



February 28, 2023

██████████ OCC Examiner-in-Charge  
Office of the Comptroller

Via email to [CommunityAffairs@occ.treas.gov](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto:cra_comment_letter@keybank.com)

**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.

Since 1987 Habitat for Humanity of St. Joseph County, Indiana has helped more than 637 families build strength, stability and self-reliance through shelter. The organization mobilizes volunteers and community partners to build affordable housing and promote homeownership. Families and individuals in need of a hand-up partner with Habitat to build their own homes alongside volunteers and pay an affordable mortgage.

One in nine Hoosiers spend more than 50% of their pre-tax income on housing which leaves precious little for basic necessities like food, transportation, and medical care. Since 2001 the number of families living in poverty in Indiana has nearly doubled; and according to the U.S. Census Bureau, 16.6% of persons in St. Joseph County and 27% of persons in South Bend live in poverty. For these low-income families, getting a traditional mortgage is virtually impossible; and most are relegated to renting substandard apartments or houses. Recent increases in construction costs, supply chain issues, and skyrocketing home appraisals have only exacerbated the problem.

KeyBank has been an engaged partner and has supported Habitat for Humanity of St. Joseph County to help address the housing affordability crisis in our community. One example is their support of our Muffet McGraw Women Build which empowers women to help families who make less than 80% of the Area Median Income become homeowners for the first time. 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 has worked with us to meet the needs of our community by providing philanthropic support and board participation/volunteering. Their commitment and actions to serve the needs of low- and moderate-income communities are clear; and their partnership and engagement has helped us build 33 new homes and complete 49 home repairs for veterans and senior citizens in the last four years.

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 (574) 288-6967 or email me at [jwilliams@habitat-for-humanity.org](mailto:jwilliams@habitat-for-humanity.org)

A handwritten signature in black ink, appearing to read "Jim Williams", with a long horizontal flourish extending to the right.

Jim Williams

President & CEO

03/14/23

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](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto: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.

**Harmony Housing is a non-profit qualified as a public 501(c)(3) organization. Harmony has two basic missions. Most directly, it provides and preserves affordable rental communities. In addition, it uses its net cash flow for a myriad of charitable activities.**

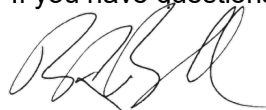
KeyBank has been an engaged partner and has supported **Harmony Housing in our mission to preserve and maintain affordable housing**. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by **providing flexible and creative financing**.

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 be adaptable and opportunistic in achieving our mission of preserving and maintaining affordable housing. Harmony currently owns 147 affordable properties and over 14,700 units, this would not have been possible without Key's 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 [bob.barolak@greyco.com](mailto:bob.barolak@greyco.com).



Name: Robert Barolak

Title: President



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

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.

Indiana Black Expo, Inc. (IBE), was created 53 years ago to be a voice and vehicle for the social and economic advancement of youth and families in Indiana. Anchored by a core focus on education and economic empowerment, IBE develops programs that drive long-lasting, positive change for the underserved in communities across the State. Revered as a leading organization in the city of Indianapolis, the state of Indiana, and across the nation. IBE's strong ties to community residents, civic leaders, volunteers, and the media have earned a reputation as a trusted, invaluable, empowering, and essential partner - not only for Indiana's Black community, but for Hoosiers across the State.

Since its inception in 1970, Indiana Black Expo, Inc. (IBE). has been providing training, procurement opportunities and networking to minority-owned businesses. KeyBank has been an engaged and longstanding partner of Indiana Black Expo for IBE's Black Business Conference. The Black Business Conference, scheduled on July 10-11, is a two-day conference of workshops and networking opportunities inside the Indiana Convention Center held during IBE's Summer Celebration. The Black Business Conference focuses on creating strategies to level the playing field and offer business equity opportunities in diversifying Indy's procurement ecosystem.

After the start of the pandemic in 2020, IBE conducted extensive outreach to over 1800 small minority businesses across the state of Indiana to better understand their need for financial and educational resources, technical support and training due to the pandemic. As a result of the findings, in 2021 KeyBank agreed to partner with IBE's efforts to launch The Black Business Training Institute, to provide business management training to Black-led businesses in central Indiana.

Since 2014, a KeyBank representative has served on the Indiana Black Expo Board of Directors. 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

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 (317)925-2702 or email me at [awatson@indianablackexpo.com](mailto:awatson@indianablackexpo.com)

Alice Watson

A handwritten signature in cursive script that reads "Alice Watson".

President & CEO  
Indiana Black Expo, Inc.



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 on behalf of the Indianapolis Neighborhood Housing Partnership (INHP).

