



February 25, 2023

██████████ 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 ██████████

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 Idaho Women's Business Center under the host of the Idaho Hispanic Foundation committed to supporting underserved and rural entrepreneurs on the path to capital readiness, economic recovery, and business growth. Given entrepreneurs' many challenges, systemic barriers for socially and economically disadvantaged individuals (SEDI) are more significant. We work with mostly early-stage SEDI entrepreneurs, and know that technical assistance, access to capital and affordable housing is critical for women, rural, Latinx, Black, Native American, and veteran businesses owners who provide a lifeline to local, state, and national economies.

KeyBank has been an engaged partner and has supported **the activities of the Idaho Women's Business Center**. 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 **helping us design and implement a mentorship program for SEDI entrepreneurs, as well as assisted in helping some of our clients get across the finish line in access to capital. Financial literacy is a strength of Key Bank and mirroring our program after the Key4Women platform has been invaluable. ██████████ has been an amazing philanthropic leader to the WBC and has shared her knowledge and experience of working with the Hispanic business community. We appreciate her attention to the needs of underserved women in Idaho who are working to create a better life for their families.**

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 **assist our clients in overcoming systemic barriers in finding access to capital through additional resources, one on one counselling and mentorship. 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 **208-880-2488** or email me at diane@idahowomen.org

A handwritten signature in cursive script that reads 'Diane Bevan'.

Diane Bevan, Idaho Hispanic Foundation, CEO & Idaho WBC Executive Director

Idaho Hispanic Foundation, Inc. 83-0536327

www.idahowomen.org (208) 996-1570



13 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 2023.

The Momentum Group (DBA Create Common Good) works to reduce recidivism of returning citizens (from incarceration) by providing *ServSafe* instruction and certification within Idaho's prison facilities.

KeyBank has been an engaged partner and has supported Create Common Good in our efforts to provide returning citizens with an employable skillset in the food service industry.

This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

Keybank Foundation has generously provided Create Common Good with philanthropic funding, allowing for the purchase of manuals and testing materials and the hiring of an instructor.

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 begin offering the *ServSafe* course in Spanish in 2023.

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

If you have questions, please contact me at 208-258-6800 or email me at cyn@createcommongood.org.

Gratefully,
Cyn Dalton, CEO

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