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Please find any FAQs discussed in our webinar here: <https://www.onegroup.com/covid19-updates/>

### **Information from Thursday, April 30 Webinar:**

Good afternoon and thank you for joining OneGroup's informational update. My name is Alison Dunn. We are glad you could join us for our sixth update on the Coronavirus and various business-related impacts. We know there is a lot of information out there, and we appreciate you spending your time with us. Last week, we started the discussion about planning for employees to return to work and provided specific guidance. This week, we will continue with that focus and provide other timely updates as well. We have several of our experts with us today.

We have:

- Paul Coderre, Vice President of Risk Management Services
- Casey Cone, Senior Human Resources Consultant
- Nate Bradley, Employee Benefits Consultant
- Mike Tisdell, Vice President
- Dennis Ast, Senior Account Executive, Cyber Risk Specialist and
- Tod Hoffman, Senior Bank Liaison

We will be discussing updates to address our clients' frequently asked questions in the areas of:

- Risk Management and Claims
- Human Resources
- Employee Benefits, including
- Retirement Plans
- Cyber
- Small Business Relief

We do have to include our disclaimer – this is for informational and educational use only. Nothing in this discussion should be considered legal advice. Please consult with the appropriate attorney or advisor before addressing any situation raised in this discussion.

State and local governments are continuing to create their own frameworks to gradually lift stay-at-home orders, with important differences in each locality. In turn, employers are taking steps

now to prepare for reopening their physical workplaces and returning employees to work in offices and other facilities when it is appropriate to do so.

For today, we have structured this discussion to cover key updates and areas that our clients have been asking about. We also requested that participants share any questions with us before this discussion. Due to the number of participants on this call, we have muted all callers. If you have questions after this discussion, please reach out to your OneGroup contact. We will be posting content to our website, onegroup.com and there is a COVID-19 section on the main page that includes all of this information.

## Risk Management

Preparing for the return of workers:

- a. Reassembling the management team
  - i. New Infection Control Protocols
  - ii. Work space
  - iii. Personnel
- b. Building the return strategy
  - i. What/Who comes in first
  - ii. Reconnecting with customers
  - iii. Scheduling production
  - iv. Personnel demands / scheduling
  - v. Pay / benefits (Changes?)
- c. Preparing the facility
  - i. Cleaning & Sanitizing
  - ii. Reinitiating / restarting - services, utilities, etc.
  - iii. Equipment - Recalibrating, inspecting, servicing, etc.
- d. Developing new procedures and programs
  - i. Fitness for duty screening – provisions to make sure those coming in aren't infected, and what to do if they are (or are suspected to be).
  - ii. Personal hygiene programs – maintaining a high level of personal hygiene to ward off transfer of virus
  - iii. Workplace and Social distancing – maintaining distances in operations, break areas and public areas.
  - iv. Personal Protective Equipment (PPE)
  - v. Visitors/vendors/contractors – limiting access and interaction wherever possible to minimize the potential of virus spread.
  - vi. Facility access / egress – changes to who gets in, and who goes where.

- vii. Changes to discipline program related
- viii. Response to symptoms and confirmed cases
- e. Preparing employees for return
  - i. Communication
    1. Verification of intent to return
    2. Communication of RtW Plan, program changes / additions
    3. Communication of work scheduling

## OSHA Recordkeeping

### 1) Recordkeeping vs Reporting

#### a) Recordkeeping

- i) OSHA 300 Log; OSHA 300a Summary; OSHA 301
- ii) Recordkeeping for Covid-19 Cases
  - (1) Positive Test
  - (2) Work Related
  - (3) Treatment beyond first aid, and/or
  - (4) Lost time
- iii) Gray Areas
  - (1) Work Relatedness – difficult to determine in some cases
    - (a) OSHA presumption: Healthcare vs. non-healthcare
  - (2) Positive Test – CDC Definition

#### b) Reporting

- i) Fatalities and Hospitalizations
- ii) Fatalities – must report w/l 8 hours of notification
- iii) Hospitalization – must report w/l 24 hours of notification
- iv) Reporting a case will involve an interview and the completion of additional investigative information.
  - (1) Currently, OSHA is not doing on-site investigations so you will be asked to complete a written investigation.
- v) Failure to report can result in a fine of \$5,000.

