



April 29, 2020

Ms. Jovita Carranza, Administrator
U.S. Small Business Administration
409 3rd St., SW
Washington, DC 20416

DELIVERED VIA EMAIL TO IGA@SBA.GOV

Dear Administrator Carranza:

On behalf of the National Volunteer Fire Council (NVFC), the leading national nonprofit association representing the interests of the nation's volunteer fire, EMS, and rescue services, I am writing to ask you to address several challenges that non-profit emergency services organizations face accessing assistance through the Economic Injury Disaster Loan (EIDL) program, which was funded as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136). I am also enclosing a letter that I sent to President Trump today outlining some of these same concerns and asking for his assistance.

Non-profit fire, EMS, and rescue organizations are the primary providers of emergency services in thousands of communities across the nation. These organizations, which are typically staffed by volunteer personnel, rely on private fundraising to pay for emergency operations as well as equipment and vehicle replacement. Much of this fundraising is done by hosting events, including community meals, carnivals, bingo, raffles, and/or hall rentals. Unfortunately, due to social distancing most of these events have had to be cancelled since mid-March, resulting in significant revenue losses for hundreds if not thousands of emergency services organizations.

We have been heard from constituents in non-profit fire and EMS departments that were having difficulty applying for assistance through the EIDL program before appropriated funds ran out. EIDL applicants were required to verify that no more than 33 percent of their organization's gross revenue comes from legal gambling activities. Many non-profit emergency services organizations rely on raffles and/or bingo to raise money. These activities often account for a high percentage of gross revenue even though most the funds raised are returned to participants in the form of prizes. Additionally, the way that the application is set up is confusing for some emergency services organizations. Parts of the application seem to assume that non-profits applying for assistance are faith-based organizations, and there is no "fire" or "emergency services" business activity option for applicants to choose from.

Going forward, we ask that you modify the EIDL application in the following ways:

- Exempt emergency services organizations from 13 CFR 123.301(e), which limits eligibility to apply for an economic injury disaster loan to organizations that derive no more than one-third of their gross revenue from legal gambling activities

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- Add “emergency services” as a business activity answer choice
- Develop a FAQ document specifically targeted at prospective applicants that are emergency services organizations, similar to the one that was developed for faith-based organizations

I would like to schedule a time to discuss these issues with you in greater detail via web conference. Given the scope of the challenges facing our nation at this time, unprecedented in modern times, it is more important than ever that we work together. The NVFC stands ready and willing to work with you to ensure that volunteer emergency services organizations are able to apply for and receive assistance through the EIDL program.

Sincerely,

A handwritten signature in black ink that reads "Steven W. Hirsch". The signature is written in a cursive style with a large initial 'S'.

Steven W. Hirsch, Chair
National Volunteer Fire Council