Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Coronavirus (COVID-19)	PIO (Email from Web)	6/22/2020 12:00:00 AM	Connell	Brian	brian.connell@lls.org	Leukemia & Lymphoma Society	June 22, 2020 The Honorable Jerome H. Powell Chair Board of Governors of the Federal Reserve System 20th Street & Constitution Avenue NW Washington, D.C. 20551 Re: Comments to the Federal Reserve from the Leukemia & Lymphoma Society Dear Chairman Powell: The mission of The Leukemia & Lymphoma Society (LLS) is to cure leukemia, lymphoma, Hodgkin's disease, and myeloma and improve the quality of life for the more than 1.4 million people in the United States living with blood cancer, and their families. To ensure they receive appropriate and timely care, LLS works to guarantee that blood cancer patients have access to treatments and resources as they and their families navigate their illness. LLS has teams of professionals that help patients identify resources, including financial aid during the COVID-19 pandemic, clinical trials, and support services. Additionally, LLS works to advance new diagnostics and treatments and has invested more than $1.3 billion in cancer research resulting in dozens of new treatment options for blood cancer patients. In our most recent fiscal year, LLS invested $283.9 million in our mission-bolstering research, education and support, and policy and advocacy initiatives for blood cancer patients and their families. In 2019, LLS dedicated $47.4 million to support scientific research grants to advance the science of prevention, detection, and treatment of the blood cancers. In 2019, LLS provided 35 new grants to help bolster promising young scientists through our Career Development Program-an initiative that has supported three researchers who have gone on to win a Nobel Prize. In 2019 alone, LLS's Information Resource Center specialists responded to more than 20,000 inquiries from patients and caregivers, and LLS clinical trial nurse navigators provided in-depth clinical trial and navigation support to more than 600 patients. To combat the financial burden of cancer care, in 2019, LLS provided patients with direct financial assistance totaling over $100 million to help patients with both urgent and ongoing costs related to their treatment. LLS also invests in empowering volunteer advocates to change federal and state public policies that impact cancer patients and survivors. While LLS continues to support our community during the economic downturn, our organization has also been deeply impacted. Like many of our patients, LLS has seen a decrease in overall revenues while demand for patient services, patient financial support, and other programs has increased. On behalf of the patients, families, and caregivers affected by the blood cancers, we welcome the opportunity to submit comments to the Federal Reserve about the Nonprofit Organization Loan Facilities. As drafted, the proposal appears to be designed more for transactional nonprofits such as hospitals and institutions of higher education, in contrast to charitable nonprofits like LLS that rely on donations from the public to support their missions. Indeed, many nonprofits, including LLS, pride themselves on offering their services at no charge. Even as all types of charities are inherently organized around a public mission, the dramatic variation in business models makes many of the financial requirements included in this proposal inapplicable to organizations that predominantly rely on donations. With that in mind, LLS respectfully requests the Federal Reserve to address the concerns and proposed changes we have outlined below. 1. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits like LLS have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making the Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by many nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though we face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, we are straining to meet increased demand in our communities on the frontlines, providing services for cancer patients and other vulnerable groups, advancing policies that keep patients healthy, and keeping our communities connected. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees have been severely impacted by this health

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to allow such a vital part of the economy to be neglected as we respond to this crisis. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness in the next round of COVID-19 relief legislation. 2. The Fed's Proposal Disqualifies Many in the Charitable Sector by Limiting Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations The Federal Reserve's criteria that organizations must receive no more than 30% of revenues from donations would disqualify many charities, including LLS. Overall, this loan facility seems more applicable to educational institutions and nonprofit hospitals, but not most charitable organizations. In 2019, LLS received the vast majority of our revenue from donations. We receive donations from individuals, foundations, corporations, and others to fund medical research, operate clinical trials, offer patient support programs, provide financial assistance for patients, and advocate for blood cancer patients. Our organizations provide vital services for individuals living with, or recovering from, blood cancer, and pride ourselves on the fact that donations we receive are rooted in our donors' trust and support for our stewardship of their donations. The reliance of the charitable sector on donations to serve our communities should not preclude us from securing support from stimulus initiatives intended to bolster the economy. LLS is also concerned that the proposed criteria appears to be in direct conflict with existing federal statuary requirements. Specifically, in order to retain tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, charitable nonprofits must meet a "public support" test showing they receive at least a third of their revenues via contributions from the general public, contributions or grants from other public charities, or from governmental agencies. If a charitable nonprofit fails to do so, then it carries the added burden of providing additional facts and circumstances to prove that it is a publicly supported organization. We urge the Federal Reserve to remove these requirements in order to align with statutory assumption that nonprofits will rely substantially on donations, in order to ensure that nonprofit organizations like LLS are not precluded from receiving loans that would support the continuation of our mission. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations, and instead make 501c(3) organizations that are otherwise meet the employee size are eligible. 3. The Fed Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically operate on low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring 30 days cash on hand and setting a loan origination ratio of 40-50% (down from 65% as proposed).

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be off-putting for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: We urge that the loan terms including interest rate and balloon payments be revisited to reflect the lowest permissible rate, such as the 0.5% rate initially proposed for PPP loans. In addition, we are concerned that the balloon payment requirement would prevent charities from fulfilling their mission in the year the balloon payment is due. 4. "Reasonable Efforts" Regarding Employee Retention Require Further Clarification The description of "Retaining Employees" in the draft term sheet requires refinement if the Federal Reserve expects nonprofits to take advantage of this facility. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation: "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in with the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. One option would be to add the qualifier "mission-based" before "reasonable efforts." Recommendation: The terms "maintain its payroll" and "retain its employees" are vague and need further refinement. We ask the Federal Reserve to make clear that nonprofits participating in the Main Street loan program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. Recommendation: We ask that the Federal Reserve adopt safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. LLS is grateful for the opportunity to provide feedback on this proposal and we urge the Fed to make the changes outline above to ensure that nonprofits like LLS can continue to carry out our life saving mission. If you have any questions about the comments we have provided, please contact Katie Berge at Katie.Berge@lls.org. Sincerely, Brian Connell Executive Director Office of Public Policy

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Coronavirus (COVID-19)	PIO (Email from Web)	6/22/2020 12:00:00 AM	Evans	Connie	jp2@prismgroup.global	Association for Enterprise Opportunity	Monday, June 22, 2020 Re: Proposed Main Street Lending Program Nonprofit Loan Options Dear Sir or Madam: The Association for Enterprise Opportunity (AEO) appreciates the opportunity to respond to the Federal Reserve Bank of Boston's (Federal Reserve) request for public feedback on the proposal to expand the Main Street Lending Program (MSLP) to accommodate nonprofit organizations that were impacted by the economic downturn caused by the Coronavirus pandemic. AEO is the leading voice of innovation in microfinance and microbusiness in the United States. Our more than 1,700 members and partners include a broad range of organizations that provide capital and services to assist underserved entrepreneurs in starting, stabilizing, and expanding their businesses. Last week, the Federal Reserve announced the start of operations on the Main Street Lending Program, a measure created by the Coronavirus Aid, Relief, and Economic Security (CARES) Act to further support small and medium-sized businesses disrupted by the onset of the national health crisis. As of now, the program will deploy liquidity to eligible participants through three (3) facilities: the Main Street New Loan Facility (MSNLF), the Main Street Priority Loan Facility (MSPLF), and the Main Street Expanded Loan Facility (MSELF). In an effort to expand the reach of the program's current infrastructure, the Federal Bank has proposed the inclusion of nonprofit organizations. The Federal Reserve, in collaboration with the Department of Treasury, is pursuing public feedback on the implementation of two new facilities that will provide access to credit for nonprofit organizations. The proposed expansion would offer liquidity to small and medium-sized nonprofits through the Nonprofit Organization New Loan Facility (NONLF) and the Nonprofit Organization Expanded Loan Facility (NOELF). Under the proposed rules, eligible nonprofit lenders will have the aptitude to deploy millions in additional federal assistance to help businesses continue on the road to financial recovery. As noted by the Federal Reserve Chair, Jerome H. Powell, "Nonprofit organizations play a critical role in the national economy and local communities by providing essential services, employing millions of Americans, and supporting the innovation and development of skilled a workforce." We believe that the country's network of nonprofits can help mitigate the financial damage done to small businesses in recent months. To that end, we are weighing in on the Federal Reserve's proposal to expand the MSLP. As it stands, we support the proposal as it is slated to safeguard Mainstreet firms and help slow the national unemployment rate. With the minimum loan size proposed at $250,000 and the maximum loan size of $300 million, nonprofit loan borrowers would be better positioned to achieve financial resilience following the devastating first and second quarter of this year. Notwithstanding AEO's broad support of the proposal, we urge the Federal Reserve Bank to modify its plan to expand the MSLP to include nonprofit entities beyond 501(c)(3) or 501(c)(19) organizations. The Federal Reserve should consider expanding the proposal to 501(c)(4), 501(c)(6), and 501(c)(7), among others. This action would dilate necessary support for additional small and medium-sized nonprofit firms in the weeks and months ahead. Thank you for the opportunity to submit comments on this topic and for your willingness to listen to our feedback on the matter. Sincerely, Connie Evans President & CEO Association for Enterprise Opportunity

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Zeltser	Steve	zeltsers@lfchild.org	Little Flower Children and Family Services of New York	Dear Chairman Powell, Little Flower Children and Family Services of New York is a not-for-profit charity serving children, families, and individuals with developmental disabilities across New York City and Long Island. Since 1929, Little Flower has been committed to improving the lives and well-being of the children, families, and people with developmental disabilities so they can reach their full potential. Our staff of over 600 people builds well-being by providing foster boarding home care, residential treatment care, adoption services, programs and services for individuals with developmental disabilities, and medical and mental health services. Little Flower serves over 300 residents with developmental disabilities across 11 residences in Queens, Nassau, and Suffolk Counties and ensure the needs of over 400 children in foster care are addressed. In 2019, we helped 238 children return to their own families, 45 children find their forever families through adoption, and cared for 143 youth in the Inner Lights Program. Nonprofits are a vital part of New York City's economy. Their continued operations are a lifeline to the City's response to and recovery from the COVID-19 crisis. According to the Bureau of Labor Statistics, New York City's nonprofits employ 16% of the private workforce, 6% higher than the national average. The 45,000 nonprofits in New York City alone employ close to 700,000 people paying $42 billion in wages. Specifically, the human services nonprofit sector which Little Flower is a part of, consists of a workforce of more than 200,000 that have been on the frontlines of the Coronavirus response. Nationally, nonprofits contribute $900 billion to GDP and employ 12 million workers. Simply put, nonprofits are a part of the infrastructure and vitality of our city, state, and nation. Though Little Flower and other human services nonprofits are starting to see the disproportionate effect the COVID-19 crisis is having on all vulnerable individuals, the full economic realities of the COVID-19 era have yet to be felt in earnest. Nonprofit organizations are our country's only institutions solely focused on making communities stronger. In the toughest times, we do the toughest work. When it is time to restore and repair our wellbeing, these community-based institutions need to be equipped to do that as well and their unique needs should not be overlooked. Unfortunately, many nonprofits were entirely shut out from the CARES Act, being deemed ineligible for relief funds - loans or grants - because of the size of the organization. Many New York human services organizations have merged or consolidated into organizations with well over 500 staff members due to years of underfunding from local governments. We were hopeful that the Federal Reserve would amend the Main Street Lending Program to allow true community-based nonprofits of all sizes to qualify for funding. The needs of (human services) nonprofits differ greatly than that of for-profit employers or nonprofits like hospitals. Little Flower appreciates the opportunity to submit comment to the Federal Reserve about the Nonprofit Organization Loan Facilities. This proposal is aimed more at transactional nonprofits such as hospitals and institutions of higher education than at nonprofits like Little Flower. Indeed, many nonprofits pride themselves on offering their services at no charge. Recognizing that their business models are different, even if both types of charities are inherently organized around a public mission, many of the financial requirements included in this proposal simply are not applicable to organizations that rely on donations. With that in mind, Little Flower respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below. 1. Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress and the Federal Reserve must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation recovers - providing childcare, job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation(s): ? Congress and the Federal Reserve must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 emergency relief legislation 2. The Federal Reserve Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. It is important to note that the vast majority of social service nonprofit funding comes from government grants contracts, recognizing the key role such organizations play in serving the most vulnerable. Numerous studies confirm that government funding seldom covers the full cost of providing contracted work, which inhibits nonprofits from accumulating reserves through surpluses. In many instances, government grant/contract work creates cash-flow challenges since it is paid after the work has been completed and can be subject to significant delays in payment. Recommendation(s): ? Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and bringing the loan origination ratio of 40-50% (down from 65% as proposed). ? We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be off-putting for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. ? We urge that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the 5-year amortization were extended to 7 years, this could lessen the balloon payment. We request that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 3. The Ratio of Adjusted 2019 Earnings before "EBIDA" Should Be Revised In the "Draft for Public Consultation," for both the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility, one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%." (#6) In the context of nonprofit operations, this threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria alone, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also so as to not leave excess surpluses that could be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic plan-a negative ratio at one isolated point is not always an indication of instability.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Furthermore, the footnotes for criteria #6 clarify that "The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude contributions raised for a "capital campaign," excluding other capital funds included in an annual budget for maintenance and planned upgrades would further decrease the required ratio. Recommendation(s): ? The 5% requirement should be reduced to zero, if not eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility for a nonprofit borrower. Finally, further clarification on the calculation methodology -in the context of nonprofit operating budgets- is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. 4. "Reasonable Efforts" Regarding Employee Retention Require Further Clarification The description of "Retaining Employees" in the draft term sheet requires refinement if the Federal Reserve expects nonprofits to take advantage of this facility. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation(s): ? "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in with the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. One option would be to add the qualifier "mission-based" before "reasonable efforts." ? The terms "maintain its payroll" and "retain its employees" are vague and need further refinement. We ask the Federal Reserve to make clear that nonprofits participating in the Main Street loan program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. ? We ask that the Federal Reserve adopt safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. Finally, though Little Flower receives a majority of its funding from New York State government grants contracts, we are asking the Federal Reserve to eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations, and instead make 501(c)(3) organizations that otherwise meet the employee size are eligible. Many nonprofits have been on the frontlines during the pandemic providing the essentials to those who needed it the most. They raise money and receive donations to continue their mission. We've all seen the long lines at food banks across our nation over the last three months. Please do not hesitate to contact me should you have any questions. Thank you, Steve Zeltser External Relations Manager Little Flower Children and Family Services of New York

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program -	PIO (Letter)	6/22/2020 12:00:00 AM	McKinley	Michele.McKinley@YMCATriangle.org	Michele.McKinley@YMCATriangle.org	North Carolina Alliance of the YMCA	June 19, 2020 Federal Reserve Board of Governors Constitution Ave NW &, 20th St NW Washington, DC 20551 Emailed to: regs.comments@federalreserve.gov. Subject: Main Street Lending Program - NONLF and NOELF RE: Comments on the "Draft for Public Consultation" the Mainstreet Lending Program for Nonprofits To Whom It May Concern: The North Carolina Alliance of YMCAs respectfully submits these comments in response to Federal Reserve Board's announcement on June 15, 2020 that it is seeking public feedback on the proposal to expand its Main Street Lending Program for nonprofit organizations. We appreciate the Federal Reserve Board making this program available to nonprofits; however, there are several concerns outlined below that could help improve the program and make it truly applicable and accessible to nonprofit organizations, such as local YMCAs. North Carolina's 25 local 501(c)3, charitable, nonprofit YMCAs serve communities throughout the state. Each of these YMCAs helps strengthen their local communities through youth development, healthy living, and social responsibility. In 2019, our Ys engaged nearly 1 million adults, children and seniors-regardless of age, income, or background-to nurture the potential of children and teens, improve the health and well-being, limit social isolation and provide opportunities to give back and support neighbors. The Y works side-by-side with its neighbors to make sure everyone has the opportunity to learn, grow, and thrive. Despite mandated facility closures, cancellation of traditional programming and a decrease in giving due to COVID-19, the Y has stepped up to address the critical need for safe childcare options and other needed services across the state. From mid-March to the end of May, NC Ys provided emergency child care for 1,900 children at 48 locations for families of medical personnel, essential employees and first responders. With school closures, children cannot access USDA breakfasts and lunch and during this time of economic uncertainty, a rapidly increasing number of adults and families are facing food insecurity. In response, our Ys collectively served or delivered 266,000 meals to children and families during this same time period. NC Alliance of YMCAs 801 Corporate Center Dr., Suite 200 Raleigh, NC 27607 www.ncymcaalliance.org

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Gregory	Sashi	sgregory@wphca.org	Wisconsin Primary Health Care Association	We are writing on behalf of the Wisconsin Primary Health Care Association, the member association for the 17 Federally Qualified Health Centers (FQHCS or "Health Centers") in Wisconsin. FQHCs are a community-based, non-profit organizations whose goal is to provide affordable, accessible health care for all individuals, regardless of their ability to pay. As explained below, we appreciate the Federal Reserve's intention to expand Main Street Loans to non-profit organizations; however, after analyzing the draft Term Sheet, we have determined that very few FQHCs would qualify for these loans under the current eligibility requirements. Therefore, we are requesting that: - the loan terms be revised to enable the majority of FQHCs to qualify, and - FQHCs be permitted to work with Community Development Financial Institutions (CDFIs) to access Main Street loans, as CDFIs understand the unique FQHC model and collectively have provided more than $2.1 billion in loans to FQHCs, with a default rate of less than 1/10th of 1%. Background on Wisconsin Community Health Centers and the COVID-19 Pandemic Community Health Centers in Wisconsin are community-based, non-profit organizations committed to providing medical, dental and behavioral health care in communities across the state. They serve over 300,000 patients with the majority living in families with incomes below 200% of the Federal Poverty Level. Many of these patients live in communities that have been particularly hard it by the COVID-19 pandemic, at both the physical and economic levels. Health Centers have been at the frontlines of the response to the epidemic, and they have stepped up and responded to the needs of the communities they serve. They have shifted their services to implement the expansion of telehealth visits, COVID-19 testing, and outreach and special services to some of the hardest hit populations in the State. At the same time, Health Centers have experienced significant declines in revenues due to the need to cut back on primary care, preventive and dental visits. This combination has placed major financial strain on these non-profit, community-based providers, forcing them to close sites and lay off staff at the time when their services are most needed. While FQHCs have received some Federal funding to support COVID relief, for many FQHCs this funding is not enough to reestablish their pre-COVID level of operations, let alone prepare for the increased demand that will result as newly-unemployed and uninsured individuals turn to them for care. WPHCA engaged BKD, a national leader in financial accounting, to do a scenario planning analysis for Wisconsin Community Health Centers. The analysis indicated that revenue loss for Wisconsin Health Centers over a one-year period could range from $85 million at best to $205 million dollars at worst. Recommendation to expand eligibility criteria to allow majority of FQHCs to qualify: Because of these financial needs, the Wisconsin Primary Health Care Association was relieved to learn that the Federal Reserve would soon start offering Main Street Loans to non-profits. However, after reviewing the proposed Terms Sheet and consulting with experts, we have concluded that very few FQHCs would qualify under the proposed eligibility criteria. This conclusion is based on an analysis conducted by Capital Link, a non-profit organization that receives funding from the Federal Department of Health and Human Services to assist FQHCs with accessing capital. Capital Link determined that under the proposed lending parameters: - Prior to the pandemic, only 13% of Health Centers (6% of WI Health Centers) would have met the combined criteria. - Because of the significant cash declines experienced by FQHCs as a result of COVID-19, at present, far fewer than 13% would be able to meet the Days Cash on Hand (DCOH) and Cash/Debt ratio at loan origination. The most problematic financial parameters for FQHCs are: - Earnings Before Interest, Depreciation, and Amortization (EBIDA) to unrestricted 2019 operating revenue greater than or equal to 5% - Days cash on hand at loan origination equal to or greater than 90 days (38% of WI CHCs qualify) - Ratio of unrestricted cash and investments to outstanding debt (including Main Street debt and CMS Accelerated and Advance Payments) at origination is 65% or greater Only one WI CHC meets these criteria and the minimum employee requirement and only 31% meet three of the four criteria. In order to provide a meaningful program for which approximately 60% of FQHCs nationwide would qualify, we request that the Federal Reserve adjust the following lending parameters for FQHCs loans as follows: - Earnings Before Interest, Depreciation, and Amortization (EBIDA) to unrestricted 2019 operating revenue greater than or equal to 3% - Days cash on hand at loan origination equal to or greater than 30 days

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							- Eliminate the unrestricted cash to debt ratio requirement - Lower the minimum employee requirement to 20. In addition, we ask that the Federal Reserve clarify the eligibility requirement that reads: "has not received specific support pursuant to the Coronavirus Economic Stabilization Act of 2020 (Subtitle A of Title IV of the CARES Act)." As you know, Section 4003 of Title IV authorizes the Federal government to make loans to States and municipalities for COVID-19 relief. It is possible that a state or municipality could receive a loan under Section 4003, and use part of it to support FQHCs or other safety net providers. To make clear that FQHCs or other providers who receive this type of support from their state are still eligible for Main Street Loans, we recommend that the term "specific support" be revised to read "direct support." Request for FQHCs to work directly with CDFIs to access Main Street Loans Finally, it is important to note that Community Development Financial Institutions (CDFIs) have historically played a major role in providing financing to FQHCs for decades. As such, they understand the FQHC model and are best positioned to underwrite loans to health centers. A coalition of 25 CDFIs who are members of the Lenders Coalition for Community Health Centers have collectively provided more than $2.1 billion in loans to FQHCs, with a default rate of less than 1/10th of 1%. Unfortunately, very few CDFIs would qualify as eligible lenders under the program as it is currently construed. To enable FQHCs to work directly with lenders who best understand their model and needs, we recommend that the Federal Reserve structure the nonprofit portion of the Main Street Loan Program to: - Allow CDFIs to participate as lenders in the program; and - Allow CDFIs to borrow from the Federal Reserve under the same terms as banks, which would enable CDFIs to offer interest rates to FQHCs at LIBOR +3% We are providing these comments on short notice to accommodate the Federal Reserve's request. We would be happy to provide more detailed comments and/or provide additional information to assist the Federal Reserve in developing a program that will be responsive to the current needs of Federally Qualified Health Centers in Wisconsin.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Dalton	Michael	mdalton@metrohealth.org	The MetroHealth System	June 22, 2020 Board of Governors of the Federal Reserve System regs.comments@federalreserve.gov RE: Main Street Lending Program - NONLF and NOELF To the Board of Governors: On behalf of The MetroHealth System, I am submitting these comments in response to the Federal Reserve Bank's June 15th proposal to expand its Main Street Lending Program to provide access to credit for nonprofit organizations. The MetroHealth System is a large, public safety net health system located in Cuyahoga County, Ohio, which includes the City of Cleveland and its surrounding suburbs. MetroHealth is committed to improving the health of the community and reducing health disparities and health inequities. Our staff of 8,000 provides care at MetroHealth's four hospitals, four emergency departments, and more than 20 health centers and 40 additional sites throughout Cuyahoga County. The health system is also home to Cuyahoga County's most experienced Level I Adult Trauma Center, verified since 1992, and Ohio's only adult and pediatric trauma and burn center. Last year, MetroHealth served 300,000 patients at more than 1.4 million visits in its hospitals and health centers, 75 percent of whom are uninsured or covered by Medicare or Medicaid. The community served by MetroHealth experiences several health disparities including: health outcomes related to chronic conditions like diabetes, heart disease, and asthma; barriers to accessing care, especially transportation, broadband Internet access, and health insurance; social determinants of health like poverty, unemployment, and housing instability; and the pressing issues of opioids, care for older adults, and community trauma. It's in the spirit of our mission and who we serve that we appreciate and applaud the Federal Reserve for creating the Non-Profit Expanded Loan Facility pursuant to Section 13(3) of the Federal Reserve Act as there are so many other organizations who can benefit from access to additional financial resources during these unprecedented times. However, we are concerned by the possibility that participation in this lending opportunity may be limited strictly to organizations described in Sections 501(c)(3) and (19) of the Internal Revenue Code. MetroHealth, like many public hospitals and health systems who need the type of relief envisioned by the Main Street program, is not technically a 501(c)(3) organization. In every other respect, apart from our tax classification, we resemble our nonprofit hospital brethren and provide care to some of the most vulnerable populations who have been particularly hard-hit by the COVID-19 pandemic. We request that the scope of the facility be expanded, pursuant to the discretion mentioned under the second footnote, to include public hospitals. Moreover, we would encourage greater flexibility in the requirements for eligible borrowers. We recommend that organizations be required to meet one of the following in order to qualify: EBIDA greater than or equal to 4%; 60 days cash on hand; a debt service coverage ratio of 2.0, or a cash to debt percent. With respect to the calculation of EBIDA, there should be flexibility to include many of the add-backs commonly accepted in market credit agreements in addition to interest, depreciation and amortization. Additionally, the cash to debt percentage should be lowered from the proposed 65% to 40%. Finally, with respect to the proposed $35 million maximum amount, we would recommend changing this to equal one month of the organization's 2019 revenues. We appreciate your consideration of these requests. Sincerely, Craig Richmond Executive Vice President & Chief Financial Officer