\*\*Addendum to Reporting requirements (as of 5/4/2020):

29CFR1904.39b (6) stipulates that reporting is required if:

- The hospitalization takes place within 24 hours of the incident.
- The fatality takes place within 30 days of the incident.

## Human Resources

### Frequently Asked Questions

Q: What if an employee is fearful to come into the workplace?

A: The answer depends on the specifics of each situation and should be determined on a case-by-case basis. There can be a variety of factors to consider:

Policies – Time off (paid versus unpaid as typically, in situations where an employee takes time off, either in full or partial days, but does not request to use his or her vacation benefits, the employer's policy will determine whether time off benefits will automatically be deducted when available), FMLA or other leaves of absence, attendance, and in some cases, disciplinary policies

Regulations (information provided by SHRM.org)

#### OSH Act

Employees can refuse to work if they reasonably believe they are in imminent danger, according to the Occupational Safety and Health (OSH) Act. They must have a reasonable belief that there is a threat of death or serious physical harm likely to occur immediately or within a short period for this protection to apply.

An employee can refuse to come to work if:

- The employee has a specific fear of infection that is based on fact—not just a generalized fear of contracting COVID-19 infection in the workplace.
- The employer cannot address the employee's specific fear in a manner designed to ensure a safe working environment.

#### NLRA

The National Labor Relations Act (NLRA) grants employees at unionized and nonunionized employers the right to join together to engage in protected concerted activity. Employees who assert such rights, including by joining together to refuse to work in unsafe conditions, are generally protected from discipline.

#### ADA

Employers should accommodate employees who request altered worksite arrangements, remote work or time off from work due to underlying medical conditions that may put them at greater risk from COVID-19.

The EEOC's guidance on COVID-19 and the Americans with Disabilities Act (ADA) notes that accommodations may include changes to the work environment to reduce contact with others, such as using Plexiglas separators or other barriers between workstations.

#### FFCRA

If a health care provider advises an employee to self-quarantine because the employee is particularly vulnerable to COVID-19, the employee may be eligible for paid sick leave under the Families First Coronavirus Response Act (FFCRA). The FFCRA applies to employers with fewer than 500 employees (generally), and the quarantine must prevent

the employee from working or teleworking. Please note there are additional reasons someone may qualify for FFCRA.

CDC – recommends flexibility - The CDC advises employers to "ensure that your sick leave policies are flexible and consistent with public health guidance and that employees are aware of these policies."

In addition to this – it is generally recommended to explore all available options for employees to reduce their risk to the virus. This could include working from home, splitting shifts to avoid employee contact with one another, or reducing hours (which may make employees eligible for unemployment, depending on individual circumstances).

Generally, as a first step, an employer could respond to a worker who's expressing fears of returning to work by starting with a conversation to better understand their concerns. Some of the concerns could have already been addressed by the employer by measures put in place (i.e. temperature checks, rearranging work stations to ensure 6 feet distance, requiring masks of employees and/or visitors, not allowing visitors, etc.), or it could be determined that additional steps are needed.

Frequent, ongoing communication is important as it is suggested that an employer should inform employees and ensure they are aware of all measures the employer is taking to maintain a safe workplace.

Situations should generally be handled on a case-by-case basis, as there regulations that could come into play (as referenced above).

There are several factors to consider, however, hopefully, beginning with a conversation with the individual should help indicate what the appropriate next steps should be.

Source: <https://www.shrm.org/ResourcesAndTools/legal-and-compliance/employment-law/Pages/coronavirus-when-scared-workers-do-not-report-to-work.aspx>

### **Questions relating to Unemployment Insurance**

The CARES Act provided additional benefits to unemployed workers including extending the benefits by an additional 13 weeks, added categories of qualifying reasons for benefit eligibility, and an additional \$600 per week to those receiving benefits through the end of July 2020. As a result, some individuals could receive the same or even more from a monetary standpoint while on unemployment than when they were working.

As such, we are receiving questions from many clients, concerned about workers not wanting to return to work as businesses look to re-open.

As always, the state makes the decision on unemployment eligibility on a case-by-case basis, specific to each claimants' situation.

According to information provided by the NY DOL, "If you are able to reemploy an individual, contact the individual directly. If the claimant refuses rehire or fails to report to work, you can notify the Department of Labor directly in writing.

