

March 1, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

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 WorkPlace serves as the workforce development board for Southwestern Connecticut, helping prepare people for careers and strengthening the workforce for employers. Our many programs and partnerships — including job training, career services, and employment — have made a difference in the lives of thousands. We have been an advocate and community partner, working to address the region's present and future workforce issues.

The WorkPlace is responsible for more than 30 programs. All programs are designed to help specific populations overcome barriers to employment, providing opportunities for all to succeed in the workforce and enable participants to develop stronger financial futures. Additionally, The WorkPlace operates four Connecticut American Job Centers in Bridgeport, Derby, Ansonia, and Stamford. American Job Centers (AJC) provide critical no-cost workforce services to unemployed and underemployed individuals, including workforce preparation workshops, access to job training, and supportive services.

Some of the specific needs The WorkPlace is working to address include: promoting the economic independence of women; helping people facing foreclosure remain in their homes, advancing apprenticeship opportunities in manufacturing, healthcare and other sectors; helping young adults become valuable and self-reliant members of the community; providing appropriate supports for the re-entry population to gain a fresh start in their communities; helping low-wage, mature workers return to the job market, and working to end homelessness among our veteran population.

KeyBank has been an engaged partner and has supported The WorkPlace to develop a well-educated, well-trained, and self-sufficient workforce that can confidently compete in today's changing global marketplace. Essential to our mission is the creation of a seamless, coordinated system of education, training, and employment. The support of KeyBank in this effort demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy and strategic investments.

From 2019 to 2021, KeyBank worked with us to meet the needs of our community. KeyBank provided financial support for the maintenance and operation of our Mobile Career Coach, a career center on wheels and mobile classroom that delivers career services and training opportunities traditionally available at the American Job Center to low-wage workers and job seekers unable to get to a career center. The self-contained 38-foot mobile classroom is equipped with state-of-the-art telecommunications equipment to assist job seekers with resume preparation, job and employer research, and job readiness skills. The Coach improves service effectiveness, capacity, safety, and accessibility to underserved and/or hard-to-reach areas that are not on a bus line, and where it is not economically feasible for an office. It brings AJC services to individuals at community centers, faith-based organizations, housing projects, and other areas.

Additionally, during the pandemic, KeyBank supported The WorkPlace's Dress for Success Mid-Fairfield County program to deliver custom packages of professional attire, personal protective equipment, and other COVID-related

information, to help low-income women find work, provide them with COVID supplies and information, and refer them to supportive resources.

This financial support was essential to continue service delivery as we had been unable to hold in-person meetings with clients at our boutique or offices. The pandemic limited the program's ability to customize attire, help prepare clients for opportunities, and assist them in building their confidence. The support of KeyBank helped low-income women find work, and receive valuable supplies and information at a time of great need.

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 enhance economic vitality through job creation, attainment, retention, and workforce development programming focused on equipping adults with the necessary skills, education, and capabilities to meet current and future local employment demands.

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 (203) 610-8502 or email me at jcarbone@workplace.org.

Joseph Carbone

A handwritten signature in black ink, appearing to read 'Joseph Carbone', with a long horizontal flourish extending to the right.

President and CEO



Getting Help...Getting Better...Giving Back.

March 2, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

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.

Chrysalis Center helps those living in poverty, veterans, women and children, young adults, and individuals who are struggling with mental health, addiction, HIV/AIDS, homelessness, and those returning from incarceration. Through job training, housing, and other community healthcare services, Chrysalis Center helps individuals transform their lives by "Getting help... Getting better... and Giving Back." Chrysalis Center offers a continuum of services in four core areas: Housing, Recovery, Community Support, and Food.

KeyBank has been an engaged partner and has supported Chrysalis Center to provide supportive services to assist people in need to transform their lives. 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 generously funding Chrysalis Center's Community Supportive Housing initiative in the amount of \$5,000 in November 2020.