INHP is an affordable housing entity serving individuals and families with low and moderate incomes and the neighborhoods in which they choose to live. INHP is an AERIS rated Community Development Financial Institution, originating commercial and consumer loans that have impacted nearly 43,000 families since 1988. INHP supports individuals and families through comprehensive homebuyer and financial education, one-on-one homeownership advising, home purchase and home repair lending, and economic mobility programming for renters. Additionally, INHP supports the creation and preservation of affordable housing through developing affordable single-family homes for sale, land banking, community lending and grantmaking.

INHP partners with local, state, and federal government agencies, community organizations, civic groups, banks and lending institutions, and corporations. Our mission is to leverage the individual strengths and mobilize the collective power of our member organizations, helping all people live in vibrant and inclusive communities where access to affordable homes creates opportunity and economic mobility.

Throughout our history we have maintained high levels of involvement from financial institutions and KeyBank is a long-term partner that has been vested in INHP's mission and programs and serves as a local advocate for affordable housing. For example, KeyBank has partnered with us in the following ways:

- Serving in a leadership capacity by actively participating as a Member of our Board of Directors, specifically as the current Board Chair
- Engagement in special purpose initiatives including our Community Engagement Research study regarding various demographic subgroups within the low and moderate income community as well as the Executive Search for our new president and CEO
- Providing affordable first mortgage lending products to families with low and moderate incomes
- Serving as industry experts through volunteerism in our financial literacy and homebuyer education classes
- Providing grants to support access and choice for families with low and moderate incomes in their journey for sustainable affordable housing in the Indianapolis community
- Providing sponsorship funds to support local events to showcase and elevate affordable housing solutions and raise critical operating support for INHP's comprehensive suite of services grounded in affordable housing and community development

We look forward to continuing our partnership with KeyBank as we work together to meet the affordable housing needs of the Indianapolis community through both supply and demand side strategies. If you have questions regarding our partnership with KeyBank, please contact me at 317-610-4670 or [mhoover@inhp.org](mailto:mhoover@inhp.org).

Sincerely,

Morgan Hoover  
VP, Philanthropy and Marketing  
INHP



Indianapolis  
Urban League

777 Indiana Avenue  
Indianapolis, IN 46202

Phone: 317-693-7603

Fax: 317-693-7613

Web Address:

[www.indplsul.org](http://www.indplsul.org)

February 28, 2023

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*Empowering Communities.  
Changing Lives.*

Via email to [CommunityAffairs@occ.treas.gov](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto:cra_comment_letter@keybank.com)

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.

As one of over 90 National Urban League affiliates and since 1965, the Indianapolis Urban League has worked to empower African-Americans and all people to attain economic self-sufficiency through job training, access to good jobs with livable wages and benefits, entrepreneurship training and small business capacity building, housing and homeownership and financial literacy and wealth accumulation. The IUL also provides programs and initiatives that promote educational attainment, address health disparities, encourage civic engagement and leadership and advocacy for equality, equity, civil rights and racial justice.

KeyBank has been an engaged partner and has supported the Indianapolis Urban League's mission which is to empower African-Americans and disadvantaged individuals to achieve social and economic equality and improved quality of living through programs, services, and advocacy in education, workforce development, entrepreneurship, health and housing. 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 providing corporate sponsorship and philanthropic for our economic development programs which include financial coaching and literacy and various workforce and entrepreneurship initiatives, trainings and supportive services. 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 workforce and entrepreneurship trainings, financial literacy and coaching and supportive services to over 3,000 participants and over 150+ entrepreneurs and small business owners.

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 317-693-7603 or email me at [tmason@indplsul.org](mailto:tmason@indplsul.org).

Sincerely,

Tony Mason  
President & CEO







# JOHN BONER NEIGHBORHOOD CENTERS

JBNCENTERS.ORG • PH: 317.633.8210  
2236 EAST 10TH STREET • INDIANAPOLIS, IN 46201

February 28, 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](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto: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.

John Boner Neighborhood Centers (JBNC) is a nonprofit social services and community development organization founded to serve residents on the Near Eastside of Indianapolis. JBNC offers programming that spans from school-aged children to older adults. The purpose of this programming is to connect neighbors to community resources and equip them with the skills, knowledge, and confidence to reach self-sufficiency and an improved quality of life. This is accomplished through programs and services related to financial success, educational achievement, health and wellness, affordable housing, and community development.