NYS Department of Labor  
PO Box 15130  
Albany, NY 12212-5130  
or fax to: (518) 402-6175

An employer can also notify the Department of Labor directly to communicate the beginning of the recall.

As a reminder, the state makes the ultimate decision on unemployment eligibility on a case-by-case basis, specific to each claimants' situation. An employer should never indicate if someone will or will not be eligible for UI, as the state makes the final determination in all cases.

FAQ provided by NY:

**Q: I am an older worker and/or am immuno-compromised. I work near a lot of people and am personally uncomfortable going to work due to concerns about my health. Am I eligible for Unemployment Insurance?**

A: Generally speaking, you are not eligible for unemployment insurance if you voluntarily leave your job. Before leaving work, please consider speaking with your employer for alternatives that may be available such as using sick time or annual leave, requesting a reasonable accommodation such as working remotely, asking your employer for a leave of absence, or seeking temporary disability benefits. If alternative options are not available, you may file a claim for unemployment insurance. You should consider obtaining medical documentation that identifies any work restrictions and submit that with your claim. If you are found ineligible for unemployment insurance benefits, you may be eligible for benefits under PUA.

<https://labor.ny.gov/ui/pdfs/ui-covid-faq.pdf>

FAQs provided by the DOL:

**Q: My employer has remained open because it is essential. I'm not sick, nor is anyone in my household sick. I do not have children or care for someone who cannot care for themselves. However, I'm afraid of getting coronavirus from customers coming to the store, so I quit and filed for unemployment. Can I obtain benefits under the CARES Act?**

A: No. Under the CARES Act, you may be eligible for benefits if you meet one of the circumstances listed in the Act, but none include the scenario described. On these facts, you are not eligible for Pandemic Unemployment Assistance (PUA) because you do not meet any of the qualifying circumstances.

There are, however, circumstances under the CARES Act in which specific, credible health concerns could require an individual to quit his or her job and thereby make the individual eligible for PUA. For example, an individual may be eligible for PUA if he or she was diagnosed with COVID-19 by a qualified medical professional, and although the individual no longer has COVID-19, the illness caused health complications that render the individual objectively unable to perform his or her essential job functions, with or without a reasonable accommodation. However, voluntarily deciding to quit your job out of a general concern about exposure to COVID-19 does not make you eligible for PUA. If you believe your employer's response to the possible spread of COVID-19 creates a serious safety hazard or if you think your employer is not following OSHA standards, you can [file a complaint with the Occupational Safety and Health Administration](#).

As a general matter, you are likely to be eligible for PUA due to concerns about exposure to the coronavirus only if you have been advised by a healthcare provider to self-quarantine as a result of such concerns. For instance, an individual whose immune system is compromised by virtue of a serious health condition, and who is therefore advised by a healthcare provider to self-quarantine in order to avoid the greater-than-average health risks that the individual might face if he or she were to become infected by the coronavirus will be eligible for PUA if all other eligibility requirements are met.

**Q: I was furloughed by my employer, but they have now reopened and asked me to return to my job. Can I remain on unemployment?**

A: No. As a general matter, individuals receiving regular unemployment compensation must act upon any referral to suitable employment and must accept any offer of suitable employment. Barring unusual circumstances, a request that a furloughed employee return to his or her job very likely constitutes an offer of suitable employment that the employee must accept.

While eligibility for PUA does not turn on whether an individual is actively seeking work, it does require that the individual be unemployed, partially employed, or unable or unavailable to work due to certain circumstances that are a direct result of COVID-19 or the COVID-19 public health emergency. In the situation outlined here, an employee who had been furloughed because his or her employer has closed the place of employment would potentially be eligible for PUA while the employer remained closed, assuming the closure was a direct result of the COVID-19 public health emergency and other qualifying conditions are satisfied. However, as soon as the business reopens and the employee is recalled for work, as in the example above, eligibility for PUA would cease unless the individual could identify some other qualifying circumstance outlined in the CARES Act.

