans resulting in greater potential for compliance risk exposure and more involved forgiveness processes. Each client's needs are unique and should be evaluated based on information gained through scoping calls, discussions, and documented information provided. Our team can customize our consulting services for your institution.

For more information, contact your Wolters Kluwer Account Representative or call **800-261-3111**.

About Wolters Kluwer Governance, Risk & Compliance

Governance, Risk & Compliance (GRC) is a division of Wolters Kluwer, which provides legal and banking professionals with solutions to ensure compliance with ever-changing regulatory and legal obligations, manage risk, increase efficiency, and produce better business outcomes. GRC offers a portfolio of technology-enabled expert services and solutions focused on legal entity compliance, legal operations management, banking product compliance, and banking regulatory compliance.

Wolters Kluwer (AEX: WKL) is a global leader in information services and solutions for professionals in the health, tax and accounting, risk and compliance, finance and legal sectors. Wolters Kluwer reported 2019 annual revenues of €4.6 billion. The company, headquartered in Alphen aan den Rijn, the Netherlands, serves customers in over 180 countries, maintains operations in over 40 countries and employs 19,000 people worldwide.

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Contact information:

Wolters Kluwer
Governance, Risk & Compliance
28 Liberty Street
New York, NY 10011
+1-212-894-8940

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