KeyBank has been an engaged partner and has supported JBNC's mission to inspire neighbors and partners to improve the quality of life on by providing tools for change and growth. 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 as a long-time supporter of the following programs:

- **Indy Free Tax Prep:** As part of Central Indiana's Network for Free Tax Preparation and the IRS' Volunteer Income Tax Assistance program, JBNC offers free tax preparation and other services to eligible residents.
- **Individual Development Accounts (IDAs):** As an asset development strategy, JBNC utilizes matched savings accounts to assist individuals in the purchase of their own home, the pursuit of education, or starting their own businesses.
- **Financial Education:** JBNC helps neighbors increase capacity to create, build, and pass down long-term wealth through education, coaching services, and career development.

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 bring tools to the community that create, retain, and build wealth alongside households that have experienced generational and/or immediate challenges.



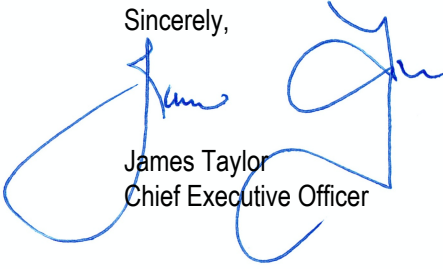
# JOHN BONER NEIGHBORHOOD CENTERS

JBNCENTERS.ORG • PH: 317.633.8210  
2236 EAST 10TH STREET • INDIANAPOLIS, IN 46201

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 (317) 808-2300 or email me at [jtaylor@jbncenters.org](mailto:jtaylor@jbncenters.org).

Sincerely,



James Taylor  
Chief Executive Officer

March 9, 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](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto: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.

The Julian Center works offers immediate safety and security to adults and children fleeing domestic violence.

KeyBank has been an engaged partner and has supported The Julian Center to help victims of domestic violence and abuse become successful survivors through supportive services, education, and cooperative partnerships that foster hope, promote self-sufficiency, and rebuild lives. 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 has worked with us to meet the needs of our community by granting The Julian Center \$5,000 grants on 12/6/2021, and 10/10/2022.

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 house, feed, and protect those in need.

If you have questions, please contact me at 317-941-2200 or email me at [jbrown@juliancenter.org](mailto:jbrown@juliancenter.org).

Jeff Brown

President/CEO

February 22, 2023

██████████ OCC Examiner-in-Charge  
Large Bank Supervision, Office of the Comptroller

Via email to [CommunityAffairs@occ.treas.gov](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at  
[cra\\_comment\\_letter@keybank.com](mailto:cra_comment_letter@keybank.com)

Re: KeyBank's CRA Examination

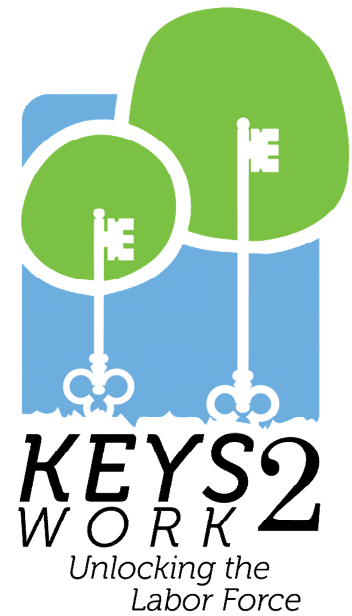
Dear ██████████ ██████████

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.

KeyBank has been an engaged and important partner, and has consistently supported Keys2Work, and provided banking assistance to those experiencing homelessness and the justice-involved young adults we serve. This support demonstrates KeyBank's commitment to serving the Indianapolis low-income neighborhoods in which we operate, predominantly The IndyEast Promise Zone and federally designated Opportunity Zones.

Keys2Work (Keys2) is a nonprofit alternative staffing organization. We provide supported wage paying employment for persons experiencing homelessness and justice-involved young adults in Indianapolis. I have been serving this population for more than 25 years. My nonprofit is an outgrowth of the MBE/WBE business Keys to Work, Inc. which I founded in 1996. In 2020, after many years as a Minority and Woman owned business, I made the decision to change our status to a nonprofit to better serve our clients and to better position our services to disadvantaged workers by gaining access to grant funding and the type of support that is available from CRA programs. Although MBE/WBE set asides are critical to help minority- and women-owned business thrive, but support we need to serve our targeted populations are only available to nonprofit organizations.