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF and NOELF	PIO (E-mail)	6/22/2020 12:00:00 AM	Spreitzer	Sarah	saspreitzer@acenet.edu		Jerome Powell, Chairman Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington, DC 20551 June 22, 2020 Re: Main Street Lending Program-Nonprofit Organization Facilities Dear Chairman Powell, On behalf of the American Council on Education (ACE) and the undersigned higher education associations, we submit the following comments in regard to the Main Street Lending program (MSLP) non-profit organization facilities and the proposed terms and structure. For our nation's colleges and universities, access to affordable capital is a necessary lifeline as they navigate the economic fallout from the COVID-19 crisis. The financial impact of the novel coronavirus on institutions is extreme and the costs continue to mount. Institutions incurred additional costs to move instruction online early in the pandemic, are losing substantial auxiliary revenues, and face a range of further challenges that are unique to each campus. At the same time, many institutions of higher education provided significant refunds of expenses such as on-campus housing and meal plans. Academic medical centers and their associated faculty physician practices on the front lines of treating COVID-19 patients have lost significant revenue by halting elective procedures and non-urgent patient care visits during the pandemic. Lost summer revenue and looming losses in the fall, such as deep cuts in state funding for public institutions of higher education, as well as potential enrollment declines across higher education, compound their challenges. Moreover, as institutions make plans toward how to proceed in the fall, they will undoubtedly face additional costs to ensure a safe learning environment which will include, among other things, sufficient PPE for students and staff, campus COVID-19 cleaning, testing and tracking tools, and efforts to de-densify campus housing and learning facilities. America's colleges and universities have a major direct (and indirect) impact on their local, state, and regional economies. Universities are often one of the, if not the, largest employers for an area. The research activities at colleges and universities in diverse fields such as biotechnology, energy, and aerospace create jobs and businesses at a national level. Individual students, staff, and faculty also have a direct impact on local and regional economies via spending on housing, shopping, food services, construction, and local small businesses. This outsized economic impact is seen across all sectors of higher education.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF and NOELF	PIO (E-mail)	6/22/2020 12:00:00 AM	Noonan	Heather	hnoonan@americanorchestras.org	League of American Orchestras	League of American Orchestras Advancing the Orchestral Experience for All June 22, 2020 To: The Federal Reserve Re: Main Street Lending Program - NONLF and NOELF via regs .comments@federalreserve.gov On behalf of the League of American Orchestras, we thank the Federal Reserve for this opportunity to comment on the Main Street Lending Nonprofit Organization Expanded Loan Facility and the Nonprofit Organization New Loan Facility, announced on June 15, 2020. The League of American Orchestras is the not-for-profit service organization for the field of symphony orchestras. Founded in 1942 and chartered by Congress in 1962, the League represents a diverse membership of orchestras across North America and it links a national network of thousands of instrumentalists, conductors, managers and administrators, board members, volunteers, and business partners. There are more than 1,600 nonprofit orchestras in all 50 states, serving virtually every community, most with annual budgets of under $300,000. As members of the 501(c)(3) charitable sector, orchestras depend upon private philanthropy and civic support to fuel programs that serve community needs. The service orchestras provide in communities nationwide is supported by a critical combination of earned revenue and private support. The coronavirus pandemic is having very real financial consequences for orchestras, musicians, and the communities they serve. Following concert and program cancellations, the loss of earned revenue has been immediate and sustained. As large performing ensembles, orchestras engage a workforce of many musicians, typically performing in close proximity to one another. Given the duration of recommendations to sustain physical distancing, the ability to generate earned revenue will be extremely diminished for a long period of time, as orchestras pivot to find new ways to deliver on their mission. As part of the nonprofit charitable sector, orchestras have depended upon private philanthropy for more than 40 percent of the revenue and civic support to fuel programs that serve community needs prior to the coronavirus pandemic. While they have suffered lost contributed revenue as donors reassess their capacity to give due to economic uncertainty, orchestras will rely on private giving as an increasing percentage of overall revenue in the wake of COVID-19 concert and programmatic closures. We request immediate revisions to the Main Street Lending facilities to support orchestras and other nonprofit organizations in urgent need of resources to support their workforce and services to the public. We join others in the broader nonprofit sector in raising the following points: Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. As orchestras near the end of the duration of relief provided under the Paycheck Protection Program (PPP), further assistance is urgently needed. Additionally, orchestras that exceeded the 500-employee PPP qualifying threshold have been left out of opportunities for federal relief. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness in the next round of COVID-19 relief legislation

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							The Federal Reserve's Proposal to Limit Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Charitable Sector The Federal Reserve's criteria that organizations must have revenues from donations that are less than 30% will disqualify many charities, including most nonprofit orchestras. Prior to the onset of COVID-19, orchestras have, on average, relied on private contributions for 43% of revenue. While comprehensive data is not yet available, it is certain that orchestras' reliance on private contributions will only grow as sources of earned revenue are greatly diminished in the wake of cancelled concerts and programmatic activity. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations. Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. The list of borrower requirements includes #7: "has a ratio (expressed as a number of days) of (i) liquid assets at the time of loan origination to (ii) average daily expenses over the previous year, equal to or greater than 90 days." The list of borrower requirements also includes #8: "at the time of loan origination, has a ratio of (i) unrestricted cash and investments to (ii) existing outstanding and undrawn available debt, plus the amount of any loan under the Facility, plus the amount of any CMS Accelerated and Advance Payments, that is greater than 65%." Like most others in the nonprofit sector, these requirements are not achievable for most orchestras. According to data collected by the League of American Orchestras prior to the COVID-19 pandemic, less than one-third of orchestras reporting balance sheet data had three months or more of liquidity available, and that portion has likely narrowed following the onset of COVID-19-related declines in revenue. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to serve communities during and beyond the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations. We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for PPP Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). The notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be prohibitive for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: We urge that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the 5-year amortization were extended to 7 years, this could lessen the balloon payment. We request that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. The Ratio of Adjusted 2019 Earnings before "EBIDA" Should Be Revised In the "Draft for Public Consultation," for both the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility, one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%." In the context of nonprofit operations, this threshold is too high and would make many, if not most,

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							nonprofits ineligible based on these criteria alone, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, out of necessity and also so as not to leave excess surpluses that could instead be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic approach; therefore a negative ratio at one isolated point is not always an indication of instability. Recommendation: The 5% requirement should be reduced to zero, if not eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility for a nonprofit borrower. Finally, further clarification on the calculation methodology-in the context of nonprofit operating budgets- is needed in regard to restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. Limitation of SO-Employee Minimum Should Be Removed The term sheet for the proposed nonprofit loan facility imposes a size minimum that is not imposed in the Main Street New, Priority, or Expanded Loan Facilities for for-profit businesses. There is no explanation why the Federal Reserve is proposing that nonprofits with fewer than 50 employees should not be eligible for Main Street loans for which their small business counterparts of equal size could secure lending support. For orchestras that engage a workforce in a combination of employee and independent contractor status, this limitation could make many organizations ineligible. Recommendation: The 50-employee floor should be removed. As a vibrant part of the charitable sector, our nation's more than 1,600 nonprofit orchestras rely on philanthropy and event-dependent income to fuel programs that serve community needs and support a dynamic workforce. We urge consideration of loan eligibility and forgivability as the Federal Reserve takes further action. Orchestras and the broader nonprofit sector are critical partners in jumpstarting local, state, and national recovery efforts during and after COVID-19 and should be supported by all forms of relief. Jesse Rosen President & CEO

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Fleury	Danielle	dfleury@massnonprofitnet.org	Massachusetts Nonprofit Network	The Massachusetts Nonprofit Network (MNN) appreciates the opportunity to submit comments to the Federal Reserve about the Nonprofit Organization Loan Facilities. On behalf of nonprofits in Massachusetts, MNN respectfully requests the Federal Reserve to address the concerns and consider the proposed changes outlined below. 1. 50-Employee Minimum The term sheet for the proposed nonprofit loan facility imposes a size minimum that is not imposed in the Main Street New, Priority, or Expanded Loan Facilities for for-profit businesses. Nonprofits with fewer than 50 employees should be eligible for Main Street loans alongside their small business counterparts of equal size. Many of the nonprofits in our network are on the frontlines of this pandemic, working with fewer than 50 employees to address immediate and growing needs. These vital organizations would be arbitrarily excluded from important loan program. The "typical" nonprofit is community-based, serving local needs. Excluding these vital organizations from important loan programs would not only cut out the vast majority of nonprofits, but also harm the people who would no longer be served by those nonprofits. Recommendation: The Nonprofit Organization Loan programs must be revised to remove the 50- employee floor. 2. The 30% Cap on Revenue from Donations The Federal Reserve's criteria that organizations must have revenues from donations that are less than 30% will disqualify many charities. Nonprofits raise money and receive donations from the public, foundations, corporations, and others to fund their work. In order to retain tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, charitable nonprofits must meet a "public support" test showing they receive at least a third of their revenues via contributions from the general public, contributions or grants from other public charities, or from governmental agencies. The informational tax return that most charitable nonprofits fill out each year - the Form 990 - requires nonprofits to list different forms of revenue. The IRS treats certain work performed by nonprofits under written agreements with governments as donations. Specifically, Form 990, Part VIII Statement of Revenue provides the line item "e. Government grants (contracts)" as the place where some organizations - notably human service providers - disclose as much as 90 percent of their revenues as contributions, even though they are earned via written agreements with governments to provide specific services to the public (see generally IRS Instructions for Schedule A (Form 990 or 990-EZ) - Public Charity Status and Public Support). Nonprofits are unique in having a wide mix of revenue streams that depend on their field and the communities they serve; any reliance on an arbitrary threshold for charitable donations would exclude charitable organizations that will survive with sufficient federal support, and help their communities and economies recover from this pandemic. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations. 3. The Proposed Loan Terms The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. It is important to note that the vast majority of social service nonprofit funding comes from government grants contracts, recognizing the key role such organizations play in serving the most vulnerable. Numerous studies confirm that government funding seldom covers the full cost of providing contracted work, which inhibits nonprofits from accumulating reserves through surpluses. In many instances, government grant/contract work creates cash-flow challenges since it is paid after the work has been completed and can be subject to significant delays in payment. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and bringing the loan origination ratio of 40-50% (down from 65% as proposed).

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be off-putting for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: We urge that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the 5-year amortization were extended to 7 years, this could lessen the balloon payment. We request that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 4. The Ratio of Adjusted 2019 Earnings before "EBIDA" In the "Draft for Public Consultation," for both the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility, one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%" (#6). In the context of nonprofit operations, this threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also so as to not leave excess surpluses that could be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic plan-a negative ratio at one isolated point is not always an indication of instability. Furthermore, the footnotes for criteria #6 clarify that "The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude contributions raised for a "capital campaign," excluding other capital funds included in an annual budget for maintenance and planned upgrades would further decrease the required ratio. Recommendation: The 5% requirement should be reduced to zero, if not eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility for a nonprofit borrower. Finally, further clarification on the calculation methodology -in the context of nonprofit operating budgets- is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. 5. Employee Retention The description of "Retaining Employees" in the draft term sheet requires refinement in order for nonprofits to access this program. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation: "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in with the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. One option would be to add the qualifier "mission-based" before "reasonable efforts." Recommendation: The terms "maintain its payroll" and "retain its employees" are vague and need further refinement. We ask the Federal Reserve to make clear that nonprofits participating in the Main Street loan program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. Recommendation: We ask that the Federal Reserve adopt safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. 6. Additional Recommendations and Requests for Clarification MNN respectfully requests the Federal Reserve clarify the following issues in its final expansion notice. Endowment: What resources should be included in endowment calculations? Does it include restricted endowments? Does it extend to include cash on hand? Collateral: Flexibility on collateral is requested. The loan should be able to be approved with no more than 50% Loan to Value (LTV) if collateral is needed. Other Debts: The proposal requires that borrowers, "refrain from repaying the principal balance of, or paying any interest on, any debt until the Eligible Loan is repaid in full, unless the debt or interest payment is mandatory and due." We request that this exclude lines of credit and other debt that are assumed to provide financial liquidity related to the impact of COVID-19. 7. Loan Forgiveness Finally, Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even as they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the front lines - caring for the sick, feeding families, and keeping our communities connected. Furthermore, nonprofits will play an integral role as our nation recovers - providing childcare, job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations in the face of enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard, and also need access to additional lending support. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 relief legislation. Thank you for your consideration of this input on behalf of Massachusetts nonprofit organizations. If any additional information is helpful, please contact MNN's Director of Government Affairs, Danielle Fleury, at 617-391-9175 or dfleury@massnonprofitnet.org.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Sanik	Lorraine	lsanik@thomchild.org	Thom Charels River Early Intervention	I have worked for 18 years leading a program within a non-profit agency which has a 100 year history of helping families in Massachusetts. Yearly pre-Covid 19, we provide home visiting services to more than 45 babies and toddlers and out larger Agency services over 15,000 infants and toddlers. This skilled staff of 864 professionals made this possible. And yet, because there are more than 500 of us, we were left without support for sick leave, paycheck protection, and forgivable loans. We are held to different criteria for the employee retention credit. We are left out of the economic stimulus that is essential for our organization's survival. The lack of cash flow to our agency and others like ours has led to job loss and has delayed job creation. The longer term impact is that communities, families, and our service sector will suffer for decades. Across the country, programs like ours are closing, furloughing staff, and stopping services to children who need our help. These programs like ours serve children who are deaf, premature, visually impaired, medially compromised, language or motor delayed. Some children are homeless or live with parents unable to provide a basic level of parenting skills. With access to favorable lending terms and with the same stimulus funding that was offered to smaller non-profits, we could start calling back to work our furloughed staff. We could continue to support children and families. We could avoid an erosion of our social service sector. Necessarily, however, the eligibility criteria ratio of, "adjusted 2019 EBIDA to unrestricted 2019 operating revenue, greater than or equal to 5%", excludes nearly every social service nonprofit known to us. This criteria is burdensome, unnecessary, and rewards nonprofit agencies that have chosen to retain a high earnings margin. To support nonprofits and economic recovery, this criteria must be removed. Thank you for your consideration.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Sabella	Terri	terri.sabella@tnpca.org	Tennessee Primary Care Association	We are writing on behalf of the Tennessee Primary Care Association (TPCA). TPCA is the membership association for Federally Qualified Health Centers (FQHCs), or community health centers (CHCs) in Tennessee. FQHCs are community-based, non-profit organizations that provide affordable, accessible health care to all individuals, regardless of their insurance status or ability to pay. As explained below, we appreciate the Federal Reserve's intention to expand Main Street Loans to non-profit organizations; however, after analyzing the draft Term Sheet, we have determined that almost no FQHCs would qualify for these loans under the current eligibility requirements. Therefore, we are requesting that: the loan terms be revised to enable the majority of FQHCs to qualify, and FQHCs be permitted to work with Community Development Financial Institutions (CDFIs) to access Main Street loans, as CDFIs understand the unique FQHC model and collectively have provided more than $2.1 billion in loans to FQHCs, with a default rate of less than 1/10th of 1%. Background on TPCA and the COVID-19 Pandemic FQHCs in Tennessee centers deliver care at over 200 sites across the state and serve more than 422,000 patients each year. Health centers serve on the front lines of public health including the ongoing COVID-19 pandemic. In Tennessee, 73% of community health center patients have incomes below the Federal Poverty Level and one-third of community health center patients are uninsured, a number that is expected to jump as Tennessee experiences record unemployment and more individuals lose their health insurance. Community health center patients are especially susceptible to COVID-19 because many of them live with multiple chronic conditions or with housing insecurity that makes social distancing challenging. FQHCs in Tennessee responded to the COVID-19 pandemic by quickly adjusting their daily operations to expand telehealth capabilities and open testing sites in their communities. Community health centers continue to ramp up COVID-19 testing and collaborate with local and state partners to reach vulnerable and underserved communities. Even as community health centers respond to COVID-19, they have faced dramatic reductions in revenue as preventive and primary care visits plummeted. Tennessee's community health centers anticipate losing up to $89.9 million in operating income depending on how long the pandemic lasts. The combined financial strain of pandemic response and reductions in delivery of routine health services has forced FQHCs to limit their hours, furlough or lay-off staff, and close certain sites. FQHCs have received federal funding to address some of their immediate COVID-19 related needs, but have not received the investment they need to survive the pandemic and resume pre-COVID-19 operations. Community health centers are also bracing for an influx of patients as the unemployment rate increases and more individuals lose health insurance. FQHCs have only received up to 2% of their net patient revenues from the Provider Relief Fund. While many health centers have also applied for funding through the Paycheck Protection Program, this option is only available to those community health centers with less than 500 employees. Recommendation to expand eligibility criteria to allow majority of FQHCs to qualify: TPCA was relieved to learn that the Federal Reserve would soon start offering Main Street Loans to non-profits. However, after reviewing the proposed Terms Sheet and consulting with experts, we have concluded that almost no FQHCs would qualify under the proposed eligibility criteria. This conclusion is based on an analysis conducted by Capital Link, a non-profit organization that receives funding from the Federal Department of Health and Human Services to assist FQHCs with accessing capital. Capital Link determined that under the proposed lending parameters: Prior to the pandemic, only 13% of health centers would have met the combined criteria. This includes less than one in five of the FQHCs with over 500 staff, who are currently ineligible for the Paycheck Protection Program. Because of the significant cash declines experienced by FQHCs as a result of COVID-19, at present, far fewer than 13% would be able to meet the DCOH and Cash/Debt ratio at loan origination. The most problematic financial parameters for FQHCs are: EBIDA to unrestricted 2019 operating revenue greater than or equal to 5% Days cash on hand at loan origination equal to or greater than 90 days Ratio of unrestricted cash and investments to outstanding debt (including Main Street debt and CMS Accelerated and Advance Payments) at origination is 65% or greater In order to provide a meaningful program for which approximately 60% of FQHCs would qualify, we request that the Federal Reserve adjust the following lending parameters for FQHCs loans as follows:

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							EBIDA to unrestricted 2019 operating revenue greater than or equal to 3% Days cash on hand at loan origination equal to or greater than 30 days Eliminate the unrestricted cash to debt ratio requirement Lower the minimum employee requirement to 20. In addition, we ask that the Federal Reserve clarify the eligibility requirement that reads: "has not received specific support pursuant to the Coronavirus Economic Stabilization Act of 2020 (Subtitle A of Title IV of the CARES Act)." As you know, Section 4003 of Title IV authorizes the Federal government to make loans to States and municipalities for COVID-19 relief. It is possible that a state or municipality could receive a loan under Section 4003, and use part of it to support FQHCs or other safety net providers. To make clear that FQHCs or other providers who receive this type of support from their state are still eligible for Main Street Loans, we recommend that the term "specific support" be revised to read "direct support." Request for FQHCs to work directly with CDFIs to access Main Street Loans Finally, it is important to note that Community Development Financial Institutions (CDFIs) have historically played a major role in providing financing to FQHCs for decades. As such, they understand the FQHC model and are best positioned to underwrite loans to health centers. A coalition of 25 CDFIs who are members of the Lenders Coalition for Community Health Centers have collectively provided more than $2.1 billion in loans to FQHCs, with a default rate of less than 1/10th of 1%. Unfortunately, very few CDFIs would qualify as eligible lenders under the program as it is currently construed. To enable FQHCs to work directly with lenders who best understand their model and needs, we recommend that the Federal Reserve structure the nonprofit portion of the Main Street Loan Program to: Allow CDFIs to participate as lenders in the program; and Allow CDFIs to borrow from the Federal Reserve under the same terms as banks, which would enable CDFIs to offer interest rates to FQHCs at LIBOR +3% We are providing these comments on short notice to accommodate the Federal Reserve's request. We would be happy to provide more detailed comments and/or provide additional information to assist the Federal Reserve in developing a program that will be responsive to the current needs of Federally Qualified Health Centers. Sincerely, Terri Sabella, CEO Tennessee Primary Care Association

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Vest	Christopher	cvest@asaecenter.org	ASAE	June 22, 2020 Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, N.W. Washington, DC 20551 RE: Change Eligibility Requirements for the Main Street Leading Program to Include Section 501(c)(6) Organizations Dear Board of Governors of the Federal Reserve System: On behalf of the American Society of Association Executives (ASAE), which represents more than 48,000 association professionals nationwide, I applaud your recent proposal to expand the Main Street Lending Program to provide small and medium-sized Section 501(c)(3) nonprofit organizations access to loans due to the coronavirus pandemic. As you note in the proposal, nonprofit organizations are a critical part of the economy and provide essential services to society. As you gather feedback to make the program as efficient and effective as possible, ASAE urges you to expand the scope of the program to give Section 501(c)(6) associations the same access to credit during this difficult time. As the largest organization to represent trade and professional associations, part of ASAE's mission is to advocate legislative, regulatory and legal issues that directly or potentially impact the broad association, nonprofit and tax-exempt communities. This includes, travel, tourism and conferences, with which associations and other Section 501(c) organizations play a major role. More than 62,000 associations across the country play an important role to train America's workforce, create industry and professional standards, and disseminate essential information and resources to people in need - particularly during times of crisis. These organizations are already relied upon to help coordinate federal resources to combat the coronavirus pandemic, and they require staff to fulfill this duty. Associations now face, however, unprecedented financial losses from event cancellations. Most associations also anticipate further losses in dues revenues, as members address their own economically precarious circumstances by cutting expenses, including association membership. Without support, Section 501(c)(6) organizations will be unable to continue to provide the services on which so many rely. The Coronavirus Aid, Relief and Economic Security (CARES) Act does not provide sufficient and critically needed emergency funds to trade and professional associations in desperate need of support. For example, Section 501(c)(6) organizations do not have access to the Paycheck Protection Program and statutory language for Economic Injury Disaster Loans (EIDL; Section 1110) is unclear in exactly how it treats associations. Many associations have little or no financial cushion to carry them through these times. One coalition of teaching organizations, which collectively are ASAE members, was forced to cancel its April annual meeting and now faces a loss of $226,000 - without support, this loss will bankrupt the coalition, which has supported education and teaching for 50 years. Another ASAE member, which provides critical assistance for rural healthcare, faces almost $2.5 million in financial loss as a result of major event cancellations. This would be a vast loss for any organization and a crippling one for many ASAE members. We urge you to expand the eligibility requirements for the Main Street Lending Program to include 501(c)(6) organizations. Thank you for your consideration. If you have questions regarding ASAE or its request for critically-needed assistance to the association and nonprofit sectors, please contact Mary Kate Cunningham, CAE, vice president of public policy, at mcunningham@asaecenter.org or 202- 626-2787. Sincerely, Susan Robertson, CAE President and CEO