**Q: One of my workers quit because he said he would prefer to receive the unemployment compensation benefits under the CARES Act. Is he eligible for unemployment? If not, what can I do?**

A: No, typically that employee would not be eligible for regular unemployment compensation or PUA. Eligibility for regular unemployment compensation varies by state but generally does not include those who voluntarily leave employment. Similarly, to receive PUA, an individual must be ineligible for regular unemployment compensation or extended benefits under state or federal law, or pandemic emergency unemployment compensation, and satisfy one of the eligibility criteria enumerated in the CARES Act, as explained in [Unemployment Insurance Program Letter 16-20](#). There are multiple qualifying circumstances related to COVID-19 that can make an individual eligible for PUA, including if the individual quits his or her job as a direct result of COVID-19. Quitting to access unemployment benefits is not one of them. Individuals who quit their jobs to access higher benefits, and are untruthful in their UI application about their reason for quitting, will be considered to have committed fraud.

If desired, employers can contest unemployment insurance claims through their state unemployment insurance agency's process.

<https://www.dol.gov/coronavirus/unemployment-insurance>

## **Return to Work Considerations – Planning**

We have previously discussed several areas of consideration, and at this time, we wanted to expand on some of the areas.

### 1. Recall policy

Ensure fair, non-discriminatory policy/procedure in place.

- Generally, an employee recall process should be a documented policy/process and the decisions to recall employees should be based on business-related, non-discriminatory criteria, such as length of service.
- Determine your policy and criteria in advance, and administer the policy consistently when ready to begin to call employees back.

### 2. New-hire paperwork

Furloughed employees who remained on the payroll and were not terminated from employment generally would not need to complete all new hire paperwork. Those placed on lay off and terminated from the company, would generally need to complete most, if not all, new hire paperwork, as required.

As a reminder:

- In NY, wage acknowledgement notice is required upon hire; if employee was placed on layoff and therefore terminated, when return they are considered as a new hire and must receive wage acknowledgement form. Also if any changes in pay, frequency, amount, status (i.e. exempt/non-exempt) – should receive a notice.
- Inform employees of current time off accruals (some may have received a pay out of time, some may not have continued to accrue time, some may have used time).

## Benefits

### Potential Health Insurance Plan Costs (Self-Insured Plans)

Some analysts (Willis Towers Watson) think self-insured employers' healthcare costs could rise by as much as 7% this year, depending on how far the virus spreads and how deadly the outbreak proves to be.

This estimate is dependent on a significant amount of the group's population becoming infected and seeking treatment.

On the low end of the estimate, should 10% of the population be infected and prove to have low morbidity, costs will increase by under 1%. However, if the virus infected 50% of the population with high morbidity, costs could increase by 6.8%, the study found.

The analysts noted that the increases related to COVID-19 would be in addition to an expected 6% increase in costs for the year.

### The size of 2021 premium increases will likely depend on:

- Effectiveness of policies to mitigate the spread of the virus
- Potential for new waves of COVID-19 infection
- Costs of a vaccine or therapeutic agents

### Common Coronavirus Costs Estimates:

- **Test to diagnose:** \$50 to \$95.
- **Administration of the test:** \$100 if performed in a doctor's office, up to \$1,000 if performed in an emergency room, with costs varying by region.
- **Admission and treatment in a hospital:** \$10,000 per day with an average stay of 10 days.

Patients with asthma or other respiratory issues, or chronic conditions such as diabetes, are more likely to need more intense and expensive care.

Willis Towers Watson estimates that employer costs per infection would also range depending on the severity:

- \$250 for a mild case,
- \$2,500 for a moderate case
- \$30,000 for a severe case that requires hospital admission.
- \$100,000 should an employee develop a catastrophic case of COVID-19 requiring a stay in an intensive care unit.

Fully-insured groups will not see an impact until late 2020 or 2021 renewals. Prospectively rated groups, those with over 100 enrolled, will be partial rated based on how COVID-19 impacts their actual population, whereas those in the under 100 market will be more impacted by how COVID-19 hits their region.

### **Another View: Lower Health Care Costs Ahead**

Actuaries/analysts at Gallagher and Milliman are predicting a decline in health care costs (up to \$575 billion) this year. The reason being that unnecessary surgeries/procedures will be tabled for the foreseeable future, and the government is likely to pick up most COVID-19 expenses.

While extended hospital stays, particularly in intensive care units, can rack up massive bills for individuals, that pales compared to the savings from millions of Americans delaying care. Those savings also outpace the costs to insurers of waiving COVID-19 related co-pays, deductibles, tests and other care, which most insurers have agreed to waive.