During this transition from a MBE/WBE for profit company to a nonprofit organization, one of our most important partners was KeyBank and their CRA officer ██████████. ██████████ has been in her position with KeyBank for several years, and she is well-known to me and the broader African American community in Indianapolis. Her knowledge of our work was important as we made the difficult decision to change our status. I cannot say enough about ██████████ and KeyBank who were there for us in so many ways as we made this transition. It is rare to find a CRA office so well versed in the community, and I believe one of the important attributes of KeyBank and their CRA work in Indianapolis is ██████████ and her long connection to the Indianapolis Community. Over my many years as an MBE/WBE business, many banks reached out to us to serve the MBE/WBE community. However, the mergers and acquisitions that have occurred over my tenure made for a lack of consistency in how banking services were delivered to organizations like mine. I can say without hesitation that KeyBank and ██████████, who knows us and the community well, is an important attribute to Indianapolis. Banks need to pay attention to who is in the CRA positions to ensure that when mergers and acquisitions happen that some level of consistency is maintained when changes occur. KeyBank and ██████████ are head and shoulders above other CRA programs I have worked with. That consistency is important, and KeyBank deserves credit for keeping one person at the helm and not making so many changes like others do.



KeyBank's commitment and actions to serve the needs of low- and moderate-income communities and organizations like mine are clear. Key's partnership and engagement have allowed us to be responsive to community needs, and KeyBank provided us our first philanthropic grant. That KeyBank grant opened the door for other philanthropic grants, not least of which is a recent grant we have received from the Indianapolis African American Quality of Life Initiative funded by the Eli Lilly Endowment here in Indianapolis. Having a long serving CRA officer like [REDACTED] has been important to Keys2's success in serving low-income communities in Indianapolis. As you evaluate the KeyBank CRA program, I suggest you make note of [REDACTED] and her tenure.

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

If you have questions, please contact me at 317-714-6061 or email me at [jkeesling@keys2.org](mailto:jkeesling@keys2.org).

Sincerely,

A handwritten signature in cursive script that reads "Jannett Keesling".

Jannett Keesling  
President

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](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto: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.

La Plaza's serves the Latino community in Central Indiana through a number of programs and services to expand homeownership, small business capacity building, financial education/inclusion and products for the unbanked.

KeyBank has been an engaged partner and has supported La Plaza mission to strengthen Central Indiana by preparing Latino students for educational success and connecting Latino families to essential health, social services and workforce development opportunities and services. 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 through philanthropic support, financial education and small business capacity building.

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 support small businesses, increase financial literacy and help unbanked individuals open bank accounts.

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 317.890.3292 or email me at [miriam@laplaza-indy.org](mailto:miriam@laplaza-indy.org)

Sincerely,



Miriam Acevedo Davis  
President & CEO





March 3, 2023

Stanley Poszywak, OCC Examiner-in-Charge  
Large Bank Supervision, Office of the Comptroller  
127 Public Square  
Cleveland, OH 44114-1306

Via email to [CommunityAffairs@occ.treas.gov](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto:cra_comment_letter@keybank.com)

Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am delighted to have the opportunity 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. Martindale Brightwood Community Development Corporation (MBCDC) is a 501(c)3 tax-exempt organization, focused on sustainable community revitalization in and around the Martindale Brightwood community, through housing, community education, workforce development and environmental justice. There is inter-sector synergy between Key Bank's initiatives and our organization's long-time mission.

MBCDC works collaboratively with trusted partners like KeyBank's Indianapolis team to address the needs of our community around preserving and increasing affordable housing in the area, working with small business owners to build their capacity, also providing financial education and job readiness training. The area we serve has a 30% poverty rate, aging homes built over 100 years ago and in need of essential repairs, a 16% unemployment rate, and an annual median household income of \$33,000. From 2019 to 2021, KeyBank has worked with us to meet the needs of our community as engaged partners and has supported MBCDC home repair program where we are able to complete repairs for 25 households annually, provide education to over 30 small business owners, and they provide technical support and guidance to our organization through board participation and volunteerism. This support demonstrates the Bank's commitment to serving low- and moderate-income neighborhoods through philanthropy and direct participation in our planning and [REDACTED]

KeyBank's partnership and engagement has allowed us to be responsive to community needs and helped us to bring resources to aid in revitalizing our neighborhoods. We look forward to continuing our partnership with Key Bank as we work together to assess and tackle needs in and around our service area. We are proud of the impact that their support has enabled us to have in the community. Please feel free to contact me with any questions at 267-242-8827 or email me at [apierson@mbcdc.org](mailto:apierson@mbcdc.org).

Sincerely,

*Amina Pierson*

Amina Pierson  
Executive Director



40 W 40<sup>th</sup> Street • Indianapolis, IN 46208 • [www.MLKCenterIndy.org](http://www.MLKCenterIndy.org) • 317.923.4581

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March 3, 2023

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Cleveland, OH 44114-1306

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Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer remarks regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. We, Martin Luther King Community Center, work to educate youth, empower families, and build community through quality multi-generational programs that advocate for our neighbors, promote racial justice, and provide a peaceful space to connect.