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Segal	Nancy	nsegal@ets.org	ETS	Jerome Powell, Chairman Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington, DC 20551 June 22, 2020 Re: Main Street Lending Program-Nonprofit Organization Facilities Dear Chairman Powell, I am writing on behalf of Educational Testing Service (ETS) to submit comments in regard to the new lending facility being established as part of the Main Street Lending Program (MSLP) for non-profit organizations. We appreciate the update clarifying that private, nonprofit institutions are eligible businesses that may access the Main Street Lending Program. Like many other nonprofit entities, ETS has been severely impacted by the COVID-19 crisis and access to these types of programs is critical to our continued operations and our workforce. By the way of background, ETS is a nonprofit organization which was established in 1947 that employs approximately 3,200 people, mostly in the U.S., providing world-class educational assessments and related services. ETS is involved in work spanning all levels of the education system. Domestically, we are best known for our K-12, teacher licensure and higher education assessments, as well as for developing and administering the SAT and AP exams for the College Board. ETS also owns the GRE exam which is accepted by most graduate schools and business schools, as well as English language assessments such as TOEFL and TOEIC. In addition, ETS provides critical support to the U.S. Department of Education on the National Assessment of Educational Progress (NAEP) and leads work on PISA and PIAAC assessments for the Organization for Economic Cooperation and Development (OECD). Through our TOEFL and GRE assessments, ETS plays a critical role in bringing tuition-paying international students to U.S. educational institutions. U.S. education service exports ranked fifth among service exports in 2018. International students studying in the U.S. supported over 450,000 jobs and contributed over $45.3 billion to the U.S. economy in tuition and living expenses in 2018, producing a trade surplus of $35.2 billion. These export numbers are very important for supporting the health of the U.S. economy. As you seek to finalize the terms and structure of this program, we offer the following comments to help ensure there is clarity for nonprofits like ETS: As a preliminary matter, the draft loan summary included in the request for comments mentions that not all of the applicable terms and conditions are listed. This lack of transparency can lead to confusion for the nonprofit borrower. For example, the section titled 'Required Borrower Certifications and Covenants' of the document titled Nonprofit Organization Expanded Loan Facility (DRAFT), states "In addition to other certifications required by applicable statutes and regulations, the following certifications and covenants will be required from Eligible Borrowers." It would be helpful to know all the loan terms and conditions and certifications that a borrower must meet in order to qualify for these nonprofit loans. In addition, we would recommend greater clarity with respect to the following: Specific requirements for a borrower who has access to other credit facilities; Whether there is a cap on liquidity available from cash and investment portfolios; The definition of "endowment"; and How loan covenants might work or even if they apply. To address the 2nd and 3rd bullets above, we would recommend that for nonprofits, like ETS, that do not have endowments, that the maximum allowed for endowments apply to their cash and investments. In addition, while we understand why the Federal Reserve has tried to maintain similar terms between the MSLP business program and the proposed MSLP nonprofit facility, we believe the terms in the MSLP nonprofit facility should reflect the unique nature of nonprofits. Accordingly, given the financial cycle of nonprofits, we recommend that the nonprofit facility should offer longer deferments and repayment terms than what is currently included in the proposed term sheet.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Specifically, under "eligible loans" item #2 "principal payments deferred for two years and interest payments deferred for one year (unpaid interest will be capitalized)," we ask that the capitalization of unpaid interest requirement be waived. Similarly, item #3 "principal amortization of 15% at the end of the third year, 15% at the end of the fourth year, and a balloon payment of 70% at maturity at the end of the fifth year" we ask to be waived. Since a balloon payment may be difficult for those nonprofits that might be impacted for several years following the COVID-19, we would recommend that the nonprofit be allowed to elect which payment method to utilize. We also recommend that the interest rate on the MSLP nonprofit loans be set below the rate for the MSLP business loans, currently set at an adjustable rate of LIBOR + 300 basis points. Non-profits seek to serve their respective missions while remaining solvent, compared to for-profit entities which work to maximize net revenues so as to generate a surplus through normal business activity to cover borrowing costs. Rather than LIBOR plus 3 percent, we propose that the Fed set the margin above LIBOR at a lower level for non-profit borrowers, ideally at a level sufficient to cover the costs of the program without generating a net gain for the Federal Reserve. An attractive and competitive interest rate will help nonprofits as we continue to play an essential role in the United States long-term economic recovery. We thank you for your consideration and look forward to working with you on this and other important loan programs as the Federal Reserve responds to the COVID-19 crisis. Respectfully submitted, Nancy Segal Executive Director Government and External Relations ETS nsegal@ets.org 202-841-2278

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Ponsor	Andrea	aponsor@sahfnet.org	Stewards of Affordable Housing for the Futrure	June 22, 2020 Submitted Electronically at FederalReserve.gov Board of Governors Federal Reserve Re: Main Street Lending Program- Nonprofit Organization Facilities To whom it may concern: Thank for you this opportunity to provide comments on the Nonprofit Organization Facilities under the Main Street Lending program. Stewards of Affordable Housing for the Future (SAHF) appreciates the Federal Reserve's recognition of the vital role of nonprofit organizations as employers and community institutions and the important role that they will play in an equitable economic recovery. SAHF is a policy collaborative comprised of thirteen mission-driven, multi-state non-profit affordable housing developers - Mercy Housing, Volunteers of America, National Church Residences, National Housing Trust, The Evangelical Lutheran Good Samaritan Society, Retirement Housing Foundation, Preservation of Affordable Housing, The NHP Foundation, BRIDGE Housing, CommonBond Communities, Community Housing Partners, Homes for America, and The Community Builders. SAHF members preserve and develop affordable multifamily homes that expand opportunity and create dignity for low-income persons with disabilities, the elderly, families, and the homeless. By efficiently and creatively leveraging private, public, and philanthropic resources, SAHF members have developed or preserved more than 140,000 affordable rental homes across the county. The affordable homes that SAHF members create and preserve are a source of stability and resilience for residents and communities. SAHF members partner with other specialized nonprofits to address the holistic needs of their residents. In addition to building homes, SAHF members create jobs at the local level and in corporate offices. They employ thousands of people across the country. We appreciate the flexibility that the Federal Reserve has tried to create in the nonprofit extension of this program. However, we are concerned that while some of the eligibility requirements are well-suited for manufacturing and profit-motivated businesses that sells goods, they don't contemplate the broad and complex range of business models used by nonprofit organizations, including developers and operators of affordable housing. Many nonprofits, including SAHF members, do not have endowments that generate significant income. Many have revenue-generating activities other than fundraising as well. Affordable housing developers typically do not have endowments and rely primarily on development fees, distributions from operating properties, and management fees. The comments below address how the eligibility criteria apply to nonprofit affordable housing developers, but we recognize that the eligibility criteria will present different challenges for other types of nonprofits and we encourage the Federal Reserve to apply flexible/adaptive criteria that recognize the unique models of nonprofits. Eligible Loans Terms While many SAHF member nonprofits anticipate that they may need the resources provided by a Main Street loan, the terms on which the loans are proposed are challenging. First, the LIBOR plus 300 basis point rate is higher than what most organizations are charged for lines of credit from their banks. we urge the Federal Reserve to pursue a lower interest rate to make this program more feasible for nonprofits. Further, the five-year term of the loan could limit the utility of this resource. Consistent with the analysis of many financial experts, SAHF members anticipate that the current recession will impact their organizations for years to come, but the extent of the impact is not yet known. This is particularly true because of the long lead time of developing real estate. Bringing a new affordable housing development to market can take three to five years. For this reason, a five-year repayment term for impacts not yet fully realized makes the loan program less attractive. Line of Credit, Revolving and Prepayment SAHF members that may need a loan under the Main Street program in the months and years to come are interested in preserving their access to this important resource, but are concerned about the cost and financial impact of having the loan outstanding before or for longer than it is needed. To minimize borrower interest expense and risk to the government, we encourage the Federal Reserve to consider making these funds available as a line of credit with a term of five years from the date first drawn upon. If a letter of credit is infeasible, the Federal Reserve could allow these loans to prepaid and redrawn within the five-year eligibility provided that the maturity shall not exceed the original five-year window. Further, SAHF members are concerned about the cost and impact of keeping the loan outstanding for longer than it may be needed, so we ask that you confirm that there will be no restrictions on or penalty/yield maintenance for prepayment. Subordination Lenders should be allowed flexibility to allow the Main Street loan to be subordinate to existing debt if all debt is current and the organization

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							meets other leverage requirements. Nonprofit housing organizations often operate with significant leverage at both the property and corporate level. These borrowings are used to bridge the long timelines from inception to completion of a housing development project. Much of this debt is from other public sources and subordinate to senior commercial debt. It will be very difficult if not impossible to have all lenders agree to subordinate to the new Main Street loan. This will substantially impact the ability to use this tool by housing nonprofits, so it is critical that an alternate criterion be identified. Further, the interest rate that is proposed by the Main Street program fits with the idea that this will not be the most senior debt they carry but rather that it will be subordinate debt that fits within leverage requirements. Security For housing nonprofits this product would be very useful if the nonprofit was allowed to pledge an interest in one or more specific future developer fee receipts on projects that have closed and are in construction, with the option of substituting additional such collateral through the five-year term. This could also have the advantage of providing the lender and the Federal Reserve with specific collateral to lend against obviating the need for the subordination requirement. If the LTV ratio of such loans was 65-85% of the developer fees pledged, the nonprofit would have current access to future developer fees while still providing the lender and the Federal Reserve with a margin of safety. Eligible Borrowers Parent Organization as Borrower The Eligible Borrower requirement should be applied only to the parent nonprofit entity. Most housing nonprofits operate through numerous single purpose entities owning real estate. In general, the requirements surrounding the low income housing tax credit (LIHTC), requires a structure where the single purpose entity is controlled by the nonprofit, but the housing nonprofit has only a less than 1% interest, nevertheless the entities are required to be consolidated according to GAAP. Since the single purpose entities are designed to generate operating losses for investors due to depreciation of real estate assets and accrued but unpaid interest on soft debt, housing nonprofits generally generate losses on a consolidated basis. These losses will impact the eligibility of well-run nonprofits for Main Street loans if GAAP consolidated affiliates are included. For these reasons the loan qualifications should be applied on a parent-only basis to make this a useful tool for housing nonprofits. However, it is equally important that borrowers be allowed to use proceeds to support the operation of affordable housing properties owned by single asset entities since their stable operation is key to to well-being of people with limited economic means. Flexible Approach on Financial Requirements (Criteria 6-8) The relatively unique nature of large nonprofits, particularly nonprofit affordable housing developers, makes the earnings, depreciation, amortization, liquidity and debt ratio requirements of items 6-8 inaccurate measure of financial health. We have outlined key concerns in the bullets below. We encourage the Federal Reserve to adopt a flexible approach that may allow lenders discretion to underwrite Main Street loans that meet some minimum number, but not all, eligibility requirements. o EBIDA (Criteria 6): Most housing nonprofits operate through numerous single purpose entities owning real estate. In general, these single purpose entities are controlled, but the housing nonprofit has only a less than 1% interest, nevertheless the entities are required to be consolidated according to GAAP. Since the single purpose entities are designed to generate operating losses for investors due to depreciation of real estate assets and accrued but unpaid interest on soft debt, housing nonprofits generally generate losses on a consolidated basis. For these reasons the loan qualifications should be applied on a parent-only basis to make this a useful tool for housing nonprofits. o Liquid Assets (Criteria 7): Nonprofits operating without substantial endowments may not hold cash equal to 90 days of operating expenses. This would be much more helpful if this threshold were 30 days. This would be particularly helpful for direct service nonprofits, like some of the partners of SAHF member organizations, that are dependent on government and private sector partners paying invoices on time and therefore subject to frequent fluctuations in cash, particularly during this crisis. We appreciate your efforts to adapt this program to the needs of nonprofits that strive to create more equitable communities. Please contact Andrea Ponsor (aponsor@sahfnet.org) with any questions.
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Hassler	Therea	thassler@sco.org	SCO Family of Services	SCO Family of Services is one of the largest human services providers in the State of New York. While we are proud of the number of New Yorkers we are able to serve, the size of our workforce proved to be a barrier in qualifying for COVID-19 relief from many federal programs. We would like to request support for nonprofits to be included in the Main Street Lending program and that considerations for the "essential" and ongoing need for our services to vulnerable be included in the eligibility, application, and disbursement process.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Cauce	Ana Mari	smcastro@uw.edu	University of Washington	June 22, 2020 The Honorable Steven Mnuchin The Honorable Jerome Powell Secretary Chairman U.S. Department of Treasury Board of Governors of the Federal Reserve System 1500 Pennsylvania Avenue NW 20th Street and Constitution Avenue NW Washington, DC 20220 Washington, DC 20551 Dear Secretary Mnuchin and Chairman Powell, I submit the following comments regarding the creation of the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility. I appreciate the changes that the Federal Reserve already has made to the Main Street Lending program (MSLP) and the announced creation of the two new lending facilities for non-profits. At the same time, I am concerned that those facilities, even with the addition of the proposed facilities aimed at nonprofit organizations, will leave out a critical sector of society that is facing unique challenges: this nation's public colleges and universities, few of which may have 501(c)(3) status. Unfortunately, the participation criteria for these facilities make significant portions of the public higher education sector ineligible. For our nation's public colleges and universities, access to affordable capital is a necessary lifeline as they navigate the economic fallout from the COVID-19 crisis. We strongly urge you to expand the proposed non-profit facility to include all public institutions of higher education, regardless of the number of employees they employ, the size of their endowment, or their tax status. As a result of the COVID-19 pandemic, the public higher education sector is facing financial challenges not faced by any other sector: For public institutions, state support, which forms the backbone of their finances, will undoubtedly decrease significantly for years to come. Many states are already forecasting significant budget shortages, and higher education typically bears a significant proportion of cuts in any state budget constriction. Nationally, public institutions of higher education will ultimately see cuts in the billions. The state cuts will compound already a dire financial situation. By the start of the new academic year, institutions will already have lost billions in revenue from this current year due to refunds provided to students just for room and board. Revenues provided by auxiliary services have been decimated and will not recover soon. These include, but are not limited to: parking services, bookstore agreements, summer and sports camp fees, student health services, and revenues generated by intercollegiate athletics. The costs of transitioning to a virtual delivery system will cost millions initially but will take years to fully tally up. Just as important, with so much uncertainty, countless numbers of students will choose different higher education options than the ones they originally planned, including many taking gap years or foregoing higher education altogether. Tuition revenues will be severely impacted going forward. The cleaning of campuses and facilities for the eventual return of students, staff, and faculty-especially those at public research universities-will require unprecedented, on-going, and constantly updated efforts. For those with hospitals and medical centers, institutions have had to bear the brunt of providing COVID-related services without the commensurate level of compensation. Worse still, their revenues have cratered because of the loss of elective procedures and regular medical visits and will not recover any time soon. All of these developments are occurring simultaneously while many of the large public universities look to continue to serve as one of the largest, if not the largest, employers in a given community or region. To address this unique set of circumstances, I ask for the creation of a long-term, low-cost loan program for large public and private non-profit universities that would allow them to refinance their existing debt to free up much-needed capital to address these and other pressing needs. This loan program would not allow institutions to escape their existing loan or debt obligations; this would simply be a mechanism to refinance such obligations and significantly restructure their budgets and obligations on an enduring timeframe with a significantly impactful scale. I urge the Fed to open a program that would offer funding with the following criteria: Given the host of financial challenges loans should be offered at zero interest or no more than LIBOR plus 100 BPS. All public higher education institutions should be eligible and deemed credit worthy as an instrumentality or political subdivision of the state

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							regardless of employee numbers or annual revenue. Any eligible institutions should have credit rating as investment-grade or above. However, for institutions without public credit ratings or that are in financial trouble and have been downgraded due to the pandemic effects, there should be a case-by-case exception since they are the schools that most significantly need the help. Institutions with hospitals and hospital systems should be allowed to be separately considered for eligibility purposes under the program. Institutions should be able to originate new loans to cover costs such as: a covered loss or expense; wages, taxes, and other costs incurred for paid sick, medical, or family leave; costs related to the continuation of employee health care benefits; employee salaries; utilities; and to defease or refinance any outstanding institutional debt [for debt service savings, which can then be applied to address financial impacts of COVID-19]. Given the financial cycle of colleges and universities, loans should have longer deferments and repayment terms than what is currently included in the MSLP. Any enrollment declines at the start of fall 2020 will affect institutions for at least an additional four years as that smaller class advances through their degree programs. In addition, public institutions will have a decrease in state funding dollars, and many institutions have not recovered from state cutting cuts that occurred in the 2008 recession. A longer repayment period (at least 20 years or the statutory authority of the institutions to hold debt) as well as a longer deferment period (at least 2 years or longer) will help to ensure colleges and universities are on better financial standing to make payments on these loans. While I am encouraged by the steps that the Department of Treasury and the Federal Reserve have taken to create these lending facilities which will help our districts and communities, I ask that you take the steps necessarily to ensure that this critical sector of our society is eligible to participate in the facility program. I ask that you expand the facility program to make all public institutions of higher education for the new nonprofit organization loan facility at expanded terms. Sincerely, Ana Mari Cauce President University of Washington

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Walling	Laura	laura.walling@goodwill.org	Goodwill Industries International, Inc.	To Whom It May Concern: On behalf of Goodwill Industries International, Inc. and our network of 152 local autonomous Goodwill® organizations around the country, thank you for the opportunity to comment on the proposed Nonprofit Organization Loan Facilities. Goodwill works to enhance people's dignity and quality of life by strengthening their communities, eliminating their barriers to opportunity, and helping them reach their full potential through learning and the power of work. Goodwills provide employment, job training and other community-based programs for people who are working to build skills, advance careers and make better lives for themselves and their families. To pay for its programs, Goodwill sells donated goods and other household items in stores and online marketplaces. Since the pandemic began, many of our donated goods stores were closed, greatly impacting our primary source of revenue. As areas are beginning to reopen, additional costs to ensure the safety of our employees, program participants, shoppers, and donors have been incurred. The vast majority of local Goodwill organizations have been ineligible to receive adequate financial relief, hence we are appreciative of the Federal Reserve for the creation of a program specifically for nonprofits and to Congress for the encouragement to do so. Charitable nonprofits have unique financial structures. The proposal is more applicable for nonprofits such as hospitals and educational institutions than at nonprofits like Goodwill that have a larger reliance on donations from the public to support their missions. Indeed, we pride ourselves on the ability to offer many services at no charge. With that in mind, Goodwill respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below. 1. The Proposal to Limit Loans to Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Organizations Goodwills raise money and receives donations from the public, foundations, corporations and others to fund our mission. Charitable organizations play a fundamental role in strengthening civil society. Our organizations provide vital services for veterans, older workers, second chance individuals, people with disabilities, opportunity youth and others, and pride ourselves on the donations we receive rooted in the trust and support that the public has of the sector. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations, and instead make 501c(3) organizations that are otherwise meet the employee size are eligible. 2. More Favorable Loan Terms for Charitable Organizations Are Needed The proposal imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. It is important to note that the majority of social service nonprofit funding comes from government grants contracts, recognizing the key role such organizations play in serving the most vulnerable. Numerous studies confirm that government funding seldom covers the full cost of providing contracted work, which inhibits nonprofits from accumulating reserves through surpluses. In many instances, government grant/contract work creates cash-flow challenges since it is paid after the work has been completed and can be subject to significant delays in payment. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements #7 and #8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and making the loan origination 50%. We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							with a 70% balloon payment at the end of the fifth year of the loan would be off-putting for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: We urge that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the 5-year amortization were extended to 7 years, this could lessen the balloon payment. We request that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 3. The Ratio of Adjusted 2019 Earnings before EBIDA Should Be Revised The proposal requires borrowers to have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization (EBIDA) to unrestricted 2019 operating revenue, greater than or equal to 5%." This threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria alone, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also so as to not leave excess surpluses that could be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic plan-a negative ratio at one isolated point is not always an indication of instability. Furthermore, the footnotes for criteria #6 clarify that "The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude contributions raised for a capital campaign, excluding other capital funds included in an annual budget for maintenance and planned upgrades would further decrease the required ratio. Recommendation: The 5% requirement should be reduced to zero or eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility. Finally, further clarification on the calculation methodology -in the context of nonprofit operating budgets- is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. 4. "Reasonable Efforts" Regarding Employee Retention Require Further Clarification The description of "Retaining Employees" in the draft term sheet requires refinement if the Federal Reserve expects nonprofits to take advantage of this facility. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation: "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in with the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. Recommendation: The terms "maintain its payroll" and "retain its employees" are vague and need further refinement. We ask the Federal Reserve to make clear that nonprofits participating in the Main Street loan program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. Recommendation: We ask that the Federal Reserve adopt safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. 5. Additional Recommendations and Requests for Clarification Goodwill respectfully requests the Federal Reserve clarify the following issues in its final expansion notice. Endowment: What resources should be included in endowment calculations? Does it include restricted endowments? Does it extend to include

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							cash on hand? Collateral: Flexibility on collateral is requested. The loan should be able to be approved with no more than 50% Loan to Value (LTV) if collateral is needed. Other Debts: The proposal requires that borrowers, "refrain from repaying the principal balance of, or paying any interest on, any debt until the Eligible Loan is repaid in full, unless the debt or interest payment is mandatory and due." We request that this exclude lines of credit and other debt that are assumed to provide financial liquidity related to the impact of COVID-19 In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation recovers - providing job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness in the next round of COVID-19 relief legislation. Again, Goodwill is grateful for the Federal Reserve embarking to create a lending facility to meet the specific needs of nonprofit organizations in order to provide much needed relief. Thank you for considering our request. Sincerely, Laura Walling Laura Walling, Esq. Senior Director of Government Affairs Goodwill Industries International
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Pickman	Heidi	hpickman@cameonetwork.org	CAMEO	Many nonprofits do not fit the size or donation requirements. We ask that you consider lowering the number of employees and the raise the percent of income from donations. Thank you.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Wolanski	Nancy	Personal Email Address	Grantmakers Council of Rhode Island	RE: Main Street Lending Program - NONLF and NOELF Dear Chairman Powell: I am respectfully submit the following comments to the Federal Reserve System in response to "a proposal to expand its Main Street Lending Program to provide access to credit for nonprofit organizations," as published in the Federal Reserve press release on June 15, 2020. It is important that the Board of Governors of the Federal Reserve System broaden the eligibility requirements to include small nonprofits and include a provision that makes loans forgivable for nonprofits. The COVID-19 health crisis and resulting economic downtown have spotlighted the critically important role nonprofit organizations play in supporting communities, providing access to services, and building the foundations for recovery from family and community challenges. Many nonprofits providing vital support like emergency services, basic needs, workforce development, early childhood programming, health services, and school/afterschool programs have lost significant critical revenue because of the cancellation of planned fundraisers in accordance with public health guidelines. Some have been able to access PPP funds, but those will be expiring soon, and many are in danger of closing without additional access to funding. According to a recent survey done by Independent Sector, 83% of mid-sized nonprofit organizations have experienced a reduction in revenue due to COVID-19, with 71% of those organizations having to scale back their services as a result. It is important to note that mid-sized nonprofit organizations in the IS survey are defined as organizations with between 500-5000 employees. With nonprofits of that size being severely injured by this pandemic, smaller nonprofits operate with much smaller operating reserves, if any, and many essential community organizations are in danger of closing permanently. The term sheet for the proposed nonprofit loan facility imposes a size minimum that is not imposed in the Main Street New, Priority, or Expanded Loan Facilities for for-profit businesses. There is no explanation why the Federal Reserve is proposing that nonprofits with fewer than 50 employees should not be eligible for Main Street loans for which their small business counterparts of equal size could secure lending support. Moreover, these nonprofits are often led by and serve communities of color, communities hardest hit by the COVID-19 pandemic. The Federal Reserve noted in its press release that "nonprofits provide vital services across the country." The Federal Reserve System's proposed expansion of the Main Street Lending Program would provide important access to credit for nonprofit organizations. But the proposed eligibility guidelines would leave vital community organizations without any access to credit to keep providing services to the communities hardest hit by the pandemic and recession. Not including a forgiveness provision would create further obstacles for organizations dealing with the most severe fallout from the pandemic. The Federal Reserve System needs to include a loan forgiveness provision and open eligibility requirements to include nonprofits with less than 50 employees in the Main Street Lending Program to provide access to credit for nonprofit organizations. Similarly, Congress should include these changes in the next round of COVID-19 relief legislation. Thank you for your support of this vital employment sector at this critical time. All the best, Nancy Wolanski

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Hoblitzell	Tyler	tyler.hoblitzell @heart.org	American Heart Association	Comments to the Federal Reserve from the American Heart Association As the nation's oldest and largest voluntary organization dedicated to fighting heart disease and stroke, the American Heart Association (AHA) appreciates the opportunity to submit comments to the Federal Reserve System (the Fed) about the Nonprofit Organization Loan Facilities. Nonprofits have stepped up to meet the unprecedented level of need in our country in response to the COVID-19 pandemic. Specifically, the AHA has committed $2.5 million in rapid response research awards to better understand COVID-19 and its interaction with heart and brain systems. AHA has also developed the first COVID-19 focused registry to aggregate data and aid research, treatment protocols and risk factors tied to adverse cardiovascular outcomes. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector show that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. More than 80% of responding nonprofits reported significant reductions in revenue, and nearly half reported reductions in staff at the same time that they are experiencing increasing demand for services. This model of "doing more with less" is not sustainable. While we are focused on mid-size nonprofits that have been ineligible for the Paycheck Protection Program, the job losses are across the sector. Data from Johns Hopkins University estimate that 1.6 million nonprofit jobs have been lost in the last three months. In general, the program as currently proposed is designed more for transactional nonprofits that function like businesses, such as hospitals and institutions of higher education, than for other nonprofits that rely more heavily upon donations from the public to support their missions, like the AHA. This is counter to bipartisan Congressional intent in the CARES Act (Sec. 4003). Recognizing that the two nonprofit business models are different, even if both types of charities are inherently organized around a public mission, shows that many of the financial requirements included in this proposal simply are not applicable to, or workable for, organizations that rely on donations to support their operations. With that in mind, the AHA respectfully requests the Fed address the concerns and proposed changes outlined below. 1. Limiting Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Charitable Sector The Fed's criteria that organizations must have revenues from donations that are less than 30% not only disqualifies many charities, including the AHA, but also runs counter to nonprofits' missions. In fact, to retain tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, charitable nonprofits must meet a "public support" test showing they receive at least a third of their revenues via contributions from the general public, contributions or grants from other public charities, or from governmental agencies. Overall, this loan facility seems more applicable to for-profit entities, as well as educational institutions and nonprofit hospitals, but not most charitable organizations. For example, the AHA received approximately 65% of its revenue from charitable donations in 2019. Donations from the public, foundations, corporations, and others to fund education and outreach activities, as well as cardiovascular and cerebrovascular disease research. In fact, the AHA is the largest private not-for-profit funding source for research on these diseases after the federal government. Our organization provides vital services for individuals at-risk of or living with cardiovascular disease and prides ourselves on the donations we receive, reflecting the trust and support that the public has in us to provide those services. Recommendation: Eliminate the requirement that no more than 30% of an organization's 2019 revenues come from donations, and instead make nonprofit organizations that otherwise meet the employee size eligible. 2. Increase the Maximum Loan Amount in the Main Street New Loan Facility (MSNLF) The draft MSNLF requires that maximum loan size of an eligible loan be "the lesser of (i) $35 million or (ii) an amount that, when added to the Eligible Borrower's existing outstanding and undrawn available debt, does not exceed four times the Eligible Borrower's adjusted 2019 earnings before interest, taxes, depreciation, and amortization ("EBITDA")." Therefore, the maximum amount an organization can borrow if it does not have a qualifying loan facility currently in place is $35 million, but if it has a qualifying facility in place then the maximum is $300 million. For a larger nonprofit organization like the AHA that does not have an existing loan facility, $35 million is an insufficient amount. Recommendation: Access to loans under the Main Street Lending Program should not be so limited by whether or not an organization is a current borrower. As such, the maximum loan amount under the MSNLF should be increased to at least $75 million. 3. Make Loan Terms More Favorable to Charitable Organizations

