

March 31, 2020

Mr. Andrew Olmem
Deputy Director
The National Economic Council
1650 Pennsylvania Ave NW
Washington, DC 20502

Re: Small Business Lending under the CARES Act

Dear Mr. Olmem:

The American Financial Services Association (AFSA)¹ strongly supports the Small Business Administration's (SBA) Paycheck Protection Program (PPP) that is part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). The PPP is the most important provision in the new stimulus bill for most small businesses. AFSA and its members are anxiously awaiting the regulations that will implement the PPP and get loans into the hands of small businesses as soon as possible. As policymakers draft these regulations, we hope you will consider the two requests outlined below.

First, we ask that policymakers consider the needs of the thousands of small business auto dealers across the country. AFSA's members include vehicle finance companies who regularly lend to these dealers. The quickest way to get loans to small business dealers is through the finance companies that are already lending to them. We encourage you to ensure that vehicle finance companies can quickly qualify to become SBA lenders and participate in the PPP.

Second, we hope that policymakers will clarify which financial institutions are eligible to receive loans through the PPP. As the law is written, it is unclear whether financial services companies qualify for the PPP if they have under 500 employees or whether they must have under 500 employees *and* less than \$35.5 million in annual receipts. We believe that the law specifies the former, but clarification would be helpful.

Thank you so much for everything you are doing for America's small businesses. We are happy to help in any way possible. Please contact me at 202-466-8616 or bhimpler@afsamail.org with any questions.

Sincerely,



Bill Himpler
President & CEO
American Financial Services Association

¹ Founded in 1916, AFSA is the national trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA members provide consumers with many kinds of credit, including traditional installment loans, mortgages, direct and indirect vehicle financing, payment cards, and retail sales finance.