KeyBank has been an engaged partner and has supported MLK Center in its quest to create a meaningful impact on the lives of those we serve by fostering inclusiveness and the values of Dr. Martin Luther King, Jr. During the peak of our COVID-19 response, Key Bank has provided us with financial support to assist families in crisis, such as housing, utility assistance, or transportation needs.

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 also helped us to expand our reach through the funding of viable assistance and programming that not only addresses immediate needs of our families, but also aids them in their growth as they overcome the factors that have kept them in poverty. 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 317-923-4581 or email me at [Allison@mlkcenterindy.org](mailto:Allison@mlkcenterindy.org).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Allison'.

Executive Director





February 23, 2023

██████████ OCC Examiner-in-Charge  
Large Bank Supervision, Office of the Comptroller

Via email to [CommunityAffairs@occ.treas.gov](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto:cra_comment_letter@keybank.com)

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 the period 2019 through 2021. While my comments below are related to the years indicated, it is important for me to state that our KeyBank CRA officer, ██████████, has been a strong and consistent partner for us more than 18 years. Since our formation in 2004, our nonprofit has worked with various banks and CRA programs. We apply for grants and various government funding that requires a CRA partner, or partners that provide financial literacy. We have worked with many bank CRA programs, and I feel we have seen the best and the worst of CRA programming. During that time many banks have merged and/or changed CRA officers and/or CRA focuses, and for groups like ours, just keeping up with mergers and how CRA focuses change has been daunting. My grant writer said some years back, "I need a support just to help me keep up with how mergers and CRA focuses change."

As you evaluate KeyBank's efforts, and other CRA bank programs as well, let me take this opportunity to say that consistency is important. I hope you have consistency as a scoring component of your exam activities. For us that constant has been ██████████. Over these many years, ██████████ has simply been there. When other bank's CRA officers and CRA focuses came and went, it is ██████████ and the stability KeyBank provided her in her position that has been the most important thing. Not only does ██████████ know us, but she knows our community.

██████████ consistency is why our management team and our board of directors decided in 2019 to center our work with KeyBank as our primary banking partner to help those we serve. Whatever your exam and scoring might entail, KeyBank should get an A+ for consistency, and consistency with a topflight person like ██████████. In these times of multiple bank mergers and changes, consistency is important and something that often gets lost in mergers and changes in how banks try to serve low income communities.

Workforce, Inc. DBA RecycleForce is an Employment Social Enterprise (ESE). RecycleForce has the two-fold mission of recycling (predominantly) end-of-life electronics and providing transitional employment and industry-recognized training for people reentering the community from prison and jail. An ESE embeds wage paying transitional jobs program into its social enterprise to serve marginalized populations more effectively. The ESE guarantees employment for those unlikely to be employed in the competitive job market then transitions these workers to better employment opportunities. RecycleForce calls its model ABC Model: Any job – Better job – Career.™



RecycleForce predominantly serves young adults leaving juvenile and adult incarceration who are at moderate- to high-risk to return to prison. A great percentage of those we serve do not have banking relationships and lack the financial skills to effectively manage their wage earnings. Understanding personal finance and having the discipline to manage a budget and save for the future are key factors in achieving personal life goals. Building knowledge about personal finance – financial literacy – is a key skill for those we serve to manage their financial lives with confidence. Many we serve have been victims of fraud or have had their financial relationships disrupted due to their incarceration.

We have worked with many different banks and CRA programs. I can say without hesitation that in the period between 2019 – to today, KeyBank is the most committed and effective bank we have ever worked with. Through our relationship with [REDACTED] and the committed KeyBank staff at their Meridian Street office where many we serve bank, in 2019 RecycleForce made KeyBank our primary financial partner to help improve the financial literacy of the people we serve, all of whom are living in impoverished communities in Indianapolis. KeyBank personnel have worked with our case management team to develop financial empowerment programs that provide access to the information and tools that contribute to good financial decisions. KeyBank is onsite weekly at RecycleForce to work with our newly enrolled clients/employees and assist with opening checking and savings accounts, despite past banking issues, and helping those we serve improve their financial wellness. No other bank has ever done for us what KeyBank has been doing since 2019.

KeyBank has not only worked with us to meet the banking and financial needs of our clients, but the KeyBank Foundation provided us a \$300,000 grant to build out and equip the *KeyBank Financial Wellness* room in our new facility that will open in June 2023.

<https://recycleforce.org/2022/12/12/300000-investment-from-keybank-to-fund-transformative-financial-wellness-program-at-new-recycleforce-facility/>

KeyBank’s commitment and actions to serve the needs of low- and moderate-income communities are clear. KeyBank’s partnership and engagement have allowed us to be responsive to community needs and helped us in more ways than this letter allows me to detail. We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community.

