



PPP loan forgiveness services matrix

As of May 27, 2020



An entity or the entity's lender may ask the CPA to assist in the Paycheck Protection Program (PPP) loan forgiveness process. For example, the CPA might be asked to provide assurance or other services related to an entity's documentation of expenses related to PPP forgiveness. Below is a chart to help the CPA determine what service might be provided given the ongoing or concurrent service relationship the CPA has with the entity.

What CPA service is being provided for PPP loan forgiveness (Section 1106 of the CARES Act)?	What is the ongoing or current service relationship with entity?		
	It's a client advisory services (CAS) client	It's a tax advisory or preparation client	It's an audit/attest/review client
None: <ul style="list-style-type: none"> • CPA is providing no service 	<ul style="list-style-type: none"> • Entity self-certification letter template 	<ul style="list-style-type: none"> • Entity self-certification letter template 	<ul style="list-style-type: none"> • Entity self-certification letter template
CPA is performing a transaction advisory (Consulting) engagement: <ul style="list-style-type: none"> • Assisting client with calculations and documentation gathering • Allows for client self-certification • Performed under CS Section 100 <ul style="list-style-type: none"> – Documented understanding of engagement – Communication of results generally intended for client use only • Does not fall within the scope of peer review 	<ul style="list-style-type: none"> • Engagement letter and written communication option* • Independence not required 	<ul style="list-style-type: none"> • Engagement letter and written communication option* • Independence not required 	<ul style="list-style-type: none"> • Engagement letter and written communication option* • Independence: must comply with AICPA Code Section 1.295 to perform existing assurance service

1 PPP loan forgiveness services matrix

*The sample engagement letter is being provided courtesy of the [AICPA Member Insurance Program](#), and you will be directed to a different site. The information is produced and provided by CNA.

What CPA service is being provided for PPP loan forgiveness (Section 1106 of the CARES Act)?

What is the ongoing or current service relationship with entity?

CPA is performing an Agreed-Upon Procedures (AUP) engagement:

- Performed in accordance with [AT-C Section 215](#)
- AUP report can be
 - Restricted to use by client only
 - Restricted to use by client and lender only
 - **General use**
- CPA can be engaged by either the client or the lender
- Procedures can be agreed to by client, lender or both
- Falls within scope of peer review

It's a client advisory services (CAS) client

- [AUP engagement letter \(client/borrower\)](#)
- [AUP engagement letter \(lender\)](#)
- [Report example 1 \(client/borrower\)](#)
- [Report example 2 \(client/borrower\)](#)
- [Report example 3 \(lender\)](#)
- [Report example 4 \(lender\)](#)
- [Attachment to engagement letter or AUP report](#)
- **Independence: must comply with AICPA Code Sections [1.200.001](#), [1.297.010](#) and [1.297.020](#) to perform AUP service**

It's a tax advisory or preparation client

- [AUP engagement letter \(client/borrower\)](#)
- [AUP engagement letter \(lender\)](#)
- [Report example 1 \(client/borrower\)](#)
- [Report example 2 \(client/borrower\)](#)
- [Report example 3 \(lender\)](#)
- [Report example 4 \(lender\)](#)
- [Attachment to engagement letter or AUP report](#)
- **Independence: must comply with AICPA Code Sections [1.200.001](#), [1.297.010](#) and [1.297.020](#) to perform AUP service**

It's an audit/attest/review client

- [AUP engagement letter \(client/borrower\)](#)
- [AUP engagement letter \(lender\)](#)
- [Report example 1 \(client/borrower\)](#)
- [Report example 2 \(client/borrower\)](#)
- [Report example 3 \(lender\)](#)
- [Report example 4 \(lender\)](#)
- [Attachment to engagement letter or AUP report](#)
- **Independence: already maintained**

Additional consideration: Providing PPP loan services (original application or forgiveness) to both a lender and a borrower could create a conflict of interest and confidentiality issues. If you believe you have a conflict of interest and you can't put safeguards in place to eliminate or reduce the threats to an acceptable level, you should serve one client or the other, but not both. If you can eliminate or sufficiently reduce the conflict of interest threats and serve both clients, you should disclose your relationship to both clients, communicate the safeguards you've applied and got both clients' consent to proceed. If one of your clients will not consent, you can't provide the services to both clients. With respect to confidentiality, the lender and the borrower are separate clients and you should not disclose confidential client information of either client to the other without consent of the client whose confidential information is to be disclosed.

Note: The AICPA® has additional resources relating to the PPP at aicpa.org/sba, including an overview of the [forgiveness calculation steps](#) and [PPP loan forgiveness calculator](#).

Disclaimer: The AICPA anticipates making updates to the contents of this resource to incorporate future changes related to the PPP loan forgiveness process, AICPA Professional Standards, and best practice recommendations, as necessary.

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