



# ALASKA BLACK CAUCUS

March 14, 2023

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Celeste Hodge Growden

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**President Emeritus**  
Louie Overstreet, Ph.D., P.E.

*Authentic  
Bold  
Committed*

██████████ OCC Examiner-in-Charge  
National Bank Examiners  
127 Public Square  
Mail Code: OH-01-27-0554  
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

The Alaska Black Caucus (ABC) is pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The Alaska Black Caucus (ABC) is a Black-led organization whose mission is to assert the Constitutional Rights of Alaska's Black community. We have served this mission since our founding in 1975. In 2019, the ABC reincorporated as a 501(c)(3) to focus on racial equity. In the last three years, we have substantially increased our membership; identified four major focus areas (economics, education, justice, and health); and organized an affiliate, Allies for Change, a coalition of BIPOC and other advocates supporting ABC's mission by centering and elevating Black voices and the needs of the Black community and pushing for meaningful local policy change. The ABC has grown its support, influence, and membership, with a strengthened focus on the urgent work to achieve racial justice.

KeyBank has been an engaged partner and has supported the Alaska Black to champion the lives of Black people and other people of color. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. From 2019 to 2021, KeyBank has worked with us to help meet the needs of our community by providing philanthropic support. With Key's financial support, the ABC was able to cross the finish line and purchase a building we're appropriately naming "The Equity Center," intended as a service hub for the Black, Indigenous, and other People of Color (BIPOC) community. Based in downtown Anchorage, the Equity Center will provide office space (at below market rent) for BIPOC-led organizations and businesses, a commercial kitchen and meeting space to address equity concerns in our focus areas.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and is helping us build supportive ecosystems for Black-owned businesses that will help close the racial wealth cap by addressing "challenges of access—to capital, expertise, and services." A key aspect of ABC's new Equity Center is leveraging investment in BIPOC communities through our business incubator that sits at the crossroads of under-resourced BIPOC neighborhoods. This incubator will not only provide coworking space and a shared commercial commissary kitchen to the businesses without them, but also leverages ABC's relationships with other partners and organizations that are committed to addressing the needs of BIPOC communities.

**We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.** If you have questions, please contact me at (907) 229-4228 or email me at [theAlaskaBlackCaucus@gmail.com](mailto:theAlaskaBlackCaucus@gmail.com).

Sincerely,

Celeste Hodge Growden  
President/CEO

March 14, 2023

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National Bank Examiners  
127 Public Square  
Mail Code: OH-01-27-0554  
Cleveland, OH 44114-1306

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Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

The University of Alaska Anchorage's (UAA) College of Business and Public Policy (CBPP) prepares students for leadership at the frontiers of a changing world. We help diverse and growing communities in Alaska and elsewhere meet their challenges by delivering the highest quality in open-access, business and public policy education.

KeyBank has been an engaged partner and has supported UAA to provide students with financial need the opportunity to prepare for careers in the financial services industry through financial support. In addition, KeyBank established a scholarship for the Alaska Native Business Management minor, which prepares business professionals educated in the culture and management of Alaska Native Corporations. These students will encounter working with an Alaska Native Corporation, created by the Alaska Native Claims Settlement Act (ANCSA) of 1971 or an Alaska Native non-profit or tribe, affected by ANCSA. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by supporting two scholarships at CBPP. With KeyBank's support, we awarded 12 students a total of \$30,250 during this timeframe. Additionally, KeyBank's ██████████ serves as a member on CBPP's advisory board.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to educate students to become leading contributors to Alaska's workforce.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions, please contact me at 907.301.6360 or email me at [jamartinez@alaska.edu](mailto:jamartinez@alaska.edu).

Sincerely yours,

Julia Martinez  
Senior Development Officer | College of Business & Public Policy