If you have questions or need further insight, I encourage you to email me at [gkeesling@recycleforce.org](mailto:gkeesling@recycleforce.org) or call me at 317-532-1367 ext 101.

Sincerely,

Gregg Keesling  
President



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

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.

Indiana Black Expo, Inc. (IBE), was created 53 years ago to be a voice and vehicle for the social and economic advancement of youth and families in Indiana. Anchored by a core focus on education and economic empowerment, IBE develops programs that drive long-lasting, positive change for the underserved in communities across the State. IBE has 12 chapters throughout the state to better serve the citizens of their respective communities. IBE Chapters play a crucial role in ensuring that our services meet the needs of specific communities.

The Indiana Black Elkhart Chapter has been in existence for over 50 years and actively involved in the Elkhart Community. The Elkhart chapter leadership provides programs and initiatives for youth and families monthly. Each year Elkhart Chapter puts together a workshop with IPFW & IUSB to help children from the city of Elkhart to get an early jump on gearing up for college from FASFA to fill out college applications. KeyBank provided \$10,000.00 in support of Elkhart Indiana Scholarship Fund in 2021. During the IBE Statewide Conference, the Elkhart chapter leadership was presented with the Chapter of the Year Award.

Since 2014, KeyBank representatives has served on the Indiana Black Expo Board of Directors and supported Elkhart County. 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

The Elkhart Chapter looks 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 (574)226-4328 or email me at [574magazine@gmail.com](mailto:574magazine@gmail.com)

Robert Taylor

*Robert Taylor*

President  
IBE Elkhart Chapter

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

Via email to [CommunityAffairs@occ.treas.gov](mailto:CommunityAffairs@occ.treas.gov) and KeyBank at [cra\\_comment\\_letter@keybank.com](mailto: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.

The Center for the Homeless is an 80,000 square-foot facility located in South Bend, Indiana, and serves more than 2,500 people annually. We serve as a place of hope and opportunity for nearly 200 people who reside at the facility, including more than 50 children. Over the years, the Center has formed valuable and collaborative partnerships that have allowed us to offer the best services to the people who need them the most, including a Continuum of Care program. This revolutionary program is founded upon partnerships with every sector of the community and has been endorsed by the U.S. Department of Housing and Urban Development (HUD).

Key Bank has been instrumental in supporting the Center's Emergency Services Program and Jobs, Training Education Center (JTEC,) an on-site, job-training and education program that provides guests the ability to receive education, training and self-help programs. The Emergency Services Program offers both immediate and long-term help when guests enter the facility. Our JTEC program aims to provide additional educational support, as well as close the gap in training needs that often hinder guests as they re-enter the job force. Another instrumental program includes the financial literacy program that teaches guests important financial skills such as opening a bank account, budgeting, credit building, tenant rights, etc.

KeyBank has been an engaged partner and has supported the Center for the Homeless for many years. The mission of the Center is to help people break the cycle of homelessness, bring together disparate groups so that each can discover the worth, dignity and God-given potential of the other and to pioneer a service model worthy of replication. 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 both the immediate emergent needs of our guests, as well as long-term needs by supporting our Emergency Services program and JTEC program that in turns provides job training, financial literacy classes and other job and technical skills that will help guests transition out of homelessness and into a more secure housing and jobs. Reintroducing people back into the local economy by opening bank

accounts, managing their financial resources and living in more stable housing is one of the most important things we do at the Center.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear and their partnership and engagement has allowed us to be responsive to community needs and helped us to serve as a beacon of hope to those in our community who are homeless and often jobless. Without KeyBank's support of our mission, we cannot do what we do to not only provide temporary shelter, but truly change the trajectory of people's lives.

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 574-282-8700 or email me at [scamilleri@cfh.net](mailto:scamilleri@cfh.net).

A handwritten signature in black ink that reads "Stephen P. Camilleri". The signature is written in a cursive style with a large, stylized initial 'S'.