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Specifically, we are concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be onerous for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: We urge that the loan terms, including interest rate and balloon payments, be revisited and we recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans that are available for small nonprofits. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the five-year amortization were extended to seven years, this could lessen the balloon payment. We request that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 4. Revise Ratio of Adjusted 2019 Earnings before "EBIDA" In the "Draft for Public Consultation," for both the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility, one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%" (#6). In the context of nonprofit operations, this threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria alone-seemingly written more in the context of for-profit businesses than for nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also so as to not leave excess surpluses that could be used for fulfilling their missions. Furthermore, the footnotes for criteria #6 clarify that "The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude contributions raised for a "capital campaign," excluding other capital funds included in an annual budget for maintenance and planned upgrades would further decrease the required ratio. Recommendation: The 5% requirement should be reduced, if not eliminated. In addition, further clarification on the calculation methodology-in the context of nonprofit operating budgets-is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. 5. Clarify "Reasonable Efforts" Regarding Employee Retention The description of "Retaining Employees" in the draft term sheet requires refinement if the Fed expects nonprofits to take advantage of this facility. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation: "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in which the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. One option would be to add the qualifier "mission-based" before "reasonable efforts." Recommendation: The terms "maintain its payroll" and "retain its employees" are vague and need further refinement. We ask the Fed to make clear that nonprofits participating in the Main Street Lending program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. Recommendation: We ask that the Fed adopt safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. 6. Additional Recommendations and Requests for Clarification The AHA respectfully requests the Fed examine the following issues in its final expansion notice: Effective Date: The AHA requests that the effective date coincide with the release of the final criteria, not the release date of the proposed criteria as currently written (June 15). Endowment: What resources should be included in endowment calculations? Does it include restricted endowments? Does it extend to include cash on hand? Collateral: Flexibility on collateral is requested. The loan should be able to be approved with no more than 50% Loan to Value (LTV) if collateral is needed. Other Debts: The proposal requires that borrowers, "refrain from repaying the principal balance of, or paying any interest on, any debt until the Eligible Loan is repaid in full, unless the debt or interest payment is mandatory and due." We request that this exclude lines of credit and other debt that are assumed to provide financial liquidity related to the impact of COVID-19. It is a welcome development to see the Fed is making its Main Street Lending program available to some nonprofits through Nonprofit Organization Loan Facilities. However, even with the changes we've offered to make the program available to the full breadth of midsize and large nonprofits, this assistance will still fall short of what is most needed by nonprofit organizations-a provision that makes these loans forgivable. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. By definition, nonprofit organizations are mission-driven, not profit driven. Any dollar directed toward interest payments is a dollar not directed toward critical services, medical research, and other activities that benefit the community and the public writ large. The Fed's proposal for Nonprofit Organization Loan Facilities, if revised as we have suggested, will provide important relief to the sector. Nevertheless, the AHA and other nonprofit organizations will continue to press Congress to include loan forgiveness in future COVID-19 response legislation. The AHA thanks you for taking this important step of creating a loan program specifically targeted at mid-sized nonprofit organizations that have been greatly impacted by this emergency. We look forward to working with you on the details to create a program that will be most effective for our organization as well as other similarly situated nonprofits.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF and NOELF	PIO (E-mail)	6/22/2020 12:00:00 AM	Chasin	Samuel	samuel.chasin @ymca.net		FOR YOUTH DEVELOPMENT ® FOR HEALTHY LIVING FOR SOCIAL RESPONSIBILITY June 19, 2020 Federal Reserve Board of Governors Constitution Ave NW &, 20th St NW Washington, DC 20551 Emailed to: regs.comments@federalreserve.gov. Subject: Main Street Lending Program - NONLF and NOELF RE: Comments on the "Draft for Public Consultation" the Mainstreet Lending Program for Nonprofits To Whom It May Concern: The YMCA of the USA (Y-USA) is respectfully submitting these comments in response to the Federal Reserve Board's announcement on June 15, 2020 that it is seeking public feedback on the proposal to expand its Main Street Lending Program for nonprofit organizations. We appreciate the Federal Reserve Board making this program available to nonprofits; however, there are several concerns outlined below that could help improve the program and make it truly applicable and accessible to nonprofit organizations, such as local YMCAs. YMCA of the USA is the national resource office for the nation's 2,700 local 501(c)3, charitable, nonprofit YMCAs. Each of these YMCAs helps strengthen their local communities through youth development, healthy living, and social responsibility. Annually, YMCAs engage 22 million men, women, and children-regardless of age, income, or background-to nurture the potential of children and teens, improve the nation's health and well-being, and provide opportunities to give back and support neighbors. The Y works side-by-side with its neighbors to make sure everyone has the opportunity to learn, grow, and thrive. Despite mandated facility closures, cancellation of traditional programming and a decrease in giving, the Y has stepped up to address the critical need for safe childcare options and other needed services across the country. At the height of the pandemic the Y offered emergency childcare at more than 1,100 locations for families of medical personnel, essential employees and first responders. With school closures, children cannot access USDA breakfasts and lunch and during this time of economic uncertainty, a rapidly increasing number of adults and families are facing food insecurity. In response, over 1,000 Ys nationwide are providing free grab-and-go meals to help address this urgent need. YMCA OF THE USA 101 N Wacker Drive, Chicago IL 60606

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Jensen	John	john@kanakuk.com	Kanakuk Ministries	Thank you for allowing comments on the proposed Nonprofit Organization New Loan Facility ("Facility"). Generally, our organization is supportive of the proposal as presented. We would offer the following comments for your consideration: Eligible Borrowers: Note 7. Having 90 days operating cash on-hand at the time of loan application may be challenging for some organizations - particularly those with seasonal swings in cash flow (e.g. summer camps) and those who have seen a material drop in donations because of the COVID-19 pandemic. I would suggest provide some discretion for the Lender to assess the Borrowers financial strength and compare to 2019 actual results. For instance, if cash on hand is within 90% of 2019, perhaps it could still qualify for the loan. Note 8. This requirement will likely remove the majority of non-profits from consideration. It is unlikely that many "stressed non profits" will meet this threshold. If they did, they would non likely need to use this facility. For reference, many non-profits upsized their line of credit facilities to provide financial flexibility during the COVID-19 pandemic. If the organization received a PPP Loan (which has not been forgiven), it would increase the cash requirement to qualify for this loan. This penalizes those who took action early and now many not have access to this Facility. We believe Note 8 is not required if the other qualifications remain. If this requirement remains, we believe that any existing undrawn revolver/line of credit should be excluded from this calculation. Eligible Loans: Note 2. Suggest removing the requirement to capitalize the unpaid interest. This comment is not necessary as non-profit GAAP accounting rules should govern how the unpaid interest is treated. Required Borrower Certifications and Covenants. First Bullet. The restriction and covenant is overly broad and would not allow Borrower from meeting their obligations under existing loan facilities. We would suggest restricting the Borrower from making additional principle payments to other loan facilities until this Facility is paid in full. We would also suggest allowing Borrower to repay their line-of-credit throughout the term of the Facility. Fourth Bullet. Suggest adding language that makes it clear that Borrower may continue to make contributions to employees through the nonprofit's retirement plans (401k or 403b), provided that such payments to executives shall not be disproportionate to other employees. Thank you for considering these comments in your program design. If you have questions or wish to discuss in more detail, please do not hesitate to contact me. Thank you, John Jensen

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/22/2020 12:00:00 AM	Stern	Jenna	jenna.stern@vizientinc.com	Vizient, Inc.	Dear Secretary Mnuchin and Chairman Powell, Vizient, Inc. appreciates the Federal Reserve's efforts to gain public feedback regarding the proposed expansion of the Main Street Lending Program to provide access to credit for nonprofit organizations. In response to, "Nonprofit Organization Expanded Loan Facility" and "Nonprofit Organization New Loan Facility" term sheets, which are drafts for public consultation, Vizient offers the following responses for the Federal Reserve's consideration. Background Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality and market performance for more than 50% of the nation's acute care providers, which includes 95% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than $100 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States. Recommendations The financial relief opportunities included in the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) have provided welcome assistance to Vizient's members as they continue to face significant financial hardships. These difficulties stem from a range of issues related to COVID-19, including substantial revenue losses due to the cancellation of elective and routine procedures, acquiring supplies and adapting practices to respond to evolving requirements and patient needs. Hospitals, many of which are small and medium sized-businesses, and their employees are on the front lines of providing vital patient care related to COVID-19, as well as emergency and necessary ongoing care for patients. As such, hospitals' financial wellbeing is of paramount importance. Vizient applauds the Federal Reserve for expanding the Main Street Lending Program to support lending to small and medium-sized businesses, including nonprofit organizations, that were in sound financial condition before the COVID-19 pandemic. In addition, Vizient is pleased the Federal Reserve and U.S. Department of Treasury seek feedback regarding two facilities, which are types of loans, to support lending to nonprofit organizations. These two new facilities are the Nonprofit Organization New Loan Facility (NONLF) and the Nonprofit Organization Expanded Loan Facility (NOELF). While we appreciate these recent actions, we also encourage the Federal Reserve to be flexible in its application of the loan terms, specifically with respect to hospitals and other providers. Health care providers, including public and nonprofit hospitals, have been uniquely impacted by the COVID-19 pandemic and remain in dire need of additional funding streams. Vizient believes that the eligibility terms proposed in the NOELF and NONLF may be unintentionally overly restrictive and, as such, preclude many hospitals from being eligible. Specifically, the Federal Reserve could expand the interpretation of nonprofit organization to include other types of nonprofit organizations (such as public hospitals), remove or increase the endowment cap and, lastly, increase the employee cap. Vizient believes providing these additional flexibilities will help build upon the Federal Reserve's positive work and allow for more front-line hospital providers to be eligible for these critical funds. While the NONLF and NOELF are not specific to hospitals and health care providers, Vizient recommends that, to the extent the finalized terms do not specifically answer hospitals and health care providers' common questions, additional information be made available to help hospitals and care providers determine their eligibility under the program. For example, answering or clarifying the applicability of affiliation principles and making it clear that public hospitals are eligible to participate in the program would be helpful. As hospitals are avidly working to identify methods to stay afloat during this trying time while reevaluating their business models and adapting to numerous regulatory changes, any efforts to support their financial health and reduce burdens are welcome. Conclusion Vizient welcomes the Federal Reserve's responsiveness to nonprofit entities' needs for additional information and modified terms for the Main Street Lending Program. We also appreciate the opportunity to comment on these proposals and reiterate our appreciation of the Federal Reserve's expansion of the Main Street Lending Program. Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank the Federal Reserve for providing us the opportunity to comment. Please feel free to contact me or Jenna Stern at jenna.stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these issues. Respectfully submitted, Shoshana Krilow Vice President of Public Policy and Government Relations Vizient, Inc.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Other: General comment on proposed NONLF	PIO (Email from Web)	6/23/2020 12:00:00 AM	Rice	Harriet	Personal Email Address	Wisconsin's Northwest Heritage Passage/Burnett Area Arts Group	Hello. I am the secretary for a 20-year-old non-profit arts organization based in and serving Northwest Wisconsin (Wisconsin's Northwest Heritage Passage -WNHP) and member of a second non-profit arts group, Burnett Area Arts Group (BAAG) As part of WNWP we do business as Arts in Hand, a medium-sized consignment gallery in Spooner, Wisconsin, that features the original work of more than 40 local and regional artists. Board members and gallery staff are all volunteers. We have no paid staff. Our annual budget, based on membership and gallery income, is $40,000 The gallery closed on March 14 as a result of COVID-19. From January - May, we are normally only open Thursday-Saturday. We just reopened for two days a week on June 5. During this period we lost an estimated $3,500. Not only did the gallery lose revenue, but the consigned artists, like me, also lost income. This may seem like a very small amount of money, but many artists depend on those commissions for their livelihood. Our non-profit revenue depends on the summer tourism traffic and cabin owners. In order to open, we had to spend funds to create cash counter barriers, purchase sanitizing items, masks and advertise, probably spending as much as $2,500. In July, we'll be open three days a week. Some staff volunteers won't come back to work because they are in a vulnerable age category or have vulnerable relatives at home. If this situation continues, we stand to lose even more revenue and are in danger of having to close the gallery. The Main Street Lending program for non-profits that you are proposing won't help us or other small non-profit galleries in rural communities like those in northwest Wisconsin. We need a program that offers grants (not loans) of up to $5,000 to eligible applicants. Eligibility requirements can include showing financial performance data, number of volunteer hours, evidence of community arts educations programs, and classes offered. The grants would be used for conforming to CDC COVID-19 safety requirements, marketing -- especially prior to and during the holiday season, and gallery sanitary maintenance. Thank you for your consideration. Harriet E. Rice, Secretary WNHP/Arts in Hand
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Hsu	William	whsu@nyceec.com	New York City Energy Efficiency Corporation	Please see comments regarding the NONLF and NOELF below: 1. The min 50 employees requirement should be either changed or removed. It is too high a threshold for many non-profits. This requirement also does not align with facilities available to small business. Those facilities do not have the min employee requirement. Non-profits should be treated equally or more favorably. 2. The terms of 5 years and LIBOR +3% is the same as the business facilities, which can be unfavorable for many non-profits. To better support the non-profit sector, they should mirror program-related investments with longer term length (~10 years) and an interest rate between 0 - 2%.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Interiano	Nathalie	ninteriano@cfhnyc.org		Background on Care For the Homeless and the COVID-19 Pandemic As community-based, non-profit organizations committed to ensuring access to health care, FQHCs have been on the frontlines of the COVID-19 pandemic since the beginning. At CFH we serve an especially vulnerable population, individuals and families experiencing homelessness. We provide comprehensive medical and mental health services to 8,000 clients at 24 community health centers in the Bronx, Manhattan, Queens and Brooklyn. 80% of our clients are racial and ethnic minorities, many of whom suffer from multiple chronic health conditions associated with poverty and the effects of racism. 86% of our clients are at, or below, 100% of the federal poverty level, 56% receive Medicaid/Medicare, and 41% are uninsured. Throughout the pandemic, FQHCs have provided a range of critical front-line care and a growing proportion of testing, particularly in the low-income, minority communities they serve. At the same time, FQHCs have experienced a significant decline in revenue, due to the need to curtail many primary and preventive care visits. This combination has placed major financial strain on these non-profit, community-based providers. While FQHCs have received some Federal funding to support COVID relief, for many FQHCs this funding is not enough to reestablish their pre-COVID level of operations, let alone prepare for the increased demand that will result as millions of newly-unemployed and uninsured individuals turn to them for care. To date, the Provider Relief Fund has offered most FQHCs only 2% of their net patient revenues. Recommendation to expand eligibility criteria to allow majority of FQHCs to qualify: Because of these financial needs, CFH was relieved to learn that the Federal Reserve would soon start offering Main Street Loans to non-profits. However, after reviewing the proposed Terms Sheet and consulting with experts , we have concluded that almost no FQHCs would qualify under the proposed eligibility criteria. This conclusion is based on an analysis conducted by Capital Link, a non-profit organization that receives funding from the Federal Department of Health and Human Services to assist FQHCs with accessing capital. Capital Link determined that under the proposed lending parameters: Prior to the pandemic, only 13% of health centers would have met the combined criteria. This includes less than one in five of the FQHCs with over 500 staff, who are currently ineligible for the Paycheck Protection Program. Because of the significant cash declines experienced by FQHCs as a result of COVID-19, at present, far fewer than 13% would be able to meet the DCOH and Cash/Debt ratio at loan origination. The most problematic financial parameters for FQHCs are: EBIDA to unrestricted 2019 operating revenue greater than or equal to 5% Days cash on hand at loan origination equal to or greater than 90 days Ratio of unrestricted cash and investments to outstanding debt (including Main Street debt and CMS Accelerated and Advance Payments) at origination is 65% or greater In order to provide a meaningful program for which approximately 60% of FQHCs would qualify, we request that the Federal Reserve adjust the following lending parameters for FQHCs loans as follows: EBIDA to unrestricted 2019 operating revenue greater than or equal to 3% Days cash on hand at loan origination equal to or greater than 30 days Eliminate the unrestricted cash to debt ratio requirement Lower the minimum employee requirement to 20. In addition, we ask that the Federal Reserve clarify the eligibility requirement that reads: "has not received specific support pursuant to the Coronavirus Economic Stabilization Act of 2020 (Subtitle A of Title IV of the CARES Act)." As you know, Section 4003 of Title IV authorizes the Federal government to make loans to States and municipalities for COVID-19 relief. It is possible that a state or municipality could receive a loan under Section 4003, and use part of it to support FQHCs or other safety net providers. To make clear that FQHCs or other providers who receive this type of support from their state are still eligible for Main Street Loans, we recommend that the term "specific support" be revised to read "direct support." Request for FQHCs to work directly with CDFIs to access Main Street Loans

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Finally, it is important to note that Community Development Financial Institutions (CDFIs) have historically played a major role in providing financing to FQHCs for decades. As such, they understand the FQHC model and are best positioned to underwrite loans to health centers. A coalition of 25 CDFIs who are members of the Lenders Coalition for Community Health Centers have collectively provided more than $2.1 billion in loans to FQHCs, with a default rate of less than 1/10th of 1%. Unfortunately, very few CDFIs would qualify as eligible lenders under the program as it is currently construed. To enable FQHCs to work directly with lenders who best understand their model and needs, we recommend that the Federal Reserve structure the nonprofit portion of the Main Street Loan Program to: Allow CDFIs to participate as lenders in the program; and Allow CDFIs to borrow from the Federal Reserve under the same terms as banks, which would enable CDFIs to offer interest rates to FQHCs at LIBOR +3% We are providing these comments on short notice to accommodate the Federal Reserve's request. We would be happy to provide more detailed comments and/or provide additional information to assist the Federal Reserve in developing a program that will be responsive to the current needs of Federally Qualified Health Centers.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Ring	Kristopher	kring@goodwinlaw.com	Goodwin Procter LLP	To Whom It May Concern: It would be helpful for the new Nonprofit Organization New Loan Facility ("NONLF") and Expanded Loan Facility ("NOELF", together with NONLF, the "New Facilities") to be expanded to be available to growth companies with negative EBITDA. These growth companies have a real need for loans and many are doing great things for the world with technology and life sciences and need access to additional funds to help continue innovation, in particular with respect to safe remote work options, fighting world diseases and illnesses and to keep their employees that provide invaluable knowledge and expertise. Like many companies that have been in existence for only a few years or so, their development of products, drugs, vaccines and services have not grown to a level of having positive EBITDA, but their projections often show progress to where they were on track to have positive EBITDA in the relatively near future before the COVID-19 pandemic hit. Moreover, these businesses do gain access to third party credit facilities from banks as a routine matter in the ordinary, non-global pandemic, course, so participating lenders should be able to underwrite an offering of this product to them. We know these New Facilities are in the stage of receiving comments until June 22, 2020 and that the Federal Reserve said that they could still potentially open up these two Facilities to other companies. It would be helpful if these New Facilities could be opened up to growth companies with negative EBITDA that have a real chance of impacting the world in a positive manner. The below changes would help make these New Facilities available to such growth companies. 1. Change the requirement that the type of company available to use a New Facility be a tax-exempt nonprofit organization described in section 501(c)(3) of the Internal Revenue Code (IRC) or a tax-exempt veterans' organization described in section 501(c)(19) of the IRC, and instead just require that the company not be profitable in fiscal year 2019. 2. Instead of the tests that the borrower has to have (a) a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%, (b) a ratio (expressed as a number of days) of (i) liquid assets at the time of loan origination to (ii) average daily expenses over the previous year, equal to or greater than 90 days and (c) at the time of loan origination, a ratio of (i) unrestricted cash and investments to (ii) existing outstanding and undrawn available debt, plus the amount of any loan under the facility, plus the amount of any CMS Accelerated and Advance Payments, that is greater than 65%, substitute with either a. for privately owned growth companies, a test that looks to a percentage of the most recent 409(A) valuation or post-money valuation from the most recent financing round, or b. for public growth companies, a test that looks to a percentage of 52-week average market capitalization with the end date for the period covered by such test being a date before the start of the COVID-19 pandemic. 3. Change the requirement that the borrower was established prior to, and has been in continuous operation since, January 1, 2015 to match the requirement from the three MSLP facilities that the borrower was established prior to March 13, 2020 4. Lower the required minimum amount of employees from 50 to 25. 5. Confirm that none of the borrower eligibility criteria (including financial tests) apply to affiliates. 6. Have the maximum loan size be the lesser of (a) (i) for NONLF, $35MM, and (ii) for NOELF, $300MM, and (b) 2019 annual revenue (as opposed to average 2019 quarterly revenue) (or an alternative recurring revenue test could be used). 7. Include the tax distribution carve-out from the MSLP facilities in the distribution restriction. 8. As a clean-up comment, the "(b)" needs to be included behind the reference to "Section 4019" in last bullet point of the "Required Borrower Certifications and Covenants" section of the NONLF term sheet and the NOELF term sheet.
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Stein	Oonagh	ostein@gsma.com	GSMA Ltd	We are supportive of the proposal to expand the Main Street Lending Program to include 501c6 Non-Profit Organisations

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
General Inquiry	PIO (Email from Web)	6/23/2020 12:00:00 AM	Wilson	Jerry	jw@bespokei3.com	Bespoke Design & Consulting	During the June 15 webinar, one of the panelists (Kelly) mentioned that if a company does not have its 2019 financials in place to compute an adjusted EBITDA for a loan application, the 2018 EBITDA would be acceptable. Is my understanding correct? Please confirm. Thank you Jerry Wilson
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Hogan	Ernest	ehogan@pcrg.org	Pittsburgh Community Reinvestment Group	Board of Governors of the Federal Reserve System Constitution Ave NW & 20th St NW Washington, DC 20551 June 23, 2020 RE: Main Street Lending Program Expansion to Nonprofits Dear Chairman Powell, On behalf of the Pittsburgh Community Reinvestment Group (PCRG) and our membership of over 60 community development and service organizations representing 75 communities across Western Pennsylvania, I would like to submit a comment regarding the proposed expansion of the Main Street Lending Program. Overall, we are excited to see the Federal Reserve System (FRS) taking a leadership role in addressing the financial fallout of the COVID-19 crisis and the needs of America's diverse nonprofit sector. This proposed expansion is being billed as targeting small and medium nonprofits, but we are concerned that medium and large nonprofits will be the primary beneficiaries. According to the U.S. Bureau of Labor Statistics, 84% of nonprofits have 49 employees or fewer, meaning the vast majority of our country's nonprofits will be excluded. Small nonprofits, the 84% made ineligible for this program, truly make up the main streets of our communities. If the goal is to get desperately needed capital into the hands of nonprofits, then we believe no one should be excluded at the bottom. If it is not possible to remove the floor across the board, then we ask the FRS to consider a special carve-out for nonprofits in LMI, minority, and underserved/distressed census tracts. In Pittsburgh, many of the groups doing hands-on direct service and community development in our neediest communities have nowhere near the required number of employees but are as deserving of help as any other organization. We also request that the FRS be mindful of the potential for a divide in access between large and small cities and urban and rural areas. PCRG and its members are looking forward to the implementation of this proposal, but we would like to see a more inclusive structure, one that takes into account the on-the-ground realities of the vast majority of nonprofits. Thank you for your attention to my comments. Sincerely, Ernie Hogan Executive Director

