

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 Cleveland, OH 44114-1306

Via email to <u>CommunityAffairs@occ.treas.gov</u> and KeyBank at <u>cra_comment_letter@keybank.com</u>

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.

FocusMaine works to grow good jobs in Maine by investing in three of the state's globally competitive and high-growth fields—agriculture, aquaculture, and biopharmaceuticals—and by strengthening Maine's workforce capacity. We leverage the resources and expertise of high-impact organizations whose mission aligns with ours to work faster and more efficiently to move Maine's economy forward.

KeyBank has been an engaged partner and has supported FocusMaine since 2017 to create quality jobs, build a thriving Maine economy, and enhance opportunity and prosperity for Maine people. 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 offering philanthropic support to power of projects and programs.

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 create positive impacts for Maine's people, businesses and communities.

In just five years, over 215 Maine companies have benefitted from our programs and over 2,470 students have participated in our experiential learning programs. FocusMaine's efforts have resulted in measurable job growth, an impressive array of programs and tools to support business growth and attraction, and significant new resources that are shaping the economic trajectory of Maine. These achievements would not be possible without the support of KeyBank and other supporter who believe in our mission and energize our work.

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

LEADERSHIP TEAM

Michael E. Dubyak Co-Chair, FocusMaine Former President, CEO, & Chairman WEX, Inc.

Andrea Cianchette Maker Co-Chair, Focus Maine Former Partner Pierce Atwood

Michael Bourque President & CEO MEMIC

Jay Dearborn Chief Strategy Officer WEX, Inc.

Dr. John Fitzsimmons President Emeritus Maine Community College System

Charles E. Hewett, PhD Executive Director Institute for Engineering and Life Sciences (IDEALS)

Former Maine Market President KeyBank

Ed McKersie Founder & President ProSearch. Inc.

Dana O'Brien President FocusMaine

ADVISORY TEAM LEADS

Academic

Joan Ferrini-Mundy Team Chair President University of Maine UMS Vice Chancellor for Research and Innovation

Business

Dana Connors Team Chair President Maine State Chamber of Commerce

CONTACT

128 State Street #101 Augusta, ME 04330 (207) 200-3813

info@focusmaine.org

FocusMaine.org



If you have questions, please contact me at 207-200-3813 or email me at lauraengland@focusmaine.org.

Lawa England

Laura England Communications & Outreach Manager

PENQUIS Helping Today · Building Tomorrow

March 13, 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.

Penquis works to alleviate and eliminate the causes and conditions of poverty through expansion and preservation of affordable housing, homeownership, small business capacity building, financial education/inclusion, and CDFI lending, as well as access to early childhood education, transportation, and a myriad of supports for youth, adults, and families.

KeyBank has been an engaged partner and has supported Penquis in assisting individuals and families in preventing, reducing, or eliminating poverty in 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 providing financial support for a workplace Financial Wellness Program. The program gave employees the knowledge, skills, tools, and resources to improve their financial wellbeing while increasing their capacity to support Penquis clients in their journeys to self-sufficiency.

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 strengthen our capacity to make a measurable difference in the lives of the people we serve through increased financial capability.

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 (207) 973-3643 or email me at khay@penquis.org.

Sincerely,

Kara Hay Chief Executive Officer

262 Harlow Street PO Box 1162 Bangor, Maine 04402 (207) 973-3500 1-800-215-4942 www.penquis.org

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

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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.

Avesta Housing Development Corporation (Avesta Housing), a Portland, ME-based nonprofit organization with assets of \$320 million and an annual operating budget of \$58.8 million, works to improve lives and strengthen community by promoting and providing access to quality affordable housing for people in need. Avesta operates 100 properties (including two assisted living residences that serve MaineCare seniors) throughout Maine and New Hampshire. Avesta is the largest organization of its kind in northern New England with nearly 300 employees. Avesta's properties house approximately 4,000 people every night in over 3,000 apartments. Nearly 20 properties are in various stages of development representing 300 additional units of affordable housing. Founded in 1972, Avesta recently celebrated its 50th anniversary. Avesta has been recognized for its innovative "green" building techniques, including LEED Platinum, LEED Gold, and Passive House certifications, and was named Outstanding Affordable Developer by the U.S. Green Building Council.

KeyBank has been an engaged partner and has supported Avesta Housing to improve lives and strengthen communities by promoting and providing affordable homes for people in need. This support demonstrates its 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 funding several initiatives that are critical to our mission. KeyBank's funding totaled \$188,333 for the examination period which included the onset of the COVID pandemic and the first full year of living in a global health crisis. These funds were used for the following Avesta functions:

- <u>HomeOwnership Center</u> Avesta's HomeOwnership Center (HOC) provides homebuyer education classes and financial stability counseling for not just our residents but all community members. Job and wage losses that resulted from the pandemic and rapidly rising inflation rates have adversely affected low- to moderateincome individuals disproportionately. HOC resources were able to quickly mobilize and address issues for over 3.500 people during this period. KeyBank provided \$91,667 for these efforts.
- <u>Sustainable Low-Cost Energy Sourcing</u> Avesta provides heat and/or electricity to 98% of our residents at over 100 properties throughout its footprint. The average income for a senior living in an Avesta property is \$17,732 and for a family it is \$26,530. Rising energy costs are not passed to residents of Avesta properties but absorbed as an unfavorable variance on Avesta's Income Statement. Avesta Housing is working with ReVision Energy, a solar energy provider, to construct an

array that will provide safe sustainable solar energy to heat and light rural properties. Operational savings will be utilized to create new housing units. KeyBank provided \$30,000 for these efforts.