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 serve over 500 individuals and families involved in our Community Supportive Housing programs. These programs provide links to community supports and resources to help individuals and families navigate challenges such as education, physical and mental healthcare, daily living skills, entitlement benefits, and links to other community resources such as houses of worship and support groups.

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 860.263.4412 or email me at scastelli@chrysaliscenterct.org.

Sincerely,

Sharon L. Castelli
Chief Executive Officer



10th March 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

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.

Covenant Preparatory School a tuition-free, privately funded, private middle school for boys in Hartford, solely relies on the support of the local community, organizations, volunteers and tutors who are committed to seeing our students thrive.

KeyBank has been an engaged partner and supported Covenant Preparatory School since June 2018 to ensure that we uphold our mission in educating boys from underserved neighborhoods in and surrounding the Hartford area. They share our core believe that rigorous preparations at this age, changes the trajectory of left behind communities (particularly black and brown boys) we serve. This support shown by KeyBank, demonstrates its commitment to serving low- and moderate-income neighborhoods through meticulous philanthropy within our community.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our school community by providing us with aid on our COVID-19 Support Initiative. The \$5,000, unrestricted supplement (11/24/2020) helped us to ensure that we could put in place a food program; provide home education kits for remote learning; supply masks, hand sanitizer, disinfected wipes; and transportation where a hybrid learning system was in place.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Their partnership and engagement have allowed us to be responsive to community needs and helped us to ensure that during a very difficult time, during Covid-19, that we could continue to educate our boys regardless.

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

If you have any questions, please contact me at 475-254-1336 or email me at fpetersen@covenantprep.org.

Best wishes,

Fabian Pietersen

Head of School for Covenant Preparatory School



March 3, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

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Dear Mr. Poszywak:

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.

HEDCO, Inc. as an economic development corporation, works to support small business capacity building, neighborhood revitalization, financial education/inclusion, CDFI lending and investments, products for unbanked/underbanked communities.

KeyBank has been an engaged partner and has supported **HEDCO, Inc.** to provides its small business clientele with business support needs that would be otherwise un-met or under-served. HEDCO fosters the community relationships crucial to sustained and broad-based economic growth and to provide small businesses throughout the region with alternative financing. HEDCO hires, retains, and develops an experienced, professional staff, who individually understand client and local market needs and collectively provide successful development outcomes.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by **providing** financial support to allow HEDCO to provide small grants for women/minority owned businesses who needed technology upgrades to remain competitive in their respective markets.

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 **provide 19 businesses with new technology, social media and marketing support.**

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 860-527-1301 or email me at kimh@hedcoinc.com.

Kim Hawkins
President/CEO

HEDCO, Inc.
207 Main Street
4th Floor
Hartford, CT 06106
P: (860) 527-1301
F: (860) 727-9224

Business Resource Center
207 Main Street
3rd Floor
Hartford, CT 06106
P: (860) 527-1100
F: (860) 527-1102

hedcoinc.com



March 6, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Dear Mr. Poszywak:

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 Village for Families & Children is one of the largest and most comprehensive behavioral health service providers in Connecticut and has been assisting families since 1809. The Village is a lifeline for our communities' most vulnerable residents, and we continue to meet existing and emerging needs in our region. We provide family support services to approximately 20,000 people each year (over 10,000 through direct social services plus 5,000-10,000 through VITA). Our organization helps children with behavioral or mental health needs, children who have been removed from their homes (or risk being removed) due to abuse or neglect, adults facing mental illness and substance use disorders, and families struggling with poverty and its devastating effects.

KeyBank has been an engaged partner and has supported The Village in our mission to build strong, healthy families who protect and nurture children. This support demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. From 2019 to 2021, KeyBank worked with us to meet the needs of our community by supporting us with generous grants and sponsorships including:

- 2019 – Girl Within Event \$1,500 Patron Table Sponsorship; \$2,500 grant to support our VITA program (volunteer income tax assistance program).
- 2020 – \$5,000 grant for general operations; \$1,000 Girl Within Table purchase; \$2,500 grant for our Holiday Giving Tree Program
- 2021 – \$5,000 Silver Sponsorship for Girl Within Event.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership has allowed us to be responsive to community needs and helped us in our work to make a difference in the lives that we serve throughout Greater Hartford and beyond. Stories of impact can be viewed on our website through this link: <https://thevillage.org/stories-of-impact/>. The Village is committed to serving those most vulnerable whether they can pay for services or not. We do not turn anyone away.