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Smith	Jamal	jsmith154@iuhealth.org	IU Health	Thank you for the opportunity. The Main Street Lending program appears to provide a great opportunity to leverage IU Health's position as an anchor institution (and one of the largest employers in the state) to help the growth and development of small and minority businesses in Indiana. Additionally, there's potential to leverage the program to address many of the impediments outlined in the IU Health District Plan that supports many of the under-resourced members of our community. There would be a need to quantify 'demand' from the System's perspective, but leveraging the 'buying' power of IU Health could translate into direct incubation of small/minority Indiana businesses. In fact, the idea of a Business "Accelerator" was proposed as a priority project in the IU Health District Plan. This creates an opportunity for IU Health to support growth and expansion of locally-based, minority-owned businesses that, in the future, can assist in the implementation of the hospital's local and minority procurement strategy. Funding may be community benefit eligible because it addresses neighborhood revitalization and supports marginalized populations, both stated goals in the 2014 CHNA. In conjunction with community partners (i.e. Near North Development Corporation [NNDC], Mid-State Minority Supplier Development Council, etc.), anchor institutions (i.e. IU Health) could help launch and expand neighborhood-based and Minority-Owned small businesses, providing training/education, mentorship, physical space, and access to a loan-pool via the Main Street Lending Program. We welcome the idea of discussing the program, and how we can leverage the potential for partnership, further. Thank you in advance for the time and consideration. Jamal L. Smith Government Affairs IU Health
Not Responsive							
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Josephs	Matthew	mjosephs@lisc.org	Local Initiatives Support Corporation (LISC)	comments attached. unable to copy.
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Fitch	Sarah	SFitch@voa.org	Volunteers of America	Comments are attached
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Nichols	Lindsay	lnichols@giffords.org	Giffords Law Center	Comments are attached.
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM			mroth@iff.org	IFF	Comments are attached.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Bugg-Levine	Antony	ABuggLevine@nff.org	Nonprofit Finance Fund	Federal Reserve Bank of Boston From: Antony Bugg-Levine CEO, Nonprofit Finance Fund Date: 22 June 2020 Thank you for the opportunity to provide comments on the proposed Nonprofit Organization New Loan Facility and Expanded Loan Facility Term Sheets. We enthusiastically support these efforts to provide access to credit to these valuable nonprofit organizations, providing them with additional liquidity. We would like to offer the following comments with the objective of making the facility accessible to as many small and medium-sized financially sound nonprofits as possible. We believe that as proposed, many worthy organizations would be deemed ineligible. As way of background, Nonprofit Finance Fund is a Community Development Financial Institution (CDFI) with a 40-year track record lending to nonprofit organizations across the country. In that time, we have provided $942 million of financing to more than 700 organizations, including social service agencies, health centers, charter schools, after school and youth recreation programs, among others. We have had a charge-off rate of 1.04%. ELIGIBLE BORROWERS: Minimum SO employees As currently drafted, the guidelines exclude the majority of nonprofits. With a minimum loan size of $250,000 and a maximum loan size not to exceed 2019 quarterly revenue, the smallest eligible organization is one with annual revenue of $1 million. And the additional eligibility criteria of a minimum of 50 employees would typically imply an organization with even higher annual revenue. ($3.75 million or more by our budget calculations). 92% of nonprofits have annual revenue of $1 million or less; 88% have annual revenue of $500,000 or less (1). These criteria will be especially exclusionary for Black-led organizations. A recent survey found that 60% of Black-led organizations had revenue of less than $500,000, with 82% having 10 or fewer staff. (2) Recommendation: To ensure nonprofits with revenue below $3.75 million have access to this program, we propose a reduction of the minimum number of employees from SO to 20. We also suggest clarifying that the number of employees may include full-time, part-time, and seasonal staff. Even this will likely not help the smallest organizations, but it will greatly increase the numbers that are eligible.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Whitton	Laura	lwhitton@jdrf.org	JDRF	June 22, 2020 COMMENTS TO THE FEDERAL RESERVE JDRF appreciates the opportunity to submit comments to the Federal Reserve regarding Nonprofit Organization Loan Facilities. JDRF is grateful that the Administration and Congress are working to provide relief for mid-sized nonprofits and urges prompt action with solutions that address the needs of the organization, and many others in the same predicament, so it can continue its critical work and sustain its talented workforce. ABOUTJDRF JDRF is the leading global organization funding type 1 diabetes (''T1D") research. Our mission is to accelerate life-changing breakthroughs to cure, prevent and treat T1D and its complications and we collaborate with a wide spectrum of partners in the community to achieve this mission. Founded in 1970 by parents of children with T1D, JDRF has invested over $2 billion in research since its inception. As a mid-sized nonprofit, that employs over 600 people, JDRF relies largely on donor dollars to support its mission. The organization has been impacted significantly by COVID-19 as many of our in-person fundraising events have been cancelled or postponed and those that have been held have fallen short of their projected revenue goals. Over forty percent of JDRF's staff is on furlough and the remainder is working at reduced wages. ABOUT TYPE 1 DIABETES Type 1 diabetes is an autoimmune disease that strikes children and adults suddenly and can be fatal. Until a cure is found and in order to stay alive, people with T1D require lifelong and continuous insulin therapy coupled with continuous blood sugar monitoring. Too much insulin can result in seizures, coma, or death from hypoglycemia, or low glucose levels. Too little insulin over time leads to devastating kidney, heart, nerve, and eye damage from hyperglycemia, or high glucose levels. Because of the nature of T1D, patients and their caregivers use medical products daily and in many cases around the clock, relying on them to try and help maintain glucose control to avoid costly and burdensome short- and long-term complications. RESPONSE TO THE PROPOSAL The current proposal is aimed more at transactional nonprofits such as hospitals and institutions of higher ed and excludes nonprofits like JDRF that have a larger reliance on donations from the public to support their missions. Indeed, many nonprofits pride themselves on offering their services at no charge. Recognizing that their business models are different, even if both types of charities are inherently organized around a public mission, many of the financial requirements included in this proposal simply are not applicable to organizations that rely on donations. With that in mind, JDRF respectfully requests the Federal Reserve address the concerns and proposed changes outlined below. 1. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street Lending Program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations like JDRF - a provision that makes these loans forgivable.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. JDRF is playing a critical role in assisting the T1D community during the pandemic by providing a guide to resources, in English and Spanish, to help people with T1D gain access to affordable insulin and diabetes supplies. The organization is also providing information about what others have done to help with the costs related to diabetes management in response to the pandemic. Also, JDRF has been working with Congress and hospital associations to ensure people with T1D who are hospitalized during the pandemic have access to continuous glucose monitors, which help to better manage blood glucose levels and enable healthcare providers to spend more time focusing on other priorities. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" JDRF and other organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 relief legislation. 2. The Federal Reserve's Proposal to Limit Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in the Charitable Sector The Federal Reserve's criteria that organizations must have revenues from donations that are less than 30% disqualify many charities, including JDRF. Overall, this loan facility seems more applicable to for profit entities, as well as educational institutions and nonprofit hospitals, but not most charitable organizations. JDRF received 94% from donations in 2019. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations. 3. The Federal Reserve Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachanqe Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, JDRF urges the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, the organization asks that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and bringing the loan origination ratio of 40-50% (down from 65% as proposed). JDRF is also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be off putting for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: JDRF urges that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. In addition, the organization urges some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the 5-year amortization were extended to 7 years, this could lessen the balloon payment. JDRF requests that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 4. The Ratio of Adjusted 2019 Earnings before "EBIDA" Should Be Revised In the "Draft for Public Consultation," for both the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility, one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%." (#6) In the context of nonprofit operations, this threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria alone, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also so as to not leave excess surpluses that could be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic plan-a negative ratio at one isolated point is not always an indication of instability. Furthermore, the footnotes for criteria #6 clarify that ''The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital. .." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude contributions raised for a "capital campaign," excluding other capital funds included in an annual budget for maintenance and planned upgrades would further decrease the required ratio.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Recommendation: The 5% requirement should be reduced to zero, if not eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility for a nonprofit borrower. Finally, further clarification on the calculation methodology -in the context of nonprofit operating budgets- is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Gonzalez	Ariel	advocacy@marchofdimes.org		June 22, 202 Via electronic submission via regs.comments@federalreserve.gov Federal Reserve Board of Governors Constitution Ave NW &, 20th St NW Washington, DC 20551 RE: Main Street Lending Program - Main Street Lending Program Nonprofit Organization New Loan facility (NONLF) and Nonprofit Organization Expanded Loan Facility (NOELF) On behalf of March of Dimes, the leading non-profit organization fighting for the health of all moms and babies, thank you for the opportunity to submit comments on proposals to expand the Main Street Lending program to nonprofit organizations through a new loan facility. March of Dimes promotes the health of women, children and families across the life course, from birth through adolescence and the childbearing years, with an emphasis on preconception, prenatal, interconception and infant health. Ensuring that women, infants and families have access to quality care is essential to achieving our goals. At March of Dimes, we have built a legacy working to level the playing field for all moms and babies, no matter their age, socio-economic background or demographics. We support moms throughout their pregnancy advocating for policies that prioritize their health. We support radical improvements to the care they receive, and we pioneer research to find solutions to the biggest health threats to moms and babies. During the COVID-19 pandemic, March of Dimes has offered a variety of robust product and services while experiencing financial hard times due to significantly reduced fundraising capacity that has forced employee furloughs and an across-the-board salary cut for all its employees. Despite these operational challenges, we moved quickly in March to launch the Mom and Baby COV/D-19 Intervention and Support Fund. The Fund is supporting efforts to ensure families stay informed about COVID-19, therapeutics and a vaccine are developed with moms and babies top of mind, and interventions are distributed so everyone across our country has access. We have offered education resources on COVID-19 through a series of webinar events providing the public with critical information on a range of topics impacting their lives during the pandemic, including understanding the risks to pregnancy, maternal mental health, disparities in health care during COVID-19, and access to birthing services, among other emerging issues. We appreciate the Federal Reserve's efforts to develop this new loan program for nonprofits trying to weather the economic downturn while continuing to effectively carrying out their missions and working to respond to the COVID-19 pandemic in communities across the country. However, in order for this program to be truly accessible it must be more tailored to the unique operations and finances of nonprofit organizations than as currently devised. This proposal is aimed more at transactional nonprofits such as hospitals and institutions of higher education than at nonprofits like March of Dimes that have a larger reliance on donations from the public to support their missions. Indeed, we pride ourselves on offering our programs and services at no charge. Because of these inherent differences in how nonprofits operate, we believe many of the financial requirements included in this proposal simply are not applicable to organizations that rely predominantly on donations from the public. With that in mind, March of Dimes respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness The most significant issue with the program is the lack of loan forgiveness for midsized nonprofits. We understand that this is an issue that Congress must address to grant the Federal Reserve additional authority to make the new loans forgivable. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation's recovery-offering education and support to expecting mothers and their families, providing child care, job training, and other supportive services. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness in the next round of COVID-19 relief legislation. Limiting Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Charitable Sector The Federal Reserve's criteria that organizations must have revenues from donations that are less than 30% disqualify many charities, including March of Dimes. Overall, this loan facility seems more applicable to for-profit entities, but not most charitable organizations. March of Dimes received 90% of its revenues from donations in 2019. In fact, the IRS includes a public support test on the annual Form 990 that requires nonprofits to maintain a rate above 33½%. This is done to ensure a nonprofits are relying more heavily on donations from the public than other funding sources like investment income. (See Form 990 Schedule A)
Not Responsive							

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Montanez	Ana	anam@independentsector.org	Independent Sector	June 22, 2020 Federal Reserve Board of Governors Constitution Ave NW &, 20th St NW Washington, DC 20551 Comments of Independent Sector regarding the proposed Main Street Lending Program for nonprofit organizations - NONLF and NOELF Independent Sector-a national coalition of nonprofits, foundations, and corporations whose members represent tens of thousands of organizations and individuals committed to advancing the common good-appreciates the opportunity to submit comments to the Federal Reserve about the Nonprofit Organization Loan Facilities. This proposal is targeted at transactional nonprofits such as hospitals and institutions of higher education than at nonprofits who have a larger reliance on donations from the public to support their missions. Indeed, many nonprofits pride themselves on offering their services at no charge. Recognizing that their business models are different, even if both types of charities are inherently organized around a public mission, many of the financial requirements included in this proposal simply are not applicable to organizations that rely on donations. With that in mind, Independent Sector respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below. 1. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation recovers - providing childcare, job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 relief legislation. 2. The Fed's Proposal to Limit Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Charitable Sector The Federal Reserve's requirement that nonprofit organizations must have less than 30% of their revenue derive from donations disqualifes many charities who in order to retain their tax-exempt

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							status, under Section 501(c)(3) of the Internal Revenue Code, must meet a "public support" test showing they receive at least a third of their revenues from contributions from the general public, grants from other public charities, or from governmental agencies. If a charitable nonprofit fails to do so, then it carries the added burden of providing additional facts and circumstances to prove that it is a publicly supported organization. This loan requirement seems more applicable to for-profit entities, as well as educational institutions and nonprofit hospitals, but not to most charitable nonprofits who provide critical services in their communities during these challenging times. Human service organizations, as well as food banks and pantries are excluded from this lending program based on the percentage of their revenue that is generated by donations. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations. 3. The Fed Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partn ers. the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. It is important to note that the vast majority of social service nonprofit funding comes from government grants contracts, recognizing the key role such organizations play in serving the most vulnerable. Numerous studies confirm that government funding seldom covers the full cost of providing contracted work, which inhibits nonprofits from accumulating reserves through surpluses. In many instances, government grant/contract work creates cash-flow challenges since it is paid after the work has been completed and can be subject to significant delays in payment. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and bringing the loan origination ratio of 40-50% (down from 65% as proposed). We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be off-putting for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Recommendation: We urge that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. If the 5-year amortization were extended to 7 years, this could lessen the balloon payment. We request that the borrower have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 4. The Ratio of Adjusted 2019 Earnings before "EBIDA" Should Be Revised In the "Draft for Public Consultation," for both the Nonprofit Organization New Loan Facility and the Nonprofit Organization Expanded Loan Facility, one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue, greater than or equal to 5%." (#6) In the context of nonprofit operations, this threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria alone, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may certainly be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also as to not leave excess surpluses that could be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic plan-a negative ratio at one isolated point is not always an indication of instability. Furthermore, the footnotes for criteria #6 clarify that "The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital..." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude contributions raised for a "capital campaign," excluding other capital funds included in an annual budget for maintenance and planned upgrades would further decrease the required ratio.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Bruning	Jennifer	jbruning@ksymca.org	Kansas State Alliance of YMCAs	June 22, 2020 Federal Reserve Board of Governors Constitution Ave NW & 20th St NW Washington, DC 20551 FOR YOUTH DEVELOPMENT® FOR HEALTHY LIVING FOR SOCIAL RESPONSIBILITY Subject: Main Street Lending Program - NONLF and NOELF RE: Comments on the "Draft for Public Consultation" the Main Street Lending Program for Nonprofits To Whom It May Concern: The Kansas State Alliance of YMCAs (KSAY) is respectfully submitting these comments in response to Federal Reserve Board's announcement on June 15, 2020 that it is seeking public feedback on the proposal to expand its Main Street Lending Program for nonprofit organizations. We appreciate the Federal Reserve Board making this program available to nonprofits; however, there are several concerns outlined below that could help improve the program and make it truly applicable and accessible to nonprofit organizations, such as local YMCAs. KSAY represents the collective voice and impact of all 11 independent Kansas YMCA associations. Each of these Ys helps strengthen their local communities through youth development, healthy living, and social responsibility. Kansas Ys serve over 550,000 people in 27 communities across the Sunflower State. As public charities, Kansas Ys engage 1 in 4 Kansas children and teens and provide a wide range of activities to nurture their potential and ensure their success. With almost 7,000 volunteers accumulating 328,215 hours of service and over 4,000 employees, the Y is making a difference in all of the communities it serves. Despite mandated facility closures, cancellation of traditional programming and a decrease in giving, the Y has stepped up to address the critical need for safe childcare options and other needed services across the country. At the height of the pandemic Kansas Ys offered emergency childcare for families of medical personnel, essential employees and first responders. With school closures, children cannot access USDA breakfasts and lunch and during this time of economic uncertainty, a rapidly increasing number of adults and families are facing food insecurity. In response, Kansas Ys are providing free grab-and-go meals to help address this urgent need. Citizens in communities of all sizes are depending on local charitable nonprofits to a far greater degree during the response and relief phases to the COVID-19 health and economic crises, and that reliance will only grow during the recovery period ahead (including response and relief for any second and third waves of the virus). KSAY has worked with YMCA of the USA (Y-USA) and local Ys to identify and address areas of confusion and contradiction in regard to the much-anticipated Main Street Lending Program. These real-life, current concerns and questions based on experiences of Ys across America are the basis for the following comments and recommendations.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Comments and Recommendations 1. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation recovers - providing childcare, job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 relief legislation. 2. The Federal Reserve Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. Also, many nonprofits are facility-based and carry planned debt which may be disqualified under the proposed calculation. Furthermore, creditworthiness can be established on other criteria.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and eliminating the specific 65% debt ratio requirement and instead allow a statement of explanation for debt that may be of concern as it relates to credit worthiness. We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is too high. In addition, the imposition of loan origination and service fees adds to the cost. Finally, the 70% balloon payment at the end of the fifth year of the loan would be difficult for many nonprofits, unless provided an opportunity to refinance such loans at low rates. Recommendation: Revisit the loan terms including interest rate and balloon payments and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. We also urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. Extending the 5-year amortization to seven years could lessen the balloon payment. We request that borrowers have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements. 3. The Ratio of Adjusted 2019 Earnings before "EBIDA" Should Be Revised In the "Draft for Public Consultation," one of the eligibility criteria for borrowers is that they must have "a ratio of adjusted 2019 earnings before interest, depreciation, and amortization (EBIDA) to unrestricted 2019 operating revenue, greater than or equal to 5%." (#6) In the context of nonprofit operations, this threshold is too high and would make many, if not most, nonprofits ineligible based on these criteria alone, which seems written more in the context of for-profit businesses as opposed to nonprofit organizations. It may be prudent and necessary to have a positive ratio of adjusted earnings; however, nonprofits generally run on a small margin, both out of necessity and also so as to not leave excess surpluses that could be used for fulfilling their missions. Moreover, at times a nonprofit may have a planned and manageable deficit as part of a strategic plan-a negative ratio at one isolated point is not always an indication of instability. Furthermore, the footnotes for #6 clarify that "The Eligible Lender should calculate operating revenue as unrestricted operating revenue, excluding funds committed to be spent on capital." Many nonprofits have "restricted revenue" through grants and contracts built into their operating budgets. Excluding this revenue would compound the problem of meeting the 5% ratio. Although it would be sensible to exclude Recommendation: The 5% requirement should be reduced to zero, if not eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility for a nonprofit borrower. Finally, further clarification on the calculation methodology-in the context of nonprofit operating budgets-is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. 4. "Reasonable Efforts" Regarding Employee Retention Require Further Clarification The description of "Retaining Employees" in the draft term sheet requires refinement if the

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Federal Reserve expects nonprofits to take advantage of this facility. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation: "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in which the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. One option would be to add the qualifier "mission-based" before "reasonable efforts." Recommendation: Further refine the terms "maintain its payroll" and "retain its employees" are vague, and make clear that nonprofits participating in the Main Street loan program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. Recommendation: Adopt the safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. S. Limitation of SO-Employee Minimum Should Be Removed The proposed nonprofit loan facility imposes a size minimum that is not imposed in the Main Street Loan Facilities for for-profit businesses. There is no explanation why the Federal Reserve is proposing that nonprofits with fewer than 50 employees should not be eligible for Main Street loans for which their small business counterparts of equal size could secure lending support. Recommendation: Remove the 5O-employee floor.
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/23/2020 12:00:00 AM	Wilborn	Brent	bwilborn@okpca.org	Oklahoma Primary Care Association	We would like to echo sentiments of the National Association of Community Health Centers. in that we appreciate the Federal Reserve's intention to expand Main Street Loans to non-profit organizations; however, after analyzing the draft Term Sheet. We believe that few federally qualified health centers (FQHCs) would qualify for these loans under the current eligibility requirements. Therefore, we are requesting that: the loan terms be revised to enable the majority of FQHCs to qualify, and FQHCs be permitted to work with Community Development Financial Institutions (CDFIs) to access Main Street loans. In order to provide a meaningful program for which more FQHCs would qualify, we request that the Federal Reserve adjust the following lending parameters for FQHCs loans as follows: EBIDA to unrestricted 2019 operating revenue greater than or equal to 3% Days cash on hand at loan origination equal to or greater than 30 days Eliminate the unrestricted cash to debt ratio requirement Lower the minimum employee requirement to 20.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Anderson	Sue	sanderson@seattleymca.org	Washington State Alliance of YMCAs	Subject: Main Street Lending Program - NONLF and NOELF RE: Comments on the "Draft for Public Consultation" the Mainstreet Lending Program for Nonprofits To Whom It May Concern: The Washington State Alliance of YMCAs is respectfully submitting these comments in response to Federal Reserve Board's announcement on June 15, 2020 that it is seeking public feedback on the proposal to expand its Main Street Lending Program for nonprofit organizations. We appreciate the Federal Reserve Board making this program available to nonprofits; however, there are several concerns outlined below that could help improve the program and make it truly applicable and accessible to nonprofit organizations, such as local YMCAs. The Washington State Alliance of YMCAs is a collaboration of 15 independent charitable, nonprofit YMCAs with 48 branches. Our YMCAs help strengthen their local communities through youth development, healthy living, and social responsibility. Annually, Washington YMCAs engage over 788,000 men, women, and children-regardless of age, income, or background empowering young people to reach their full potential, improving individual and community well-being, and providing opportunities to give back, by inspiring action in communities. The Y works side-by-side with its neighbors to make sure everyone has the opportunity to learn, grow, and thrive. Despite mandated facility closures, cancellation of traditional programming and a decrease in giving, the Y has stepped up to address the critical need for safe childcare options and other needed services across the country. During the first months of COVID-19, Washington YMCAs collectively: • Showed up for essential workers by opening 74 early learning and school-age sites, caring for 1,562 children daily; • Secured food for children and provided 199,600 meals, in addition to partnering with food banks to store and pack food supplies; • Provided housing for over 345 young adults per week experiencing homelessness and economic division; • Provided over 22,500 check-in calls giving community resource navigation to older adults and others; and • Provided social-emotional supports, free online fitness classes and more. At the height of the pandemic, collectively across the country, YMCAs offered emergency childcare at more than 1,100 locations for families of medical personnel, essential employees and first responders. With school closures, children cannot access USDA breakfasts and lunch and during this time of economic uncertainty, a rapidly increasing number of adults and families are facing food insecurity. In response, over 1,000 Ys nationwide are providing free grab-and-go meals to help address this urgent need. Citizens in communities of all sizes are depending on local charitable nonprofits to a far greater degree during the response and relief phases to the COVID-19 health and economic crises, and that reliance will only grow during the recovery period ahead (including response and relief for any second and third waves of the virus). Y-USA has worked with the Washington State Alliance of YMCAs, other YMCA State Alliances, and local Ys to identify and address areas of confusion and contradiction regarding the much-anticipated Mainstreet Lending Program. These real-life, current concerns and questions based on experiences of Ys across America are the basis for the following comments and