Most of the country has been under stay-at-home orders, and many non-emergency care visits and elective procedures have been canceled to help hospitals manage the surge of coronavirus patients.

HCA Healthcare Inc. (the largest U.S. for-profit hospital operator) said it has seen a 70% drop in outpatient surgeries so far in April compared with a year ago, while inpatient admissions declined 30%.

Ultimately, the magnitude of cost reductions will depend on how long care is deferred, and if there is a second wave of infections, that could offset some of the estimates. Regardless of the scenario, Milliman expects COVID-19 will actually reduce U.S. health care expenditures in 2020.

Actuarial analysis by Gallagher for similar crises, typically natural disasters, show that lack of access to healthcare facilities or providers has resulted in short-term claim reductions for scheduled and non-urgent care. In these instances the analysis has consistently shown that close to 50 percent of those variable claims never show up back in the health care system and that

there is not a dollar for dollar pent up need for care that will emerge once we get back to business as usual.

The last significant component of cost projections will be the overall infection rate of the population, the infection rate of an employer's workforce, the severity of the cases, and subsequent hospitalization of employees. Many of the models may be too heavily weighted at 30 percent to 50 percent infection rates. Gallagher's model reflects a more likely estimate of the total infections that will actually impact health plan cost in a range of 4 to 7 percent.

## Retirement

We've been tracking the data as it becomes available to us, so I wanted to share a few of those numbers with all you today. The data that we have seen thus far indicates that about half of large and mid-size retirement plans have adopted at least one of the CARES Act provisions (loans and/or distributions). A very positive sign thus far is that participant usage of a coronavirus loan or distribution, in plans that added the provisions, has been very low across all industries, with the highest usage % coming from plans in the travel, hospitality, and food services industry – within those industries the numbers are still low - only about 1%. Obviously, the provisions have only been available for a few weeks now, but the low usage numbers thus far certainly brings about an optimistic tone – especially if the economy is steering closer to reopening and some sense of normalcy is around the corner.

It's no surprise that the average 401(k) & 403(b) lost ground in Q1 2020 —BUT not only did most 401(k) savers not reduce contributions, according to Fidelity, roughly 15% of plan participants actually increased their contributions. Additionally, the average employer contribution was steady at 4.7%, a slight increase from 4.6% in the previous quarter and consistent with 4.7% in Q1 2019. With regard to investment allocation, the data from Fidelity, highlights that only 7.3% of individuals made a change to their 401(k) allocation in Q1, though that was an increase from 5.2% in Q4 2019. Of those savers that made a change to their asset allocation, 60% made only one change in the quarter.

Numbers are very similar coming out of T. Rowe Price – which we received this morning. T. Rowe Price – which is the recordkeeping platform for roughly 5,700 retirement plans covering more than 2 million plan participants. Of those plan participants, roughly 97% have stayed the course and have not changed their investment allocation. And less than 2% of employers are suspending or reducing the employer match.

Again, these numbers are very optimistic and highlight the importance of timely, consistent and repeatable education and guidance for plan participants. It's worked in the past, and it's working now. The data reflects this. Employees are staying the course. Participant education content - such as webinars, podcasts, digital hub materials—are being consumed on average

300% more than prior benchmarks. These trends in communication(s) will undoubtedly become more prevalent in the future. Our firm continues to evaluate how we can further support participants during this time, through our current education resources, but also to enhance our offerings as we prepare to get back to the office. We've always hosted Zoom meetings with plan participants who are out of state. We anticipate Zoom meetings becoming more popular for local participants in the future as well. Video content and communications to plan participants have increased and have played a pivotal role in sending out timely updates that are not simply PDF files for employees to read. Lastly, our bi-weekly live market-update calls over the past couple of months have had a very positive turn-out and we anticipate continuing these on a routine basis as we return to work as well. Our next call is Thursday, May 7 at 10:30 AM - hosted by Fidelity Investments. Again, these are open for all plan sponsors and plan participants to join. If you'd like to join or think your employees would benefit from the discussion – send us an e-mail [Support@OneGroupRA.com](mailto:Support@OneGroupRA.com) and we will pass on the WebEx information.