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 860-297- 0545 or email me at sadanti@thevillage.org.

Sarah Adanti
Senior Director of Development



Urban League of
Greater Hartford

Empowering Communities.
Changing Lives.

March 3, 2023

Stanley Poszywak, OCC Examiner-in-Charge
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Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

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.

Urban League of Greater Hartford is an affiliate of the National Urban League with a mission to promote racial equity through economic empowerment, offering programs and services in education, employment, housing, health and social justice. More specifically, our youth development helps high school students get ready for college, work and life. Adult education prepares individuals ages 17 and older for the General Education Diploma. Workforce development provides readiness, licensing, certification and training to help recruit, hire, retain, and promote a diverse workforce. We provide first-time homebuyers with training, financial literacy, and credit repair, and offer eviction and foreclosure prevention assistance.

From 2019 to 2021, KeyBank has been an engaged partner to the Urban League Movement, supporting our Financial Opportunity Center to help youth and young adults with a comprehensive approach to supporting economic enrichment. A KeyBank senior manager also served as an officer on our Board of Directors as the Treasurer to help oversee the financial viability of the agency. This support demonstrates its commitment to impacting historically economically marginalized communities, including low- and-moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

KeyBank's commitment and actions to serve the needs of our most distressed communities are clear and we look forward to continuing our partnership.

If you have questions, please contact me at 860.541.1719 or email me at dhopkins@ulgh.org.

Sincerely,

David J. Hopkins
President and Chief Executive Officer

March 10, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
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Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

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 mission of Boys & Girls Clubs of Greater New Haven is to enable all young people, especially those who need us most, to reach their full potential as productive, caring, responsible citizens. We provide an outcome-driven Club experience that helps young people achieve academic success, develop good character and citizenship, and pursue healthy lifestyles. In the 2021-22 academic year and 2022 summer session, we served 1,380 total Club Kids in New Haven, North Haven, and Wallingford. As the area's leading out-of-school youth development organization in south central Connecticut, we provide excellent programs and services to children and families in our communities, and with the support and investment of partners like KeyBank, we will continue to improve and expand our impact and reach.

We are pleased to share that a KeyBank employee has supported Boys & Girls Clubs of Greater New Haven by engaging as an active board member and volunteer. The support of this individual demonstrates his and KeyBank's 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 providing a \$5,000 grant from the KeyBank Foundation in 2019 in support of our New Haven Clubhouse and matching contributions by the employee who serves on our board. KeyBank's partnership and engagement have allowed us to be responsive to community needs. 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 (203) 787-0187 or email me at jnoonan@bgcgnh.org.

Very best,

John Noonan
Resource Development Director

March 5, 2023

Stanley Poszywak, OCC Examiner-in-Charge
Large Bank Supervision, Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

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Connecticut Center for Arts and Technology (ConnCAT) works to inspire, motivate, and prepare youth and adults for educational and career advancement through job training and youth programming. ConnCAT specializes in market relevant workforce training in culinary arts, medical billing and coding, phlebotomy, and our recent biotech program.

KeyBank has been an engaged partner and has supported ConnCAT to inspire, motivate, and prepare youth and adults for educational and career advancement through job training and youth programming. 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 tremendous philanthropic support especially during the COVID pandemic crisis. They are also ConnCAT's neighborhood bank and the support of the Key Bank staff has been critical during this time. We are looking to partner with Key Bank with our sister organization, ConnCORP, to provide financial education and sponsor minority business mixers for local entrepreneurs.

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 deliver impactful programming to underemployed and unemployed local residents.

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 203-887-1884 or email me at ablanding@conncat.org

Anna Blanding

Anna Blanding

Chief Investment Officer