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							recommendations. Comments and Recommendations 1. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation recovers - providing childcare, job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 relief legislation 2. The Federal Reserve Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners, the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. Also, many nonprofits are facility-based and carry planned debt which may be disqualified under the proposed calculation. Furthermore, creditworthiness can be established on other criteria. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							eliminating the specific 65% debt ratio requirement and instead allow a statement of explanation for debt that may be of concern as it relates to credit worthiness. We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is too high. In addition, the imposition of loan origination and service fees adds to the cost. Finally, the 70% balloon payment at the end of the fifth year of the loan would be difficult for many nonprofits, unless provided an opportunity to refinance such loans at low rates. Recommendation: Revisit the loan terms including interest rate and balloon payments and recommend the lowest permissible rate such as the 0.5% rate initially proposed for PPP loans. We also urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation. Extending the 5-year amortization to seven years could lessen the balloon payment. We request that borrowers have access to engage with derivatives (change to a fixed rate) without the minimum swap requirements.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program NONLF and NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Sward	Erika	Erika.Sward@lung.org	American Lung Association	June 22, 2020 The Honorable Jerome Powell Chair Board of Governors of the Federal Reserve System 20th Street and Constitution Ave NW Washington, DC 20551 Re: The Nonprofit Organization Loan Eligibility Proposal Dear Chairman Powell: The American Lung Association appreciates the opportunity to submit comments to the Federal Reserve Board regarding the Nonprofit Organization Loan Eligibility Proposal. The American Lung Association is the oldest voluntary public health association in the United States, currently representing the nearly 37 million Americans living with lung diseases including asthma, lung cancer and COPD. As such, the Lung Association is uniquely positioned to comment on the impact this proposed rule will have on our organization's ability to carry out our mission to save lives by improving lung health and preventing lung disease. Since the start of the COVID -19 pandemic, the American Lung Association has worked to educate the public, advocated on behalf of lung disease patients and promoted research on treatment cures. The American Lung Association appreciates the opportunity to submit comment to the Federal Reserve about the Nonprofit Organization Loan Facilities. This proposal is aimed more at transactional nonprofits such as hospitals and institutions of higher ed. Many nonprofits like the Lung Association that have a larger reliance on donations from the public to support their missions are not eligible under the proposed terms. Indeed, many nonprofits pride themselves on offering their services at no charge. Recognizing that our business models are different, even if both types of charities are inherently organized around a public mission, many of the financial requirements included in this proposal simply are not applicable to organizations that rely on donations. With that in mind, the Lung Association respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below. 1. Mid-Sized Nonprofits Must be Eligible for Loan Forgiveness While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations - a provision that makes these loans forgivable. Congress must act ensure that mid-sized nonprofits have access to loan forgiveness. In this critical time, nonprofits have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are not shutting down. Rather, they are straining to meet increasing demands in our communities on the frontlines, caring for the sick, feeding families, and keeping our communities connected. Furthermore, they will play an integral role as our nation recovers - providing childcare, job training, and other core supports. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Vital services nonprofits provide to communities and the economy by including loan forgiveness. We urge the Federal Reserve to support loan forgiveness for nonprofits in the next round of COVID-19 relief legislation. 2. The Fed's Proposal to Limit Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Charitable Sector The Federal Reserve's criteria that organizations must have revenues from donations that are less than 30% disqualify many charities, including the Lung Association. Overall, this loan facility seems more applicable to for-profit entities, as well as educational institutions and nonprofit hospitals, but not most charitable organizations. The Lung Association received 60% from donations in 2019. The thirty percent criteria is also inconsistent with current tax law for charitable organizations: to retain tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, charitable nonprofits must meet a "public support" test showing they receive at least a third of their revenues via contributions from the general public, contributions or grants from other public charities, or from governmental agencies. We raise money and receive donations from the public, foundations, corporations and others to fund research for treatments and cures for lung diseases, efforts to keep kids off tobacco, including e-cigarettes, and advocating for laws that protect the air we all breathe, and receive very little revenue from direct services. Charitable organizations play a fundamental role in strengthening civil society. Our organizations provide vital services for people with or at risk for lung disease, and pride ourselves on the donations we receive rooted in the trust and support that the public has of the sector. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations, and instead make 501c(3) organizations that are otherwise meet the employee size are eligible. 3. The Fed Needs to Make Loan Terms More Favorable to Charitable Organizations The draft Nonprofit Loan Facility imposes certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for profit businesses. Nonprofit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5%. According to a recent report by Seachange Capital Partners , the median social services nonprofit has a margin of 1.0%, receives 3.6% of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to t9 months of expenses, and operating reserves of less than one month of expenses. Less than 20% of large nonprofits have 6 months or more of operating reserves, a widely accepted standard for "financial strength" for nonprofits. Social services organizations are the most fragile, with fewer than 10% reaching this standard. The statistics above should not be viewed as an indictment of the efficiencies or management policies of nonprofits. It is important to note that the vast majority of social service nonprofit funding comes from government grants contracts, recognizing the key role such organizations play in serving the most vulnerable. Numerous studies confirm that government funding seldom covers the full cost of providing contracted work, which inhibits nonprofits from accumulating reserves through surpluses. In many instances, government grant/contract work creates cash-flow challenges

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							since it is paid after the work has been completed and can be subject to significant delays in payment. Recommendation: Recognizing the unique nature of nonprofit operations and their importance in continuing to provide vital services as partners on the front lines of the COVID-19 crisis, we urge the Federal Reserve to eliminate borrower requirements 7 and 8. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of nonprofit operations, for example by requiring only 30 days cash on hand, and bringing the loan origination ratio of 40-50% (down from 65% as proposed). We are also concerned that certain eligible loan features are too onerous for nonprofit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck Protection Program ("PPP") Loans (1.0%) and that for Economic Injury Disaster Loans (2.75%). In addition, the imposition of loan origination and service fees adds to the cost under the Nonprofit Facility. Finally, the notion that nonprofits would be faced with a 70% balloon payment at the end of the fifth year of the loan would be disastrous for many nonprofits. Nonprofits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Czipo	Linda	lczipo@njnonprofits.org	Center for Non-Profits	Comments to the Federal Reserve from the Center for Non-Profit Corporations, Inc. ("Center for Non-Profits") regarding the proposed Main Street Lending Program for nonprofit organizations - NONLF and NOELF The Center for Non-Profits, New Jersey's state association for the charitable non-profit community, appreciates the opportunity to submit comment to the Federal Reserve about the Nonprofit Organization Loan Facilities. While we are grateful to the Federal Reserve for broadening access to its Main Street lending program so that non-profits may participate, a number of provisions in the Federal Reserve's proposal - some of which are far more restrictive than comparable requirements for for profit businesses - will put this crucial assistance out of reach to many charitable organizations at a time when our communities need them more than ever. The Center for Non-Profits respectfully provides the following recommendations to improve the proposed Nonprofit Organization Loan Programs: I. Loan Forgiveness: The Federal Reserve, either on its own or working with Congress, must recognize the extent to which the public and economy rely on the vital services non-profits provide to communities and the economy by creating a forgivable loan program. The widespread consensus among small for-profit businesses and non-profits alike is that forgivable loans are desperately needed to provide a lifeline during these perilous times. 2. SO-Employee Floor: The Nonprofit Organization Loan programs must be revised to remove the SO-employee floor. Especially since no such floor is required for for-profit businesses, imposing it on non-profits arbitrarily excludes hundreds of thousands of otherwise potentially eligible non-profit applicants from the program. 3. 30% Donations Cap: It is essential that the Federal Reserve eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations. The cap represents a lack of awareness regarding the way most non-profits operate. Indeed, non-profits have been providing services consistently throughout this crisis, often free of charge, and often despite having had to suspend revenue-producing activities, or despite delayed or insufficient payments from government contracts. While the proposed cap may be feasible for some very large institutions, this is a revenue model that does not reflect most of the non-profit community. Indeed, IRS data show that smaller and mid-sized organizations typically generate a larger percentage of their revenues from donations than large institutions do. For the Main Street program to be truly helpful to the organizations that need it most, the donations cap must be removed. 4. Loan Terms: Recognizing the unique nature of non-profit operations and their importance in continuing to provide vital services as partners on the frontlines of the COVID-19 crisis, we urge the Federal Reserve to eliminate the liquidity and debt ratio provisions in the loan requirements. We also recommend lower interest rates in line with other non-profit loan programs and a seven-year amortization. 5. Revising EBITA Ratio: The 5 percent requirement should be reduced to zero, if not eliminated. Further, non-profit borrowers should be allowed to provide a statement of explanation of a deficit so that a negative ratio does not mean automatic ineligibility. Finally, clarification is needed on the calculation methodology - in the context of non-profit operating budgets - regarding both restricted funding from grants in annual operating budgets and capital funds for improvements.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							6. Clarifying Employee Retention Requirements: The term "mission-based" should be inserted before "reasonable efforts" to tailor employee retention requirements to the realities of non-profit operations. The employee retention requirements should also apply based on employment levels on the date of loan origination. The reasonable safe harbor provisions of the Paycheck Protection Program Flexibility Act should be extended to this loan program. 7. Additional Questions/Recommendations: o Endowment: What resources should be included in endowment calculations? Does it include restricted endowments? Does it extend to include cash on hand? o Collateral: Flexibility on collateral is requested. The loan should be available with no more than 50 percent Loan to Value (LTV) if collateral is needed. o Other Debts: The proposal to restrict paying off existing loans should exclude lines of credit and other debt that are assumed to provide financial liquidity related to the impact of COVID-19. The details of these recommendations are discussed in the comments submitted by the National Council of Nonprofits . which the Center for Non-Profits endorses and incorporates here by reference. We respectfully submit that adopting these recommendations will make the Federal Reserve's proposed programs even more helpful to the non-profits that our communities are turning to for help and solutions through this devastating pandemic and beyond. Thank you for your consideration. Very truly yours. Linda M. Czipo, President & CEO

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
	PIO (Letter)	6/23/2020 12:00:00 AM	Wang	Kathy	kwang@chamber-music.org	Chamber Music America	Chamber Music America June 22, 2020 Federal Reserve Board of Governors Constitution Ave. NW & 20th St. NW Washington, DC 20551 Emailed to: regs.comments@federalreserve.gov Subject: Main Street Lending Program - NONLF and NOELF RE: Comments on the Main Street Lending Program-Nonprofit Organization Facilities To Whom It May Concern: Chamber Music America (CMA) was founded in 1977 with the mission to develop, support, and strengthen the chamber music field. CMA defines chamber music as music for small ensembles between two and ten musicians, one per part, generally without a conductor. From 34 founders to a current membership of over 6,000 in all 50 states and Puerto Rico, CMA represents the diversity and changing character of today's chamber music community, encompassing instrumental and vocal ensembles; freelance musicians; large and small presenters; festivals; managers; and advocates. CMA is the only organization that delivers a comprehensive array of career development services and direct financial support to the small ensemble music field. CMA's initiatives promote learning, capacity-building, entrepreneurship, and equitable practices throughout the field, offering financial and information resources as well as mentorship and networking opportunities for artists and administrators to help sustain long-lasting careers and organizations. CMA appreciates the opportunity to submit comments to the Federal Reserve about the Nonprofit Organization Loan Facilities. This proposal is aimed more at transactional nonprofits such as hospitals and institutions of higher ed than at nonprofits like CMA that have a larger reliance on contributed income to support their missions. Indeed, many nonprofits pride themselves on offering their services at no charge. Recognizing that their business models are different, even if both types of charities are inherently organized around a public mission, many of the financial requirements included in this proposal simply are not applicable to organizations that rely on contributions. With that in mind, CMA respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below. 1. Congress Must Act to Ensure Mid-Sized Nonprofits are Eligible for Loan Forgiveness Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending program available to some nonprofits, this assistance still falls short of what is most needed by nonprofit organizations-a provision that makes these loans forgivable. In this critical time, nonprofits have worked diligently to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though they face many of the same economic challenges as other industries, nonprofits are maintaining programs and services to help our country survive this difficult situation. They are struggling to meet increasing demands in our communities on the frontlines, not only caring for the sick and feeding families, but in the area of nonprofit arts, providing comfort and solace through performances online that everyone can enjoy. Furthermore, nonprofits will play an integral role as our nation recovers-providing childcare, job training, and other essential services including those pertaining to mental and emotional health. Charitable nonprofits of all sizes and focus areas are struggling to maintain mission-critical operations despite enormous economic challenges. Data released by Independent Sector shows that nonprofits with between 500 to 5,000 employees, key to scaling relief efforts across the nation, have been severely impacted by this health and economic crisis. When asked "What types of additional assistance would be most helpful to your organization?" organizations overwhelmingly (92% of responses) suggested government support in the form of forgivable loans. Smaller nonprofits

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							throughout the country have been hit equally hard. Nonprofit organizations need funding so they can continue to meet the needs of their communities. Many charitable organizations do not have steady streams of commercial income and have little capacity for loan and interest repayment. Furthermore, nonprofits are the third largest employment sector and many hope to hire more workers as their organizations recover. America cannot afford to leave out such a vital part of the economy. Recommendation: Congress must recognize the vital services nonprofits provide to communities and the economy by including loan forgiveness, in the next round of COVID-19 relief legislation 2. The Fed's Proposal to Limit Loans to Mid-Size Nonprofits with Less than 30% of Revenue from Donations Disqualifies Many in Charitable Sector The Federal Reserve's criteria that organizations must have revenues from contributions that are less than 30% disqualify many charities, including the majority of CMA's member organizations. Overall, this loan facility seems more applicable to for-profit entities, as well as educational institutions and nonprofit hospitals, but not most charitable organizations. Chamber Music America, for example, received 70% of its income from contributions in FY2019. We raise money and receive donations from the public, foundations, and corporations to fund our grant programs, professional development resources, and communication initiatives for the small ensemble music community and we do not receive any revenue from direct services. Charitable organizations play a fundamental role in strengthening civil society. Our organization provides vital services for artists, educators, administrators, and music businesses across the country and are pleased that the public believes strongly enough in our programs and services to support our efforts. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations, and instead make eligible 50l(c)(3) organizations that otherwise meet the employee size requirement.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF and NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Vu	Thomas	thomas.vu@aiccu.edu	AICCU	CALIFORNIA COLLEGES AND UNIVERSITIES Kristen F. Soares, President June 22, 2020 Jerome Powell, Chairman Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue NW Washington, D.C. 20551 Subject: Main Street Lending Program-Access by Nonprofit Organizations Dear Chairman Powell: On behalf of the Association of Independent California Colleges and Universities (AICCU), I am submitting the following comments regarding the Main Street Lending Program (MSLP) expansion to be accessible to nonprofit organizations, including nonprofit higher education institutions, and the proposed terms and structure. AICCU is the organizational voice for 85 nonprofit higher education institutions in California. Together, our institutions serve 380,000 students, both undergraduate and graduate. Institutions of higher education, often the largest or one of the largest employers in their local communities, are facing a major cash flow crisis in light of the reduced revenue and increased expenses due to the COVID-19 pandemic. Additionally, as institutions prepare for the safe return of students and faculty for the Fall term, they will undoubtedly face additional costs to ensure a safe learning environment which will include, among other things, sufficient PPE for students and staff, campus COVID-19 cleaning, testing and tracking tools, and efforts to de-density campus housing and learning facilities. We appreciate the Federal Reserve's effort to expand the MSLP to allow the participation by nonprofit organizations. As you seek to finalize its terms and structure, we offer the following comments to help ensure that all California nonprofit colleges and universities can access this important program: • We ask that all nonprofits colleges and universities, regardless of the number of employees, be made eligible for these loans, given the importance and direct and indirect economic impact of these institutions to their communities and regions. Further, hospital systems affiliated with universities should not be aggregated with universities for the purposes of any size cap. Both universities and their affiliated hospitals should separately be eligible to apply for funding. • We ask that the $3 billion endowment threshold be removed as a condition of eligibility. An endowment is not a single fund that can be used for any purpose like a checking or savings account. Rather, it is a collection of often thousands of gift funds designated for specific purposes ranging from endowed faculty positions to scholarships, both in the present and the future. Endowments are not accessible as rainy day funds and are ill-suited to patch emergency funding needs. • We continue to ask that student workers be exempted for the purposes of the employee threshold for eligibility. Our institutions employ student workers across campus as a part of their overall financial support to help pay for college and provide students with work experiences while keeping them close to campus for the purposes of their education. With the majority of our campuses closed for the Spring and Summer terms and have transitioned to online learning, all or most of these student

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							employees have left campuses, and therefore should not be included for the purposes of the employee threshold. • We believe the terms in the MSLP nonprofit program should reflect the unique nature of nonprofit organizations, particularly nonprofit higher education. The program should offer longer deferments and repayment terms than what is currently included in the proposed term sheet. For example, for colleges and universities, any enrollment declines at the start of the Fall term will affect our institutions for at least an additional four years as that smaller cohort advances through their degree programs. A longer repayment period (at least six to eight years), as well as a longer deferment period (two years or longer), will help to ensure nonprofits are on better financial standing to make payments on these loans. • We believe the interest rate on the MSLP nonprofit loans should be below the rate for the MSLP business loans, currently set at an adjustable rate of LIBOR plus 3 percent. Nonprofit organizations seek to serve their respective missions while remaining solvent, compared to for-profit entities which work to maximize net revenues. Rather than LIBOR plus 3 percent, we propose that the margin be set above LIBOR at a lower level, ideally at a level sufficient to cover the costs of the program without generating a net gain for the Federal Reserve. An attractive and competitive interest rate will help colleges and universities access this important program and allow our institutions to manage their higher costs, lost revenue, avoid large-scale employee furloughs, and continue to play an essential role in their communities' long-term economic recovery. It is vital to provide this access to low-interest loans to nonprofit colleges and universities financially devastated by the pandemic and struggling to continue to educate and assist students and employ faculty and staff. Thank you for the consideration and we look forward to working with you on this and other important loan programs as the Federal Reserve responds to the COVID-19 crisis.
Main Street Lending Program - NONLF and NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Blake	Brian	blakeb@pcgloanfund.org	Community Development Bankers Association	June 22, 2020 The Honorable Jerome Powell Chairman Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue N.W. Washington, D.C. 20551 Dear Chairman Powell: My organization, the Community Development Bankers Association (CDBA), is the national trade association for banks that are Community Development Financial Institutions (CDFis). We are the voice and champion of banks with a mission of serving distressed and underserved communities. Our membership is comprised of banks that are mission focused and designated by the U.S. Treasury Department as CDFIs. Our members serve distressed and disenfranchised rural communities and high poverty urban neighborhoods. In total, the US Treasury has certified 147 CDFI banks and 104 CDFI bank holding companies throughout the United States that serve distressed urban, rural, and Native American communities. We respectfully submit comments and recommendations on the proposed expansion of liquidity facilities to nonprofit entities released by the Board of Governors on June 15, 2020. We sincerely appreciate and commend the agency's leadership in responding to the COVID-induced economic crisis

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							faced by communities across our nation and beyond. We commend the agency for its willingness to step in to help financial institutions meet the credit needs of nonprofits during the crisis, as well as manage the resultant liquidity and credit risk that will undoubtedly emerge in the coming months. We believe the proposed facilities are a good start, but refinement is needed. Above all, we believe these facilities must position the smaller nonprofits that comprise the great majority of the sector and are part of America's "Main Street," for long-term recovery. Unfortunately, the current facility as proposed does not adequately consider the needs of the great majority of nonprofits. This is primarily because most nonprofits (at least 66% and perhaps as high as 90%) are too small to benefit from the program as currently proposed, or the criteria are too burdensome. Therefore, most will be excluded from the program based on some combination of the following: • Not qualifying for or not needing the minimum loan size of $250,000 • Not meeting the minimum 50 employee threshold • Not having five years of operations • Ineligibility due to the donation cap of 30% of revenue This would be a terrible shame. The largest cause/issue area for nonprofits is overwhelmingly health and human services, a category that covers cause areas such as mental health, diseases and disorders, food and nutrition, housing and shelter, and services provided for humans (low-income families, youth, immigrants, and more). 1 These are precisely those organizations most likely to respond to the needs of the low- or moderate income communities served by CDFI banks, and they are also the organizations least likely to benefit from the liquidity facilities as they are currently designed. The greatest challenge for nonprofits seeking to access this program will be size. As recently as 2017, Guidestar, a widely used information service specializing in U.S. nonprofit companies, reported that 66% of nonprofits had annual expenses of $1 million or less. Even the next largest category, representing approximately 30%, encompasses organizations with up to $5 million in expenses. 2 Therefore, over 90% of nonprofits have $5 million or less of expenses. Since most nonprofits operate at some approximation of "break-even" - a $250,000 loan representing a quarter or more of annual budget would be unjustifiable, and worse, useless. Further, these organizations are extremely unlikely to approach the 50 employee minimum threshold. A common (although not-universal) rule of thumb for grant-making foundations to evaluate nonprofits is whether the nonprofit maintains a 20/80 ratio of operating expenses/ program expenses. For a nonprofit with expenses of $1 million, (representing the highest end of the most populated category), this would leave just $200,000 for operations, including compensation. These numbers clearly demonstrate that the great majority of nonprofits are grassroots organizations relying on the inherent goodness of volunteers and employees who accept curtailed salaries to accomplish their mission. While we agree that a basic level of professionalization is required to establish a nonprofit as "bankable," the economics of operating nonprofits exclude a minimum employee number greater than five, and possibly three. Further, the requirement for a minimum of five years of operations is also unduly burdensome. Nonprofits must be nimble, and are required to respond to the quickly evolving needs of low- and moderate income communities. The five year requirement is an excessive burden that would exclude many groups that have been established to meet acute emerging needs while also demonstrating a baseline of otherwise sustainable operations. It is also a burden in comparison to similarly sized

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							small for-profit businesses, which are often able to access bank financing through SBA programs with as little as three, and sometimes two years of operations. Nonprofits should be accorded the same consideration as small business, especially in these circumstances. The proposed cap on the portion of revenues derived from donations also requires significant revision. Nonprofit revenue models vary significantly. Some sectors - such as human service nonprofits - may rely heavily on grants and donations. These organizations are critically important to meeting the needs of low-income and vulnerable populations and often experience increased service demand during economic downturns. Many of our members know how to prudently lend to nonprofits and do NOT use arbitrary caps on the source of revenue as is proposed in the Federal Reserve's Main Street term sheet. To effectively underwrite a nonprofit, a lender needs to evaluate the CONSISTENCY of every revenue source - both earned revenue and grant revenue. The historic consistency of revenue sources is the best indicator of future revenue - versus whether or not the source is a donation or a grant. A 30% cap on donation revenue would be capricious and damage a great number of nonprofits that would otherwise be able to service an appropriately structured loan. Lenders should have the discretion to underwrite nonprofits' ability to repay based on historic revenues without being hampered by an arbitrary cap on revenue type. We also strongly urge the Federal Reserve to set a fixed rate for the term of the loan at 3.5%, or, if pegging to LIBOR is essential, capping the LIBOR peg at 50 bps, plus 3% (at the time of writing 6 month LIBOR is 43 bps). During a time of economic instability, fixed rate financing is the most effective tool for nonprofits to manage uncertainty. GENERAL RECOMMENDATIONS: In summary, given the unique and acute needs of LMI communities, we strongly urge the Federal Reserve to set lower thresholds so that lenders, particularly CDFis, may better serve the nonprofit sector: • Set a minimum loan amount of $25,000 • Set a minimum employee amount at five, with a clear distinction for full-time vs. part-time (e.g. two full-time, and three part-time), with exceptions for well-established organizations with as few as three employees • Set the minimum years of operation at three • Eliminate the 30% donations revenue cap and allow lenders to underwrite based on the historic sustainability of all sources of nonprofits revenue • Fix the interest rate at 3.5% or cap it at a LIBOR pegged equivalent We thank you for the opportunity to comment. We sincerely appreciate the agency's leadership in providing tools to the financial services sector to respond to the economic crisis and to stabilize our local communities. If you have any questions or comments about this letter, please contact me directly on my cell at (202) 207-8728, or jacokesj@pcgloanfun d.org. If I am temporarily unavailable, you may also contact Brian Blake at (646) 283-7929 or blakeb@pcgloanfund.org . Sincerely, Jeannine Jacokes Chief Executive Officer
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Levinson	Ilana	ilevinson@alliance1.org	Alliance for Strong Families	comments are attached.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
						and Communities	
General Inquiry	PIO (Email from Web)	6/23/2020 12:00:00 AM	Robinson	Jim	james.robinson@chemicalbank.com	Chemical Bank	It would be helpful to understand more about the rationale of the requirement that donations cannot exceed 30% of total revenue.
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/23/2020 12:00:00 AM	Heckler	Belinda	bheckler@ymcanys.org	Alliance of New York State YMCAs	FOR YOUTH DEVELOPMENT ® FOR HEALTHY LIVING FOR SOCIAL RESPONSIBILITY RE: Comments on the "Draft for Public Consultation" - Mainstreet Lending Program for Nonprofits To Whom It May Concern: The Alliance of New York State YMCAs (the Alliance) is respectfully submitting these comments in response to Federal Reserve Board's announcement on June 15, 2020 seeking public feedback on the proposal to expand its Main Street Lending Program for nonprofit organizations. We appreciate the Federal Reserve Board for making this program available to nonprofits amidst COVID-19 and the opportunity to submit our comments. In your deliberations over the next few weeks, we ask that you consider the following concerns to improve the program and make it truly accessible to nonprofit organizations, like the YMCA. The Alliance is a nonprofit organization that represents the interests of all 37 independently incorporated YMCAs across New York State and its 135+ branches and facilities. The Alliance advocates for and educates New Yorkers on the Y's mission to promote youth development, healthy living, and social responsibility. Despite the mandated facility closures by Governor Cuomo, YMCAs across the state have continued to provide essential services for their community. For example, the YMCA has offered emergency childcare at more than 1,100 locations for families of medical personnel, essential employees, and first responders nationwide. Additionally, the Y has provided free grab-and-go meals to feed children and families who typically access USDA breakfasts and lunch at school. It is clear that communities of all sizes depend on their charitable nonprofits to a far greater degree during response and relief phases, especially COVID-19. This reliance will only grow during the economic recovery period that lies ahead. The Alliance asks that you consider the following recommendations to expand the Main Street Lending Program for nonprofit organizations: 1. Congress must act to ensure mid-sized nonprofits are eligible for loan forgiveness. Congress must ensure that mid-sized nonprofits have access to loan forgiveness. While it is a welcome development to see the Federal Reserve making its Main Street lending
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/24/2020 12:00:00 AM	Duell	Gary	Personal Email Address		The thresholds in this plan (<15,000 EEs or < $5.0 bil. revenue) exclude virtually no companies. And that hardly comprises "mainstreet" by any definition of the word. Those threshold should be 90% lower as they only exclude one out of 10,000 businesses.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/24/2020 12:00:00 AM	Strand	Kurt	kstrand@rivermuseum.com	National Mississippi River Museum & Aquarium	I work for a nonprofit and was excited to learn that this program may be extended to nonprofits. However, when I read the requirements, I noticed that the nonprofit would only be eligible if their endowment was under $3 Million. Our museum and aquarium (120 employees) will lose 2.2 Million in 2020 based on Coronavirus impact (ten week closure, lower capacity of guests upon opening, high expenses based on the need to continue to care and feed over 2,000 fish/animals. Without an opportunity for a loan like this, we will be forced to reduce staff, and our care and feeding will be difficult to sustain. I understand that we are unique to many other organizations, but museums, zoos and aquariums have suffered tremendously during the coronavirus impact, and are desperately seeking additional loans/funding. The issue we specifically face is that as an aquarium, closing for ten weeks provides us with zero revenue yet expenses are not substantially reduced (care/utilities/facilities/large essential staff). A loan like this for nonprofits would provide an ability to financially sustain ourselves until things are back to normal. Our current attendance is approximately 50% of previous years which is not enough to pay our expenses. An endowment is a benefit to nonprofits, but typically does not generate enough money from the annual payout. A 3M endowment's annual payout is approximately $135,000 (4.5% payout). Our endowment is $6 Million, and we receive approximately $270,000 from our annual payout. This does not provide the resources need to help us sustain and survive the revenue loss we will see in 2020. This Main Street Loan could be the life saver for us and other nonprofits "if" the endowment cap was removed, or put to a much higher level (at a minimum, I would recommend $10 Million. We did get PPP which allowed us to keep our full time staff on payroll for eight weeks. That has now ended, and without relief such as the Main Street Loan Program, we will need to reduce staff. Please consider removing or greatly increasing the cap. I would be happy to provide more details if needed. Thank you, Kurt Strand President and CEO National Mississippi River Museum & Aquarium Dubuque IA 52001