Steve Camilleri  
Executive Director  
Center for the Homeless

For best print results, choose PDF in the export menu. X

723 at 4:56 PM EST ☆

0 subscribers

NEW

Respond

Reassign Alert

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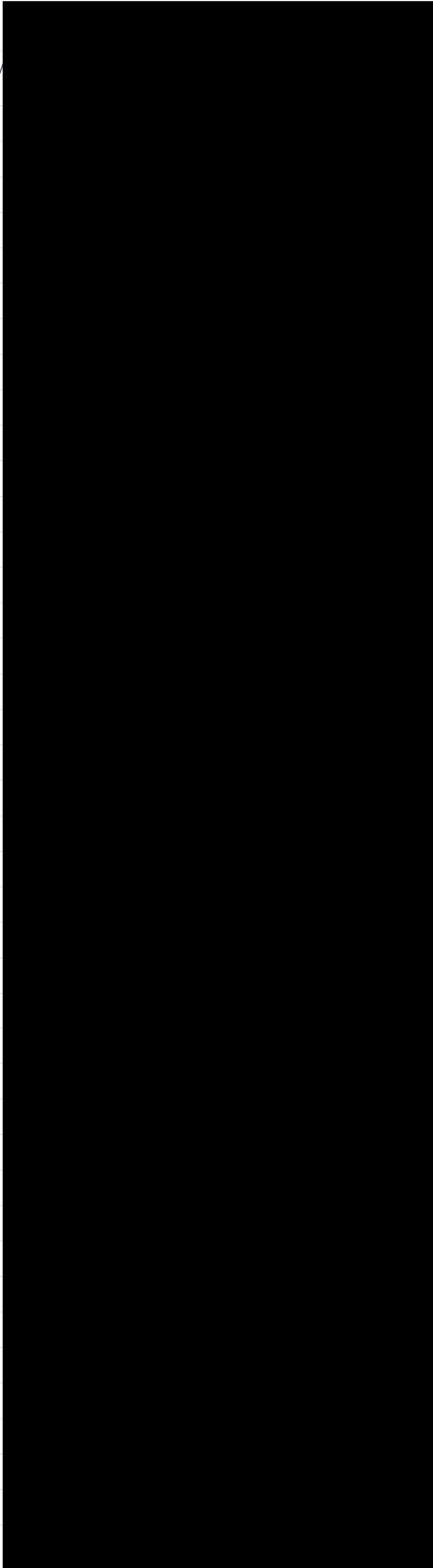
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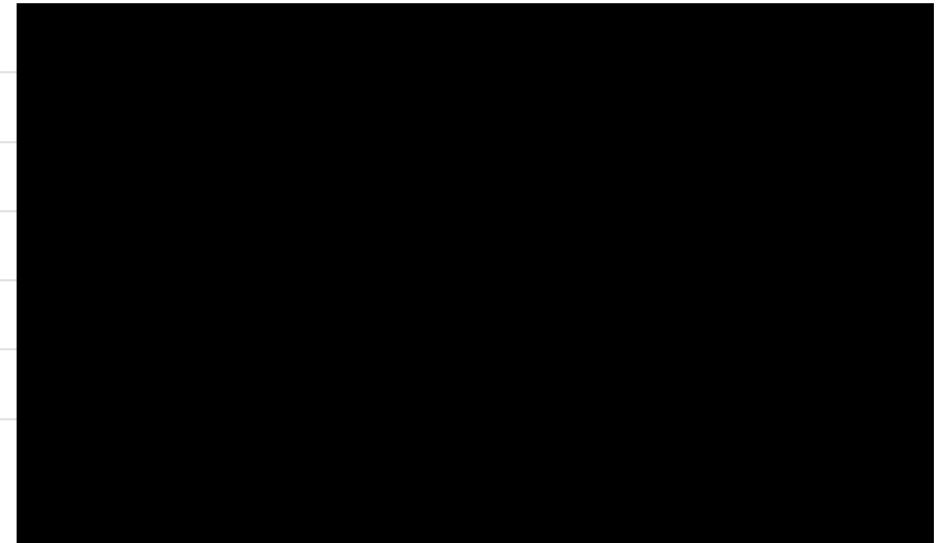
#### Customer Information

- Business Platform
- Channel Type (Online Banking / Mobile App / KeyNavigator)
- Consumer Digital Unit
- CUSTOMER ID
- Digital Intro text
- Individual or Organization
- P3 Flag
- Relationship Segment
- Session Length
- Transaction Status
- Digital NPS
- Ease of Doing Business
- Business Checking Flag
- Business Credit Card Flag
- Checking Flag
- Client Age
- Customer DNS Election
- Customer Type
- Digital Platform
- KeyCashFlow Flag
- Language
- Positive Pay Flag
- Primacy Checking Flag
- Primacy Flag
- Primary RM Code
- RDC Flag
- Savings Flag
- Transaction Count
- Transaction Time
- Transaction Time
- Email
- Investable Asset Level
- Transaction Date (ET)
- Transaction ID
- Annualized Revenue
- Digital 3b Flag
- Tenure
- Tenure Text
- Customer ID
- Business Segment
- Transaction Description
- Transaction Event Code
- Primary RM Name