## Cyber

- Uptick in cyber events – Complaints up 300% over the past month – FBI IC3 from 1,000 daily to as many as 4,000 daily
- Cyber Criminals are opportunistic, preying on people's fear and curiosity
- Shifting from fake domains to potentially Phishing, malware and ransomware
- Targeted coronavirus Phishing & Smishing campaigns – WHO, CDC, Govt Agencies, etc..
- Fake cures, treatments, donations, general misinformation to take advantage and psychological manipulation of people
- Social Media –Malicious Links, don't click enter website yourself
- FBI seeing increased activity in Hospitals and Medical Research – looking to steal treatment and vaccine research
- DOJ said it will prioritize and prosecute coronavirus scams and fraud
- Google noted at least a dozen foreign government back groups active in cyber-attacks mostly phishing and malware – 18M daily coronavirus related phishing/malware emails
- Increase utilization of remote workers presents new exposure

### Practice Good Cyber Hygiene

- Employee Training – Think Before Clicking – Don't Panic
- Multifactor Authentication & Utilization of a VPN
- Use Strong Passwords or Pass Phrases
- No public Wi-Fi
- Secure Mobile Devices

- Install/Update Anti-Malware (Next Gen)
- Stay current with patching/updates
- Risk Assessment (Know what you have) NIST Framework
- Back-up, Test it, Air Gap
- Vendor Management – Beneficial Contracts
- **Cyber Response Plan – Who do you call first?**

## Small Business Relief

1) The new legislation for \$484 billion in additional funding was signed into law last Friday.

\$310 billion was approved for the PPP program and the new money will be issued by the Banks to those with approved but unfunded applications via the same terms & conditions already in place.

2) As the first wave of loan closings are now taking place, questions are now turning to how to calculate the loan forgiveness portion of the borrowed funds.

And has been the case with many aspects of the program the answers to those questions remain unclear, even more so than those associated with the application phase.

The SBA was to issue additional guidelines before month end but that has not happened.

*Remember to discuss these matters with your CPA and your bank.*

### **When does the 8 week measurement period begin?**

The 8-week measurement period for debt forgiveness begins is on the date the lender makes the first disbursement of the PPP loan to the borrower, not the date on which the borrower is notified that they have been approved or the loan closed

### **What costs are allowed to be included when determining debt forgiveness?**

Under the CARES Act, an employer can receive debt forgiveness on a PPP loan for eligible amounts equal to the costs incurred and payments made during the covered period.

The literal reading of that statement suggests that not only must the payments be made during the covered period, which is the 8 weeks after the lender made the disbursement to the borrower, but they also must be incurred during that same 8-week period. That definition limits what money can be used for and more importantly what can be forgiven. Likely it was one or the other but it remains to be clarified.

### **Which costs are eligible for debt forgiveness?**

Payments of interest on any covered mortgage obligation – How do we define Mortgage Obligation – if you are like me that means a loan secured by a parcel of real estate, typically your home, but the meaning as defined under the PPP is a loan secured by real property – vehicles, equipment, etc. Talk to your CPA as this could broaden your use of funds allowance.

Also keep in mind that interest on covered mortgage obligations does not include mortgage prepayments or principal payments.

Remember not more than 25% of the forgiven amount may be for non-payroll costs. If it is you have to repay it.

You will also owe money if you do not maintain your staff and payroll – show a decrease in full-time employee equivalents (FTEE's) during specific testing periods and for salary reductions of greater than 25 percent for employees

Numerous calculation worksheets on the net being put out by CPA's but accuracy is still a question - check with your bank and or CPA first.

The CARES Act specifically states eligible recipients seeking loan forgiveness must submit an application to the lender that is servicing the PPP.

Such an application will need to include:

- Documentation verifying # of FTE's and corresponding payroll amounts.
- Documentation, including canceled checks, payment receipts, transcripts of accounts, verifying payments on mortgage obligations, lease obligations, and utility payments.
- A certification that the documentation presented is true and correct; and used for the purposes intended

Good recordkeeping and bookkeeping will be critical for getting your loan forgiven.

Recommend that you place the loan proceeds in a separate bank account and carefully track all expenditures over that 8 week period and frankly before and after in case.

Your lender will likely require these documents in digital format, and the bank will have 60 days to respond.