

May 27, 2020

Dear Representatives Roy and Phillips:

On behalf of our collective organizations we would like to extend our gratitude and support for H.R. 6886, the Paycheck Protection Program Flexibility Act. This bill would provide flexibility for Paycheck Protection Program (PPP) loans, and our organizations feel this would be beneficial to our members that have already received these loans and for future borrowers.

According to the most recent data from the Health Policy Institute, only about 30% of dental practices have reopened and on average are seeing only 28% of the patients they were treating pre-pandemic.¹ Given the fact that most dental practices are small businesses, access to small business loan programs through the Small Business Administration (SBA) are a lifeline for our practice owners and their staff. Although many of our members have taken advantage of PPP loans, the lack of flexibility for these loans left many of our members uncertain about how to use the funds so that they could maintain their businesses but still receive full loan forgiveness. Many of our members applied for and received funds before they were even able to open due to state or local restrictions on non-emergency procedures.

As such, our collective organizations have asked both federal agencies and Congress to make changes to the PPP loan program. H.R. 6886 addresses many of these changes, including additional time for the forgiveness period beyond the current 8 week limitation and flexibility on the 75/25 payroll vs. operating costs that the Department of the Treasury and the SBA determined in their rule making. Our organizations also support other provisions in the bill, including deferral of payroll tax and protections for employers that make good faith efforts to rehire employees.

There are some additional provisions that our organizations urge you to include either as amendments to H.R. 6886 or in future legislation. Primarily, we would support the addition of a tax credit or grant for businesses that received PPP loans early in the process and have made every effort to follow the rules—even without full guidance from the agencies—to achieve full loan forgiveness for their PPP loans. Many dental offices hired their employees back even before they were allowed to reopen in order to comply with the intent of the CARES Act and the PPP loan program. Those entities should be given additional compensation since they will likely not be able to take full advantage of the flexibility. Further, the ADA and other stakeholders will continue to advocate for allowing 501(c)(6)s to apply for PPP loans or other small business loan programs, and to allow PPP funds to be used to pay for the additional personal protective equipment (PPE) that dental offices now require to protect dentists, their employees and their patients.

Again, we thank you for introducing the Paycheck Protection Program Flexibility Act. We are supportive of the legislation and urge you to consider the additional flexibility we have highlighted in order to ensure that PPP loans provide the best possible support for non-profits, dental practices and all small businesses nationwide. If you have questions, please reach out to Megan Mortimer from the American Dental Association at mortimerm@ada.org.

Sincerely,

American Dental Association
Academy of General Dentistry
American Association of Endodontists
American Academy of Dental Group Practice
American Academy of Oral and Maxillofacial Pathology
American Academy of Oral and Maxillofacial Radiology
American Academy of Pediatric Dentistry
American Academy of Periodontology

¹ [“COVID-19: Economic Impact on Dental Practices.”](#) Health Policy Institute. American Dental Association May 2020.

American Association of Oral and Maxillofacial Surgeons
American Association for Dental Research
American Association of Orthodontists
American College of Prosthodontists
American Society of Dentist Anesthesiologists
American Student Dental Association
National Dental Association