

Q&A: Payroll Support Program Compliance Obligations Updated July 19, 2020

GENERAL DATA COLLECTION QUESTIONS

1. When is the first PSP quarterly report due, and how do I submit it?

Under the PSP Agreement entered into by every Payroll Support Program participant, the recipient must file compliance reports with Treasury on a quarterly basis. Recipients with a PSP Agreement dated June 30, 2020 or earlier must file their first quarterly report by August 14, 2020. Recipients must submit their report through Treasury's CARES Administration Hub (CARES Hub). The CARES Hub can be accessed at <https://portal.treasury.gov/cares>. Access to the CARES Hub will become available on July 19, 2020. For further information about reporting deadlines, see "Q&A: Payroll Support Program Compliance Obligations Updated June 30, 2020," available at <https://home.treasury.gov/system/files/136/4112-Compliance-FAQs.pdf>.

2. What information do I need to provide in the quarterly PSP report?

The PSP Agreement details the types of information recipients must provide in their quarterly reports to Treasury. The CARES Hub covers the reporting requirements in four mandatory sections: (1) Headcount and Compensation Information; (2) High-Income Employees and Corporate Officers of the Recipient and Its Affiliates; (3) Upload Documents; and (4) Certification. Each of these sections is described below. The CARES Hub also contains an optional section that allows a recipient to upload additional documents or information.

Failure to provide timely and accurate information may result in Treasury finding a Recipient to be in violation of the PSP Agreement.

The CARES Hub allows a user to save data as the user adds information to the quarterly report. The sections do not need to be completed in sequential order. When the report is complete and accurate, the user can submit it to Treasury.

A. Headcount and Compensation Information

This section primarily enables data entry, with a document upload feature for Recipients to provide additional information. Recipients will manually enter data related to changes in Employee headcount, Salaries, Wages, and Benefits paid; use of PSP fund; and reductions to Salaries, Wages, and Benefits. If a Recipient reports changes to Employee headcount, Salaries, Wages, or Benefits paid, the Recipient is required to also upload a document providing a more detailed explanation and reasons for the change.

B. High-Income Employees and Corporate Officers of the Recipient and Its Affiliates

This section requires the Recipient to enter the number of Employees whose total compensation is subject to restriction under the PSP Agreement. Recipients must also, on an annual basis, provide the number of employees that received either Total Compensation or Severance Pay and Other Benefits in excess of the restrictions imposed by the PSP Agreement.

Q&A: Payroll Support Program Compliance Obligations Updated July 19, 2020

C. Upload Documents

Pursuant to the PSP Agreement, recipients must provide Treasury with documents including financial statements and IRS Form 941. Recipients can upload these documents or provide a link to financial reports that are filed in the SEC's Electronic Data Gathering, Analysis, and Retrieval system (EDGAR).

D. Certification

In this section, recipients certify their ongoing compliance with the terms and conditions of the PSP Agreement, maintenance of effective internal controls related to compliance with PSP Agreement, and the veracity and accuracy of any data, documents, or information provided to Treasury. The certification must be signed by an authorized representative of the signatory entity (the air carrier or contractor that executed the PSP Agreement). The certifications can be signed online by an authorized representative, or a signed copy can be uploaded.

Important Information: If the Recipient provides any information in its compliance report that it customarily keeps private or closely held, please identify the information on a PDF and upload in the CARES Hub.