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program for Nonprofit Facilities - NONLF & NOELF	PIO (Letter)	6/24/2020 12:00:00 AM	DeSanctis	Christie	cdesanctis@nar.realtor	National Association of Realtors	June 21, 2020 Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue N.W. Washington D.C., 20557 RE: Main Street Lending Program - NONLF and NOELF Dear Board of Governors: On behalf of the 7.4 million members of the National Association of REALTORS® (NAR), I write to provide comments to the Board of Governors of the Federal Reserve System (Board) on its proposal to expand the Main Street Lending Program to provide access to credit for nonprofit organizations. We appreciate the Board's solicitation of comments on the expansion of the Main Street Lending Program to nonprofit organizations and hope that our comments will be used by the Board in finalizing the term sheets to make the program available to more types of nonprofit entities and to modify some of the existing minimum requirements that may prevent broad participation by nonprofits as a practical matter. NAR strongly agrees with Chairman Powell's assessment that "Nonprofit organizations are critical parts of our economy, employing millions of people, providing essential services to communities, and supporting innovation and the development of a highly skilled workforce." Many types of nonprofit organizations can play a vital role in the economic recovery following the COVID-79 crisis, but until now all nonprofits have been left out of the relief options provided to businesses. In order for them to assist in rebuilding, they need to survive the crisis themselves. As currently proposed, the term sheets for nonprofit participation in the Main Street Lending Program unduly limits the scope of the program to nonprofits that areexempt from taxation under Sections 50l(c)(3) or 50l(c)(l9) of the Internal Revenue Cod e.7 As discussed further below, we recommend the Board permit nonprofits described in Section 50l(c)(6) of the Internal Revenue Code to also participate in the program. 7 Section 507(c)(3) describes organizations such as those operated exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes. Section 507(c)(79) describes organizations of past or present members of the U.S. Armed Forces, including foundations to support these individuals. The requirements for the exemption established by section 507(c)(79) are explained in detail at 26 C.F.R §S0l(c)-79. The Federal Reserve has not publicly elaborated on why the Main Street loan programs will be limited to only these two types of nonprofit organizations. The Board should reconsider this limitation and expand applicability of the Main Street Lending Program to include Section 50l(c)(6) organizations that support business operations in the U.S., including many small businesses and independent contractors. This extension would cover nonprofit organizations such as business leagues, chambers of commerce, real-estate boards, and boards of t rad e.2 Section 50l(c)(6) organizations provide critical services to support American businesses and are vital components to the economic recovery. Under applicable IRS regulations, the primary purpose of a Section 50l(c)(6) organization must be the improvement of business conditions for one or more lines of business, and not the performance of services for in divid uals.3 In order for an organization to qualify for the tax exemption under Section 50l(c)(6), the aim of the organization must be to improve conditions of a particular trade or the interests of the community. For example, promoting higher business standards and better business methods, encouraging uniformity and cooperation, educating the public on the business product or service, or compiling useful statistical inform at io n.4 Under the current economic conditions, these organizations have taken on entirely new roles to support and promote businesses to ensure sustainability and the livelihood of workers while the challenges posed by the ongoing pandemic continue to stall overall growth and economic recovery.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Organizations qualified for a Section 50l(c)(6) exemption often provide technical assistance and marketing platforms that make it possible for businesses to operate more efficiently throughout economic cycles. They help small business owners navigate the regulatory burdens posed by federal, state, and local governments, while also promoting access to government programs, such as the Main Street program, offering financial support during unprecedented and unforeseen challenges such as the current national emergency. For example, state and local real estate associations provide critically important services for designated members (REALTORS®), residential and commercial homebuyers and sellers, and the broader real estate industry, in support of the entire real estate market. Such services include the establishment of a code of ethics and enforceable professional standards to enhance public confidence in the 7.4 million real estate professionals, who are REALTORS®, and ensure safe and timely sales transactions. Real estate associations are also a source of key industry data and statistics, highlighting trends to inform all segments of the real estate market, such as banks, other lenders, appraisers, business owners, home builders, civic planners, and federal, state, and local government officials, among others. Moreover, local real estate associations are often responsible for the establishment of local "multiple listing services" that greatly assist REALTORS® and other real estate professionals in providing comprehensives services to consumers, help create a broader and more active competitive market for real estate sales, and provide a medium through which real estate may be efficiently marketed. The establishment and maintenance of multiple listing services are a critical component of the nation's housing marketplace, and may themselves benefit from the Main Street Lending Program. These and other services performed by state and local real estate associations demonstrate the importance of these organizations, and why it is significantly important for the Main Street Lending Program to be open to these entities. As noted above, the Board has not explained its determination to omit Section 50l(c)(6) entities from the program, while allowing Section 50l(c)(l9) organizations to participate. We fully support the inclusion of veterans' organizations as potential borrowers, but believe business organizations, such as state and local real estate associations, should also be included in the program since these organizations provide services that support the housing markets that directly and indirectly impact millions of jobs. The Paycheck Protection Program ("PPP") is only available to two types of tax-exempt organizations: those described in Section 50l(c)(3) and Section 50l (c)(l 9).5 However, the Main Street Lending Program is not limited to these two categories of nonprofits, and the provisions in the PPP are not binding upon the Federal Reserve Board's Main Street program. Any concern that Section 50l(c)(6) entities may engage in political advocacy is misplaced. Section 50l(c)(3) provides that "no substantial part" of the activities of the organization may consist of "carrying on propaganda, or 2 Section 507(c)(6) includes professional football leagues. We are making no recommendation on whether such leagues should be allowed to participate in the program and note that the term sheets may exclude certain entities while allowing other Section 507(c)(6) organizations to obtain Main Street loans. 3 26 C.F.R. §507(c)(6)-7. To be exempt as a business league, an organization's activities must be devoted to improving business conditions of one or more lines of business (as distinguished from performing particular services for individual persons). It must be shown that the conditions of a particular trade or the interests of the community will be advanced. 4 https://www.irs.gov/charities-non-profits/other-non-profits/examples-of-common-business-interests. 5 CARES Act §7702. otherwise attempting to influence legislation," and the organization may not participate in any

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							political campaign for any candidate for public office. However, many organizations covered by section 507(c)(3) 6 are explicitly allowed to make lobbying expenditures, up to prescribed limits, without losing their status as a tax exempt org an izat io n.7 Thus, many section 507(c)(3) entities are allowed to engage in political activities, including educating voters, subject to caps. Therefore, limiting participation to Section 507(c)(3) entities does not preclude participating organizations from also exercising their rights to advocate for legislative positions or candidates. Furthermore, if political activity is, in fact, the basis for the Board's determination not to include Section 507(c)(6) entities, the term sheets could limit such activities to the same extent as they are limited for Section 507(c)(3) organizations. Thus, these business organizations could be eligible if they conform political spending to the caps permitted for Section 507(c)(3) charitable organizations, at least while the Main Street loan is outstanding. If the Board decides to permit access to Main Street loan programs for Section 507 (c)(6) organizations, there are other provisions in the term sheets that will need to be adjusted. The term sheets limit applicants to those tax exempt organizations with at least 50 employees. The minimum employee requirement appears to be in furtherance of the goal to provide funding to large tax-exempt organizations so that they can retain employees, and perhaps as a proxy for the size and scope of the activities of the organization. However, the number of employees is not a relevant criterion for Section 507(c)(6) organizations. These organizations typically have a smaller number of employees but provide services and assistance to a large number of member companies. The fact that a Section 507(c)(6) entity may have fewer than 50 employees does not relate to the impact this organization may have on employment. In other words, the services provided by a Section 507(c)(6) organization can directly impact the survivability of tens or hundreds of member companies, employing hundreds or thousands of individuals. The number of employees of the tax-exempt entity is simply not a good proxy for the importance of the organization in enhancing business success and thereby retaining a large number of employees. Another factor that may need to be adjusted is the requirement that 2079 revenues from donations are less than 30 percent of total 2079 revenue. It is not clear why this limitation is included in the term sheets, and more importantly, it is not clear if the term "donations" includes dues paid by member companies. Section 507(c)(6) companies are primarily funded through dues paid by member companies. If dues are considered to be voluntary donations, many Section 507(c)(6) will be excluded, notwithstanding the value they provide to our economy. Several other factors also may be problematic: (i) the organization must have a ratio of adjusted 2079 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2079 operating revenue, greater than or equal to 5 percent; (ii) the organization must have liquid assets at the time of loan origination that is sufficient to meet 90 days of usual daily expenses; and (iii) the organization must have cash and investments that exceed 65 percent of outstanding loans and available lines of credit. While these terms may be appropriate for larger organizations, many of the Section 507(c)(3) and Section 507(c)(6) organizations are smaller entities that may operate on a "break even" budget. For example, a business league may receive all dues income at the beginning of their fiscal year, and plan on spending down that income by the end of their fiscal year, receiving new revenue at the beginning of their next funding cycle. This organization will thus have more than 90 days of liquid assets until the fourth quarter of their fiscal year, but not meet the liquidity test for the final three months. However, the term sheet would prohibit this organization from obtaining a loan during the fourth quarter of their fiscal year, but not during the remainder of the year. This makes little sense, especially in the context of nonprofit entities that aredues funded. The requirements based on a minimum ratio of earnings to operating reven ue 8 and the minimum ratio of cash and investments to outstanding loans and available lines of credit may be appropriate for very large non-profit corporations and for-profit entities. But again, these have little relevance in the case of smaller business leagues that aredues-based organizations and that do not engage in commercial for-profit activities. We strongly urge that the Board consider the nature of Section 507(c)(6) organizations and make appropriate adjustments to borrower requirements to take

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							into account their business models. 6 Organizations allowed to make lobbying expenditures include educational nonprofits, agricultural organizations, hospitals and medical research fa ci lities. 7 See Section 507(h) of the Internal Revenue Code. The limits are established by regulation at 26 C.F.R. §§ S0l(h)-7 et. - 8 A footnote explains that operating revenue includes revenue from endowments in the case of charitable organizations. The definition of operating revenue for a Section 507(c)(6) organization may also have to be adjusted to consider their typical revenue sources. In conclusion, the current term sheets permitting Section 50l(c)(3) and Section 50l(c)(l9) organizations to access the Main Street lending programs should be enlarged to include Section 50l(c)(6) entities. These business organizations play a vital role in sustaining their business members, educating the public about business products and services, and providing an important support during difficult economic times. While many of these organizations are not large, their services are felt broadly, and they can assist an entire industry. In particular, state and local real estate associations provide critical services to thousands of real estate professionals, and reducing costs for millions of consumers through their services, and enhancing the overall real estate economy. According to research by the National Association of REALTORS®, every home sale generates roughly $85,000, in economic activity and every two home sales supports one job. Nationally, real estate activity accounts for nearly 20 percent of GDPand has been a driver of nearly every economic expansion of the 20th century. The support of state and local real estate associations will therefore be particularly important in the coming months, and their services will be more crucial than ever for their member businesses and the communities they serve. The importance of 50l(c)(6) organizations should not be overlooked by the Board, and to the extent they require support, they should have access to the Main Street Lending Program. In addition, the term sheets should recognize the structure of Section 50l(c)(6) entities, and modifications in required terms and conditions should be made to ensure that these organizations can participate in the loan programs as a practical matter. If you have any questions, please contact me or Vice President of Federal Policy and Industry Relations, Joe Ventrone, at 202-383-7095 or JVentrone@NAR.REALTOR. Sincerely, Vince Malta 2020 President, National Association of REALTORS®
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	6/24/2020 12:00:00 AM	Wyatt	Stuart	wyatt.stewart@iiaba.net		June 19, 2020 Board of Governors of the Federal Reserve System 20th Street & Constitution Avenue, N.W. Washington, DC 20551 Dear Federal Reserve Board of Governors: Founded in 1896, the Independent Insurance Agents & Brokers of America (IIABA or the Big "I") is the nation's oldest and largest association of independent insurance agents and brokers, representing more than 25,000 agency locations, 50 state associations and numerous city/county associations under the Trusted Choice brand. Trusted Choice independent agents offer consumers all types of insurance-property, casualty, life, health, employee benefit plans and retirement products-from a variety of insurance companies. We write to urge you to include Internal Revenue Code Section (Section) 501(c)(6) organizations,

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							such as trade and professional associations, in the Federal Reserve's Main Street Lending Program. These important organizations have not been included in the Paycheck Protection Program or similar Small Business Administration loan expansions. The Big "I" is extremely grateful the Administration and Congress took swift action to help businesses, nonprofits and millions of Americans withstand the coronavirus pandemic, which jeopardizes our collective livelihood, welfare and safety. Provisions within the Coronavirus Aid, Relief and Economic Security (CARES) Act are providing vital support to help stabilize our economy and keep Americans safe. We are especially thankful significant relief is provided to our small business members and their clients through the Paycheck Protection Program (CARES Act; Section 1102) and the employer payroll tax deferment (Section 2302), among others. The CARES Act does not, however, provide sufficient and critically needed emergency funds to trade and professional associations in desperate need of support. Section 501(c)(6) organizations can indeed access certain aid through an employee retention tax credit (Section 2301), and the Small Business Administration is accepting applications from 501(c)(6) organizations for expanded Economic Injury Disaster Loans (EIDL; Section 1110). While helpful, it will be challenging for members of our community to qualify for aid - particularly through Section 2301- and secure the funds they need to avoid financial distress and in some cases bankruptcy. Moreover, statutory language for EIDLs is unclear in exactly how it treats associations. Trade associations across the country, including the Big "I", play an important role to train America's workforce, create industry and professional standards, and disseminate essential information and resources to people in need - particularly during times of crisis. However, associations now face unprecedented financial losses from event cancellations and other programmatic losses. Without support, Section 501(c)(6) organizations will be unable to continue to provide the important services on which so many rely. According to the Professional Convention Management Association, conferences and events account for roughly 35 percent of total annual revenue for associations. And according to a recent survey conducted by the American Society of Association Executives (ASAE) Research Foundation: • 29% of respondents face $100,001-$500,000 in current and projected losses due to cancellations; • 16% face $501,000-$1,000,000 in current and projected losses; • 10% face more than $1,000,000 in current and projected losses; • 12% have partial insurance coverage for cancellations; and • 52% have zero insurance coverage for cancellations. Further, expected losses due to reduced membership and stunted programming, among other significant issues, compound this potentially catastrophic situation for associations. To help mitigate the coronavirus pandemic's devastating impact on our economy and safety, we support giving associations access to the Main Street Lending Program. The Big "I" appreciates your consideration of the above comments and your continued support of our country during this challenging time. Sincerely, Charles E. Symington, Jr. SVP, Industry, External & Government Affairs

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/24/2020 12:00:00 AM	Wynter	Nicole	nwynter@wacofoundation.org	Waco Foundation	Thank you for taking comments regarding this program. I would support the extension of benefits to nonprofit sector, greater variance in loan amounts (starting in the 5 digits), maintenance of a 5% interest rate (or lower) and an extensive repayment schedule, given the impact the pandemic is having on the nonprofit sector and their ability to fundraise now and in the coming months. These organizations are a significant employer of area residents as well as a contributor to local economic health.
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/24/2020 12:00:00 AM	Jordan	Prof Emma Coleman	jordan@law.georgetown.edu	Georgetown University	Will you Accept Comments after June 22. Mr. Rosengren's remarks in yesterday's American Banker said that the term sheet was not yet finished. I have comments about the applicability of the non-profit Main Street program for higher education/ colleges and Universities How late will you accept comments? Thank you, Professor Emma Coleman Jordan Crilley Kelley Professor of Business Law Georgetown University Law Center jordan@law.georgetown.edu
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/25/2020 12:00:00 AM	Anazco	Beatriz	banazco@goodwillmiami.org	Goodwill Industries	The below requirements should be changed to: 6. has a ratio of adjusted 2019 earnings before interest, depreciation, and amortization ("EBIDA") to unrestricted 2019 operating revenue,4 greater than or equal to 5%; This requirement should be changed to greater than or equal to 2.5%. 7. has a ratio (expressed as a number of days) of (i) liquid assets 5 at the time of the origination of the upsized tranche to (ii) average daily expenses over the previous year, equal to or greater than 90 days; This requirement should be changed to greater than 30 days.
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/26/2020 12:00:00 AM	Cole	Darren	mail@sohoplayhouse.com	SoHo Playhouse Inc.	We would like to participate in this program. Our non-profit is invaluable to the fabric of New York City and as a theatre, we are at risk since the theatre works in closed spaces. We would like to know what options are available for the non-proft as a whole as well as specific projects/programs we would like to launch that would make theatre possible even with social distancing requirements. We would like to know what kind of lending/grant program are available for the theatre in layman's terms. Also there is such a large number of applications as soon as programs like these are released. Could we be included in the first wave of applications so we could get funding as soon as possible?

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	6/30/2020 12:00:00 AM	Coleman	Chris	chriscoleman@firstrepublic.com	First Republic Bank	All comments below pertain to both the private and non-profit programs unless otherwise noted. I am not sure if the terms are locked down or still changeable, but this feedback is made in the interest of balancing safe lending while meeting the needs with firms and organizations during these times. Suggestions and Questions about the Main Street Lending Programs: Repayment: a. Back-end amortization/balloon payment: The substantial balloon payment of 70% in year five presents a high risk for the borrower and lender. Having the capacity to repay so much in one year or upon maturity is typically challenging for the business. The most common outcome is that the lender will be forced in year 5 to extend the loan over a longer timeframe or the company goes into default. b. No amortization for two years and then years 3-5 amortizing at 15%, 15%, and 70%: The program terms read as one annual payment in each year. Monthly payments totaling these amounts (e.g. the 15% in year 3) is generally more effective in ensuring repayment versus one large annual payment. We suggest you change it to equal monthly principal payments plus accrued interest equating to 15% of total principal. A more even amortization schedule will make repayment more likely, such as no principal payments for one year, then monthly amortization of principal equivalent to 15%, 25%, 25%, and 35% of the loan amount in years 2 through 5, respectively. Collateral and Priority: The Main Street Priority Loan Facility states the loan will be pari passu on collateral and repayment priority with other existing debt. This may have the effect of lenders being less likely to participate. Being pari passu is clearly beneficial for repayment to the government, but it compromises the lenders' collateral on any existing loan and increase their risk. It is very understandable to want it, but the question is whether the federal government is able to take on more risk than any individual bank, thereby assisting more borrowers. The program indicates secured or unsecured with respect to collateral. To clarify, the definition of "secured" does not need to be real property, but commonly means a UCC lien on the borrower's corporate assets. It may be worth stating this. Pass Credits: The program requires borrowers to be pass credits. This means lenders could not use it to assist those who have cash flow issues due to COVID. This will limit borrowers who are eligible for the program. Also, if a borrower is a pass credit, it could obtain the loan wholly from the bank. I suggest the program allow for Special Mention and "Sub-Standard High" loans. For easy reference, FDIC definitions are as follows: A Special Mention asset has potential weaknesses that deserve management's close attention. If left uncorrected, these potential weaknesses may result in deterioration of the repayment prospects for the asset or in the institution's credit position at some future date. Special Mention assets are not adversely classified and do not expose the institution to sufficient risk to warrant adverse classification. Loans classified 6 Substandard-High are inadequately protected by the current sound worth and paying capacity of the obligor or of the collateral pledged, if any. Loans so classified must have a well-defined weakness or weaknesses that jeopardize the liquidation of the debt. Loss potential, while existing in the aggregate amount of Substandard loans, does not have to exist in individual loans classified as Substandard. LIBOR: The programs require LIBOR as an index for the 5 year life of the loan. Given LIBOR is going away in 2021, lenders will need an alternative rate spelled out in the program and the loan agreements. We prefer Wall Street Journal Prime. We believe SOFR is not yet quite mature enough as an index. Fees: Please confirm whether the Loan Origination Fee is in addition to the Transaction Fee. If so, then the total fees paid by the borrower will be 2%, which is very high. Most commercial lending fees range from 10 to 100 basis points. Transaction Fee paid to the Fed: is it 100 bps against the total gross loan amount or 95% of the loan? Underwriting & Risk Management:

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Are lenders able to add a guarantor and ongoing financial covenants for the loan? Guarantees from owners is standard for the smaller companies; i.e. those with annual revenue less than $30 million. Financial covenants are critical for risk management. If not allowed, then the loans are more like mezzanine debt risk and should be in a second position (not pari passu) on collateral and repayment in the event of default (repayment allowed so long as not in default). There is a provision stating lenders cannot cancel or reduce of any existing debt. For a line of credit which typically has a one year maturity date and is renewable at lender discretion, are lenders able to adjust the amount up or down at maturity or opt to not renew? Technically, the verbiage appears to allow it, but if not, this may limit lender enthusiasm for the program as they would want the option to reduce their exposure if the borrower is not performing well. Professional Service Firms: As mentioned in prior conversations, the private sector programs appear to have limited use for professional service firms due to the leverage covenant using EBITDA without add back for discretionary bonuses. Most professional service firms calculate bonuses to result in nearly break even for net income. In addition, many professional service firms have distributions based on net income. It appears distributions are not allowed, so the program will have limited use for them. If the intention is oriented more toward manufacturers and wholesalers, this is less of an issue. Other Questions: Are lenders permitted to use their standard loan agreements or will there be one template the Fed requires? To maximize lender participation, I suggest the former. Are there ongoing reporting requirements from lenders to the Fed? What happens if in default? To what degree, will banks work through problem loans independently or will the Fed want to be involved? Before accelerating a loan, are lenders subject to waiting for certain events to occur such as 60 day past due? Is there a standard purchase agreement available yet for review? All of the program terms indicate the SPV will stop purchasing participations on 9/30/2020. This date will need to be extended in order for most lenders to complete due diligence and apply. It would be best if this program could have a longer life, such as 3/31/21. Non-Profit Loan Facilities: All of the items mentioned above for the private sector programs are relevant for the non-profit program. In particular, the back-loading or bullet payment in year five is going to be challenging for organizations to repay at that time. The minimum of fifty (50) employees skews the program toward the largest organizations and eliminates the vast majority of non-profits. In addition, nearly no non-profits have 15,000 employees or $5 billion in revenue. Recommendation: convert this criteria to a revenue level, such as a maximum of $50 million. The larger organizations have the financial wherewithal to sustain a recession. The need is with the smaller ones. Use of the loan facilities will be limited by the requirement that no more than 30% of revenue can be from donations. Private schools with tuition revenue and large endowments and hospitals and social service organizations with government contracts may qualify, but most organizations rely on donations and grants for more than 50% of revenue. It would be good to clarify if a grant is considered a donation. If so, the program will be applicable to a smaller set of non-profits. It will be challenging for most organizations to meet all of the financial eligibility criteria outlined. I suggest allowing borrowers to have either the Cash on Hand covenant or the liquidity/debt ratio and also suggest the 65% level on the ratio is too high and should be more like 35% (and perhaps lower for social service organizations or allow accounts receivable due with 90 days to be included in the liquidity definition). Maximum loan size of $300 million is very high. If the program is intended to assist the smaller, lower capitalized organizations, we suggest you reduce it substantially to no more than $50MM or simply eliminate the "Expanded" loan program. Larger organizations tend to