#### Metadata Information

- Response Date (ET)
- Survey ID
- IPI
- Customer IPI
- Transaction ID
- Unit
- Survey Program





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7/23 at 4:56 PM EST



**Alert status set to New**

06/20/2023, 7:34:24 PM EST · System Generated



**Alert Assigned**

06/20/2023, 7:34:24 PM EST · System Generated

Automatically assigned to [CLF] ECR Team

[View More](#) ▾

**Score Report**

**Net Promoter Scores**

Digital NPS



**Digital**

Digital NPS



Preferred Contact Method

Yes - Please contact me via phone  Yes - Please contact me via email  No

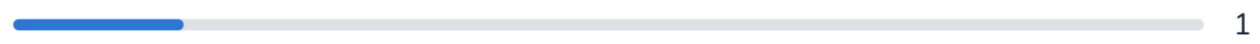
Did you experience any problems?

Yes  No

Channel Type (Online Banking / Mobile App / KeyNavigator)

Online Banking Service  Mobile App  KeyNavigator

Overall Digital Satisfaction



Ease of Doing Business



Satisfaction with Speed



Satisfaction with Accessibility



Satisfaction with Ease of Navigating



Satisfaction with Appearance



Impact of Problem

Minor  Moderate  Severe

Satisfaction with Understanding Features



Individual or Organization

Individual  Organization

Preferred Zip Code



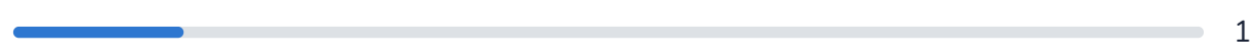
Satisfaction with Range of Services



Recall using KeyBank's Digital Banking

Yes  No  Don't Know

Satisfaction with Information Clarity



Has Problem Been Resolved

Yes  No

**Contact Method**

Preferred Contact Method

Yes - Please contact me via phone  Yes - Please contact me via email  No

**Verbatims**



Understanding features reason  
Same

Range of services reason  
As previously mentioned.

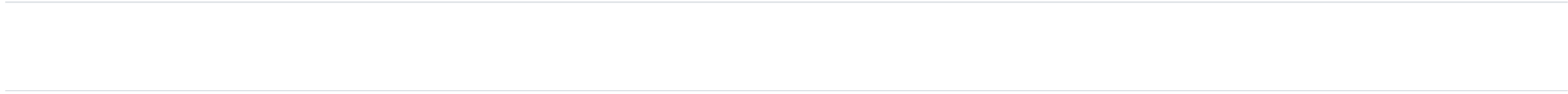
Please tell us the reasons for your rating.  
Closed all but one branch in town. Closed satellite ATM's forcing people to use your app. But at least you have a DEI VP.

Problem reason  
There's no longer any reason to keep doing business with your institution.



⚠ For best print results, choose PDF in the export menu.

723 at 4:56 PM EST

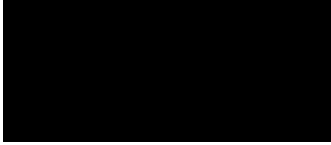






**KeyBank**  
**Enterprise Client Relations**  
127 Public Square  
Cleveland, OH 44114

July 20, 2023



Re: Key Case No. 2FW3LS

Dear 

Thank you for contacting us regarding your recent concern related to the Southway branch consolidation.

KeyBank is committed to a strong branch network in the communities we serve tailored to client convenience and preference. We know that while mobile and online options offer tremendous speed and convenience, many clients still want to sit down, face-to-face with our branch professionals to discuss more complex banking needs.

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

KeyBank is committed to making this transition as smooth as possible for our clients. Clients can expect to continue to receive the same high level of service from KeyBank at other nearby branches and will continue to have access to KeyBank's ATM network, telephone banking at 1-800-KEY2YOU, online banking via the internet at key.com, and mobile banking. For clients using a TDD/TTY device, please call 1-800-539-8336. Our clients have many options to connect with KeyBank when, where, and how they prefer.

Lastly, please be assured that KeyBank takes its Community Reinvestment Act (CRA) responsibilities seriously. KeyBank is proud of its Outstanding ratings, which reflect our ongoing commitment to serving our communities and neighbors. For more information on how KeyBank invests in its communities and helps clients and communities thrive, please visit: <https://www.key.com/about/corporate-responsibility/corporate-responsibility-reporting.jsp>

If I can be of further assistance, please contact me, citing the case number above, at 1-800-625-3256. For clients using a TDD/TTY device, please call 1-800-539-8336. We are available Monday through Friday from 8am to 7pm Eastern time.

Sincerely,