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							find financing in the bond market. The program indicates secured or unsecured. As noted above, it would be good to clarify that the definition, "secured", does not need to be real property but can mean a UCC lien on the borrower's unrestricted assets. It would be best if all references to EBIDA also state "or Net Change in Unrestricted Assets (NCUA) plus Depreciation and Interest" so as to include the non-profit accounting equivalent of EBIDA.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	7/8/2020 12:00:00 AM	Jordan	Prof. Emma	jordan@law.georgetown.edu	Georgetown University Law	Re NONLF and NOELF I. The current facilities have not been attractive to either lenders or borrowers. The NONLF and NOELF have not been attractive to either lenders or borrowers for 4 reasons. 1. Interest Rate: 3+ libor is too high.(borrowers) 2. Balloon of 70% (borrowers & lenders) 3. 5 yr. Term (borrrowers) 4. Risk retention- 5% (lenders) II.Alternative Proposal I have drafted a term sheet for an alternative facility for Higher Education, an important group of institutions in the non-profit sector, many of whom are struggling through the unexpected COVID related expenses to make schools safe for students to return in the fall. In addition, healthy Universities and colleges will be an indispensable element of recovery for Americans pushed out of opportunity during this crisis. - Best, Professor Emma Coleman Jordan The J. Crilley Kelly and Terry Curtin Kelly Professor of Business Law Georgetown University School of Law 600 New Jersey Ave NW Washington, D.C. 20001 202-662-9064

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
	PIO (Letter)	7/9/2020 12:00:00 AM	Akhter	Assad	akhterar@uhnj.org	University Hospital	June 22, 2020 Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue N.W. Washington, DC 20551 RE: Main Street Lending Program - NONLF and NOELF To the Board of Governors: On behalf of University Hospital I appreciate the opportunity to offer comments concerning the Federal Reserve's proposed expansion of its Main Street Lending Program to provide access to credit for 501(c)(3) and 501(c)(19) nonprofit organizations under the Nonprofit Organization New Loan Facility and related lending facilities (collectively, the "Facility"). In hard-hit states like New Jersey, nonprofit hospitals, like University Hospital, have been financially devastated by lost revenues and additional spending necessitated by the COVID-19 pandemic. Based in Newark, New Jersey, University Hospital was established under State statute as a "non-profit, legal entity," public teaching hospital and as an "instrumentality" of the State of New Jersey, "providing essential governmental functions necessary for the welfare and health of the State and the people of New Jersey." See, New Jersey Medical and Health Sciences Education Restructuring Act, P.L. 2012, c.45. University Hospital is a safety-net hospital and Level I Trauma Center serving the most vulnerable communities in the Newark region and the populations most impacted by the pandemic. Eligibility criteria under the Facility is presently limited to registered 501(c)(3) charitable, religious and church and 501(c)(19) veterans' and related auxiliary nonprofit organizations. As noted above, University Hospital is a nonprofit entity under State statute and, as is typical for many quasi-governmental entities, is not registered with the Internal Revenue Service as a nonprofit organization. We note for the Federal Reserve's consideration that the Internal Revenue Service has classified quasi-governmental entities such as University Hospital as falling under Section 115(1) of the Internal Revenue Code ("IRC"), and that 115(1) entities may also qualify under Section 501(c)(3) given the similarities of purpose between these designations. Under the IRC, the principal distinction between a 115(1) and a 501(c)(3) entity is the tax treatment and deductibility of donations and gifts, not necessarily the substantive activities of the entities. For example, a "charitable" 501(c)(3) organization under the IRC may be an entity whose mission is to, "provide relief to the poor, distressed or underprivileged or combating community deterioration." See, https://www.irs.gov/charities-non-profits/charitable-organizations/exempt purposes-internal-revenue-code-section-501c3. University Hospital, whether or not registered as a 501(c)(3) or 115(1) entity, is charged with, and on a daily basis, prosecutes a substantially similar m1ss1on. The published term sheet for the Facility contemplates other forms of organization for inclusion, at the discretion of the Federal Reserve. University Hospital is interested in participating in this lending opportunity to help it address urgent near term liquidity needs and to stabilize its finances while it works to reestablish operating revenues and recalibrate expenses. As an institution we take great pride in the fact that we provide care in underserved communities, which have suffered disproportionately due to the effects of this pandemic. Collectively we urge the Federal Reserve to not allow form to prevail over substance, and

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							respectfully request that the Federal Reserve exercise its discretion to allow public, nonprofit hospitals like University Hospital to be eligible to apply for this lending opportunity. University Hospital truly appreciates your consideration of this issue. If there are any questions that may arise from this letter of comment the Board should not hesitate to reach me at akhterar@uhnj.org. Sincerely, Assad Akhter Manager of Government Affairs, University Hospital

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Progam - NONLF & NOELF comments	PIO (Letter)	7/9/2020 12:00:00 AM	Cone	Jason	jcone@robinhood.org		June 22, 2020 Re: Main Street Lending Program - NONLF and NOELF Dear Chairman Powell: I am writing to you on behalf of Robin Hood, New York City's largest organization focused on lifting families out of poverty, to share comments on the terms of the Federal Reserve System Main Street Lending Program's Non profit Organization New Loan Facility (NONLF) and Non-profit Organization Expanded Loan Facility (NOELF). While we appreciate the Federal Reserve' s creation of these loan facilities as a recognition of the vital nature of the non-profit sector for the emergency response, recovery, and economic stability of the country, we are deeply concerned that the proposed eligibility requirements for non-profit borrowers will disqualify a large proportion of social service organizations from the NONLF and NOELF and those that do qualify will be forced to accept less favorable loan terms than currently offered through other government programs. Robin Hood funds more than 200 organizations across New York City that operate food pantries, homeless shelters, settlement houses, medical clinics, and other vital services for low-income New Yorkers who are being devastated by the public health and economic consequences of the COVID-19 outbreak. These are organizations that could greatly benefit from the NONLF and NOELF. However, the NONLF and NOELF borrower requirements and loan terms, as currently structured, favor hospitals and institutions of higher education with fee-for-service models over social service non-profit organizations that rely predominantly on donations and government contracts to provide services free of charge. Drawing on more than 30 years of non-profit grantmaking experience, Robin Hood requests that the Federal Reserve address the concerns and proposed changes outlined below. 1) Transform Loan Program into Grants and Forgivable Loans Non-profit boards are historically averse to taking on loans to cover day-to-day operating expenses. Yet, non-profits are experiencing the perfect storm of increased demand for their services with reduced donations. Some 50 percent of non-profits surveyedi by the Non-Profit Finance Fund reported reductions in private fundraising since the onset of the COVID-19 pandemic. Furthermore, states and municipalities are experiencing significant budgetary shortfalls leading to the reduction of government revenue streams and delays in the award or payment of contracts to non-profit social service and other organizations. Under these longer-term structural and acute conditions, grants and forgivable loans would provide the most effective injection of financial stability into the non-profit sector. We ask that the Federal Reserve review its legal authority to provide grants and/or forgivable loans and, if confirmed, that the Federal Reserve publish the analysis for the public and Congress to review. If legislative clarification is needed, we ask Congress to ensure that charitable non-profits of all sizes have access to loan forgiveness, not just those eligible for Paycheck Protection Program (PPP) loans via the CARES Act. Recommendation: The Federal Reserve, either on its own or working with Congress, must recognize the extent to which the public and the economy rely on the vital services non-profits provide to communities by creating a forgivable loan program. 2) Eliminate the Proposal to Limit Loans to Mid-Size Non-profits with Less than 30 Percent of Revenue from Donations The NONLF and NOELF requirements that organizations must have revenues from donations that are less

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							than 30 percent of 2019 revenues conflict with federal law. In order to retain tax-exempt status under Section 501(c)(3) of the Internal Revenue Code, charitable non-profits must meet a "public support" test showing they receive at least a third of their revenues via contributions from the general public, contributions or grants from other public charities, or from governmental agencies. If a charitable, non-profit fails to do so, then it carries the added burden of providing additional facts and circumstances to prove that it is a publicly supported organization. The federal government-Congress, Treasury, and the Internal Revenue Service (IRS)-currently dictates that non profits must have contributions of more than 33.3 percent, while the Federal Reserve proposes to limit loans to those that receive less than 30 percent of their revenues from donations. As a result, the draft term sheets for the two non-profit loan programs favor large institutions that generate fee-for-service revenues. These provisions threaten to eliminate a high proportion of social service organizations from eligibility for the loan facilities. Recommendation: Eliminate the requirement that no more than 30 percent of an organization's 2019 revenues come from donations. 3) Remove Organizational Size Restrictions and Eligibility Tests that May Exclude Social Service Groups and Exacerbate Racial Disparities in Access to Capital for Organizations Led by Persons of Color The term sheet for the NONLF imposes a size minimum that is not imposed in the Main Street New, Priority, or Expanded Loan Facilities for for-profit businesses. The Federal Reserve is proposing that non-profits with fewer than 50 employees should be ineligible for Main Street loans while small businesses of equal size could secure lending support. The National Council of Nonprofits, a network with more than 25,000 non-profit organizations, has noted that 97 percent of non-profits have budgets of less than $5 million annually, 92 percent operate with less than $1 million a year, and 88 percent spend less than $500,000 annually for their work. Arbitrarily excluding these vital organizations from important loan programs would cut out the vast majority of non-profits and harm the people these organizations serve. The size requirement also may exacerbate existing racial disparities in access to capital for organizations led by persons of color. A recent reportii by A Philanthropic Partnership for Black Communities (ABFE) found that 60 percent of the Black-led Organizations (BLOs) surveyed had budgets of $500,000 or less. Most had small staffs; about 82 percent had teams of 10 or fewer. In addition, the draft non-profit loan facility term sheets impose certain liquidity, asset, and reserve requirements that are not required in Main Street New Loan Facilities available to for-profit businesses. The loan facility's liquidity test requiring a minimum of 90 days of expenses on hand would have a disparate impact on social service organizations and BLOs. Non-profit organizations typically provide services with low-profit margins. Indeed, social service organizations report an average aggregate margin of 1.5 percent. According to a recent

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							reportiii by Seachange Capital Partners, the median social services non-profit has a margin of 1.0 percent, receives 3.6 percent of its revenue from philanthropy (including investment income), has total financial assets (including endowments and other assets that are subject to legal restrictions) equal to 1.9 months of expenses, and operating reserves of less than one month of expenses. Less than 20 percent of large non-profits have six months or more in operating reserves, a widely accepted standard for "financial strength" for non-profits. Social services organizations are the most fragile, with fewer than 10 percent reaching this standard. The aforementioned ABFE report also found that only 23 percent of BLOs had operating reserves of three months or more. The liquidity requirement could lead to a high proportion of social service organizations being ineligible for the non-profit loan facilities. An analysis of the loan terms for the NONLF and NOELF by Seachange found that the liquidity test alone would disqualify 74 percent of the 1,542 social service organizations studied. The Seachange analysis found these potentially high rates of loan eligibility disqualification among social service organizations with expenses over $30 million in their most recent Form 990 filed with IRS. Furthermore, according to the Seachange analysis, the earnings before interest, depreciation, and amortization (EBIDA) test alone would also eliminate 58 percent of the social service organizations from consideration. In short, the NONLF and NOELF liquidity test loan terms would potentially exclude the vast majority of mid-size social service organizations on the front lines of the COVID-19 pandemic response. Recommendation: The non-profit organization loan programs must be revised to remove the SO-employee floor. Recommendation: The five percent EBIDA requirement should be reduced to zero, if not eliminated. In addition, a statement of explanation of a deficit should be allowed so that a negative ratio does not mean automatic ineligibility for a non-profit borrower. Finally, further clarification on the calculation methodology - in the context of non-profit operating budgets - is needed in regard to both restricted funding from grants in annual operating budgets, as well as capital funds for improvements that are part of an annual operating budget. This clarification would allow noted revenues to remain in calculation to ease the restriction and not further restrict eligibility. Recommendation: We urge the Federal Reserve to eliminate the liquidity and unrestricted cash borrower requirements; loan terms 7 and 8, respectively. If this is not possible, we alternatively ask that the requirements be lessened significantly to reflect the economic realities of non-profit operations, for example by requiring only 30 days cash on hand, and bringing the loan origination ratio of 40-50 percent (down from 65 percent, as proposed). 4) Amend Loan Terms and Repayment Schedule to Support Non-Profit Stability The NONLF and NOELF loan features may be too onerous for non-profit organizations and are less favorable than those offered in other government programs. Specifically, the interest rate of LIBOR plus 300 basis points is significantly higher than that offered for Paycheck

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							Protection Program (PPP) Loans (1.0 percent) and that for Economic Injury Disaster Loans (2.75 percent). In addition, the imposition of loan origination and service fees adds to the cost under these non-profit loan facilities. Finally, the 70 percent balloon payment at the end of the five-year loan term could increase financial instability for these organizations. Non-profits with existing loans with balloon payments are usually provided an opportunity to renegotiate such loans at prevailing market rates. Recommendation: We urge that the loan terms including interest rate and balloon payments be revisited and recommend the lowest permissible rate such as the 0.5 percent rate initially proposed for PPP loans. In addition, we urge some flexibility in the balloon payment requirement to afford the opportunity for renegotiation and to stretch amortization period to a minimum of seven years. Such a change would decrease the balloon payment at the end of the loan period. Robin Hood greatly appreciates the efforts of the Federal Reserve to seek public comment on these critical matters. Thank you in advance for consideration of these recommendations for modification to the NONLF and NOELF programs. We remain available to discuss any of these issues in greater detail. Sincerely, Wes Moore CEO i"COVID019 Survey Results," Non-Profit Finance Fund https://nff.org/covid-19-survey-results#Revenue ii"The Case for Funding Black-Led Social Change Redlining by Another Name: What the Data Says to Move from Rhetoric to Action," A Philanthropic Partnership for Black Communities (ABFE) https://philanthropynetwork.org/sites/default/files/resources/BSCFN BLSCO Report Dec2019.pdf iii Seachange Capital Partners https://www.issuelab.org/resources/36677/36677.pdf iv Seachange Capital Partners http://seachangecap.org/wp-content/uploads/2020/06/MainStreet2.0-Proposal-Summary-of Tests.pdf
Main Street Lending Program - NONLF & NOELF comments	PIO (Letter)	7/9/2020 12:00:00 AM	Harwitz	Jonathan	jharwitz@liifund.org		Letter is attached. Unable to copy.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Not Responsive							

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF comments	PIO (Letter)	7/9/2020 12:00:00 AM	Stanley	Marcus	marcus@ourfinancialsecurity.org	Americans for Financial Reform Education Fund	Staff Groups: Main Street Lending Facility; Main Street Lending - Nonprofit Organization Facilities; Municipal Liquidity Facility To Whom It May Concern: The Americans for Financial Reform Education Fund ("AFR") appreciates the opportunity to comment on the Main Street Lending Facility. Members of AFR Education Fund include consumer, civil rights, investor, retiree, community, labor, faith based, and business groups.1 The Board has requested comment on the expansion of the Main Street Lending Facilities (MSLF) to make credit available to nonprofit organizations through the program. The proposed expansion would make available new loans of between $250,000 and $35 million (or one quarter of 2019 revenue) and expanded loans of between $10 million and $300 million (or one quarter of 2019 revenue) to tax-exempt non-profit organizations with between 50 and 15,000 employees. The price and terms of loans are very similar to those already being offered to private businesses through the MSLF. We support the expansion of the MSLF to support nonprofit organizations. However, our purpose in writing this letter is to urge the Board to also expand MSLF assistance to municipal and government entities not currently being served by the Municipal Liquidity Facility (MLF). As you know, direct eligibility for the MLF is currently limited to entities that are states, counties with at least 500,000 residents, cities with at least 250,000 residents, or a small number of other large cities, counties, or Revenue Bond Issuers designated by state governors. This is only a small fraction of the total number of local government entities that may have credit needs. Even if direct MLF eligibility was expanded, many smaller cities, towns, school districts, and public entities such as hospitals would not have direct access to the MLF program. Bank lending to municipal entities has expanded rapidly over the past decade and now constitutes a substantial share of all municipal credit outstanding.2 Many smaller municipal entities would be well positioned to take out a bank loan financed by the Main Street facility. It is true that larger borrowers such as state governments can borrow from the MLF on behalf of smaller jurisdictions within their state. However, this would involve the intermediary borrower assuming the credit risk of the final borrower. At a time of unprecedented fiscal stress in states and localities it is unlikely that many states or other intermediary borrowers will wish to assume this risk. Further, there can be substantial political complexities for states in making choices about on-lending to smaller borrowers. We believe that the MSLF could be very beneficial to smaller municipal borrowers. Not only would it be available to a far greater range of municipal borrowers, MSLF credit from banks is being offered at more attractive terms than direct Federal Reserve credit from the Municipal Lending Facility. MSLF credit extends for a term of five years, while MLF credit is being offered for only three years. MSLF credit is being offered at a spread of 300 basis points over short-term LIBOR, while MLF credit is being offered at spreads of 150 to 590 basis points over the benchmark rate, which would be higher in many cases.3 Being able to negotiate the structure of the loan with a bank might also allow more legal flexibility for borrowing under local laws. Chairman Powell's stated justification for expanding the MSLF to nonprofit entities is that "Nonprofit organizations are critical parts of our economy, employing millions of people, providing essential services to communities, and supporting innovation ....Nonprofits provide vital services across the country and we are working to help them through this difficult time." All the elements of this justification apply equally to smaller municipal government entities. There are many similarities between non-profit and smaller government entities, in that both types of entities do not operate for profit and are structured to perform public service needs. In many

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							cases nonprofit entities are financed by grants from public entities, meaning that expanding the MSLF to government entities would also help to support non-profits. In sum, we urge you to expand the MSLF beyond non-profits to support bank loans to smaller municipal entities which are unable to take advantage of the Municipal Liquidity Facility. Thank you for your attention to this issue. Should you have questions, please contact AFR's Policy Director, Marcus Stanley, at marcus@ ourfinancialsecurity.org. Sincerely, Americans for Financial Reform Education Fund 1 A list of coalition members is available at: http://ourfinancialsecurity.org/about/our-coalition/ 2 Ivanov, Ivan and Tom Zimmerman, "The Privatization of Municipal Debt", Brookings Institution Hutchins Center Working Paper #45, September, 2018, available at https://www.brookings.edu/wp-content/uploads/2018/08/WP45.pdf 3 We do not agree with the highly restrictive terms of MLF credit, and see no justification for MLF lending on such inferior terms to the MSLF, but simply note it here.

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Main Street Lending Program - NONLF & NOELF	PIO (Letter)	7/9/2020 12:00:00 AM	Beane	Catherine	cbeane@ywca.org	YWCA	Comments of YWCA USA regarding the proposed Mainstreet Lending Program for Nonprofit organizations - NONLF and NOELF Submitted to the Federal Reserved Board of Governors June 22, 2020 YWCA USA appreciates the opportunity to submit the following comments regarding the Federal Reserve's proposed Nonprofit Organization Loan programs - the Nonprofit Organization New Loan Facility (NONLF) and the Nonprofit Organization Extended Loan Facility (NOELF). Founded more than 160 years ago, YWCA is one of the oldest and largest women's organizations in the United States and is dedicated to eliminating racism, empowering women and promoting peace, justice, freedom and dignity for all. Today, we serve over 2 million women, girls, and their families through a network of more than 200 local YWCA associations in over 1,300 communities across 46 states and the District of Columbia. We provide programming and advocacy to generate institutional change in the areas of racial justice and civil rights, empowerment and economic advancement of women and girls, and health and safety of women and girls. In this critical time, nonprofits like YWCA have stepped up to meet the unprecedented level of need in our country due to the COVID-19 pandemic. Even though we face many of the same economic challenges as other industries, YWCA and other nonprofits are not shutting down. Rather, we are straining to meet increasing demands in our communities on the frontlines, providing shelter and services for survivors of domestic and sexual violence, child care for first responders and other essential workers, housing and job training for low income women, and countless other services that meet local needs and keep our communities connected. We are playing an integral role in community response to the COVID-19 crisis, and we will continue to be integral to our nation's recovery. With these factors in mind, YWCA respectfully requests the Federal Reserve to address the concerns and proposed changes outlined below, which pose significant barriers to YWCAs' ability to access financial relief through the Mainstreet Lending Program. 1. Limitation of SO-Employee Minimum Should Be Removed The term sheet for the proposed nonprofit loan facility imposes a size minimum that is not imposed in the Main Street New, Priority , or Expanded Loan Facilities for for-profit businesses. There is no explanation why the Federal Reserve is proposing that nonprofits with fewer than 50 employees should not be eligible for Main Street loans for which their small business counterparts of equal size could secure lending support. YWCA USA and many of the local YWCAs across our national network that are on the frontlines of this pandemic employ fewer than 50 employees. Even as we face immediate and growing financial needs, YWCAs will be arbitrarily excluded from this important loan program. Recommendation: The SO-employee floor should be removed. 2. Minimum loan amount of $250,000 is too high Across the nonprofit sector, 66.3 percent of nonprofit organizations have annual budgets of less than $1 million . The proposed minimum loan amount represents a quarter or more of their annual budget. This amount is too high and many nonprofits will not be able to meet this loan threshold. Recommendation: Decrease the minimum loan amount to $100,000. 3. "Reasonable Efforts" Regarding Employee Retention Require Further Clarification

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
							The description of "Retaining Employees" in the draft term sheet requires refinement if the Federal Reserve expects nonprofits to take advantage of this facility. We endorse the analysis of the National Council of Nonprofits on the issue of employee retention, and recommend the following: Recommendation: "Reasonable efforts" should be interpreted in the totality of the circumstances, taking into consideration not only the general economic environment in the community or communities in with the borrower operates, but also factors such as workforce, fundraising ability, revenue-generating activities, and overall demand for the services and programs the organization provides. One option would be to add the qualifier "mission-based" before "reasonable efforts." Recommendation: The terms "maintain its payroll" and "retain its employees" are vague and need further refinement. We ask the Federal Reserve to make clear that nonprofits participating in the Main Street loan program generally should endeavor to pay staff at the same or increased income levels and should act in good faith to keep staffing levels (measured on the basis of full-time equivalents) at the same or increased levels, both for the duration of the loan. It is also important that the loan documents expressly state that the employee retention provision begins on the date that loan funding is received by the borrower rather than at an earlier date. Recommendation: We ask that the Federal Reserve adopt safe harbors of other loan programs and state clearly that nonprofit borrowers will not be penalized under the employee retention provision for the decision of employees to decline offers of rehire, or for those who are fired for cause, voluntarily resign, or voluntarily request a reduced schedule during the time that the loan is outstanding. 4. Additional Recommendations and Requests for Clarification YWCA USA respectfully requests the Federal Reserve clarify the following issues in its final expansion notice: • Endowment: What resources should be included in endowment calculations? Does it include restricted endowments? Does it extend to include cash on hand? • Collateral: Flexibility on collateral is requested. The loan should be able to be approved with no more than 50% Loan to Value (LTV) if collateral is needed. • Other Debts: The proposal requires that borrowers, "refrain from repaying the principal balance of, or paying any interest on, any debt until the Eligible Loan is repaid in full, unless the debt or interest payment is mandatory and due." We request that this exclude lines of credit and other debt that are assumed to provide financial liquidity related to the impact of COVID-19. Thank you for your consideration of these comments and recommendations. Please do not hesitate to reach out if we can provide additional information or insights as you undertake this review process. Sincerely, Alejandra Y. Castillo CEO, YWCA USA

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Not Responsive							

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Not Responsive							

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Not Responsive							
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	7/9/2020 12:00:00 AM	Lasher	David	Lasher@nyddc.com	Diamond Dealers Club	To whom it may concern: We are a non-profit (501c6) that has existed since 1931. We are the largest trade organisation of diamond manufacturers, wholesalers, and dealers in the United States. As we are based in New York, our business, and the businesses of our members, have been severely impacted by Covid-19. We believe that this is a temporary situation and we will return to financial health after this crisis passes. We desperately need the assistance that this loan would offer us. However, we do not meet the threshold or having at least 50 employees. We hope that you remove that requirement as in all other ways we would qualify for the loan. We are a vital organization in our sector, and believe that there are many other organizations that are essential to the fabric of their trades and the economy at large that are excluded if these loans are only available to non-profits with 50 or more employees. Thank you for your consideration. David Lasher Managing Director, DDC
Not Responsive							

Event Title / Description	Ticket Type	Received Date	Last Name	First Name	Email Address	Affiliation	Comment
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	7/14/2020 12:00:00 AM	ROBINSON	TIFFANI	Personal Email Address		I'd like more information, regarding Main street Lending Program for Nonprofit organizations. Thank you so much.
Staff Group - Main Street Lending Program - Nonprofit Organization Facilities	PIO (Email from Web)	7/21/2020 12:00:00 AM	Strand	Kurt	kstrand@rivermuseum.com	National Mississippi River Museum & Aquarium	I appreciate the Main Street Lending Program being extended to nonprofit organizations. I believe you should change the requirement that the endowment cannot be greater than $3,000,000 to be eligible for this program. Our endowment is in the $7,000,000 range but most of those dollars are restricted, our unrestricted endowment is approx $2,400,000. If you made the change to "unrestricted endowment under $3,000,000", it would still meet the intent of the program, but open it up to those who are not able to use the restricted funds for operating, etc.