• <u>Supporting Senior Housing</u> – Avesta Housing provides housing to nearly 2,000 seniors in Maine. As the state with the highest median age (44.6 years) in the country, Maine has the oldest population in the country that is also aging at the fastest rate of any in the country. To address those needs Avesta conducted its first ever multi-year fundraising effort to expand access to housing and housing related services for seniors. Legacy properties in need of upgrades to accommodate and modernize to address senior needs were also beneficiaries of funding raising from this effort. Avesta raised \$2.4 million over three years to address senior specific needs and create senior housing units so that older Mainers could remain in the communities or residences that they call home. Key Bank contributed \$66,667 to this effort.

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 to continue to provide housing and housing related to services during an unprecedented time of crisis. The COVID pandemic and subsequent economic maelstrom generated never experienced distress for all, but particularly for low- to moderate- income individuals who faced employment and health consequences without the safety net that many others had access to. Funding from KeyBank allowed Avesta to adapt and continue our programming and mission for the most vulnerable members of our community. Without the support of KeyBank and other organizations like it, Avesta would have been forced to reduce staff availability, services, and access at a time when these were most needed by an at-risk population.

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 207-245-3358 or email me at <u>rhatfield@avestahousing.org</u>.

Rebecca Hatfield

President and CEO



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,

This is a letter supporting KeyBank's exam pertinent to the Community Reinvestment Act's requirement of institutional commitments to serving low- to moderate-income neighborhoods.

Founded by two asylum seekers in 2017, the Greater Portland Immigrant Welcome Center provides vital linkages to language instruction, incubator services, and a range of civic engagement, cultural and community-focused opportunities. An immigrant-run organization, its constituents, as of early 2023, include individuals and families from Afghanistan, Angola, Burundi, Cambodia, China, Colombia, Congo, Ethiopia, Ghana, Haiti, Iran, Iraq, Mexico, Namibia, Rwanda, Somalia, Sudan, Ukraine and Vietnam. Our goal is the successful integration and inclusion of every newcomer to this community. By *succees*, we mean the full participation of immigrants in the many benefits of life in our state, through good-paying employment, educational advancement, access to health care and nutritious food, economic opportunity, home ownership, and civic engagement – all the things most Mainers take for granted, but that can seem very distant to someone arriving here with few resources.

Through its Charitable Foundation, KeyBank has been a consistent financial supporter of the Immigrant Welcome Center and its programs, achieving notable results. Last year, more than 400 immigrants, refugees and asylum seekers received English language instruction through our classes; 40 business startups took advantage of our co-working space and access to microloans; our Community Navigators produced 43 public events to register voters and distribute free nutritious food in immigrant neighborhoods. KeyBank has been a strong partner in helping the Greater Portland Immigrant Welcome Center to serve the needs of our constituents. We look forward to continuing to work with KeyBank to strengthen Maine's immigrant communities, and encourage you to look favorably upon their commitment to community advancement. Thank you.

Warm regards,

Reza Jalali | Executive Director Greater Portland Immigrant Welcome Center 24 Preble Street, 4th Floor Portland, ME 04101

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Re: KeyBank's CRA Examination

Dear Mr. Poszywak:

I am honored 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.

Maine Medical Center (MMC) has remained true to our mission for 150 years: caring for our communities, educating tomorrow's caregivers, and researching new ways to provide care. With our unique role as both a community hospital and a regional referral center, Maine Medical Center provides an unparalleled depth and breadth of healthcare services for all Mainers.

The southern region of Maine is home to a vibrant population of New Mainers – refugees, asylum seekers, and other immigrant populations. In Portland, the New Mainers population has doubled in the last decade to over 7% of residents and a third of Portland Public Schools' students are multilingual. At Maine Medical Center's Portland Family Medicine Clinic, we provide care for diverse patients of all ages, from infants to seniors. Our patients know more than 50 languages, and over 900 have a primary language other than English. Arabic, French, Somali, Spanish, and Vietnamese are the most common.

Many refugees, immigrants and asylum seekers are incredibly strong and resilient survivors of war-torn countries, violence, and trauma. These past experiences often result in complex medical, social, and behavioral needs when they arrive in Maine. Common challenges include language and cultural barriers, mental health issues, trauma, and different levels of health literacy. Social determinants of health such as poverty, food insecurity, transportation issues, and housing and employment constraints can be persistent barriers to achieving good health. At MMC, we believe there is no better way to improve the health and prosperity of our neighbors facing disenfranchisement than to partner with community health workers. By practicing community-clinical partnerships, our care team can effectively bridge community-clinical barriers and provide accessible, high-quality, and coordinated care for underserved community members.

For more than four decades, KeyBank has been an engaged partner and philanthropic leader in championing Maine Medical Center's efforts to improve health outcomes in the northeast region. This committed support demonstrates its commitment to addressing social determinants of health and eliminating inequities in accessing high-quality, coordinate care for marginalized populations. From 2019 through 2021, KeyBank's partnership and engagement were vital in allowing us to navigate the challenges of this ever-changing healthcare landscape and be responsive to community needs.

In 2020, KeyBank worked with us to address health care inequities by improving the quality of care for vulnerable patient populations impacted by COVID-19. The adverse impact of racial and ethnic disparities in healthcare have been brought into clear focus through the disproportionate burden of the COVID-19 pandemic on minority communities. Maine has one of the highest COVID-19 racial disparity rates in the nation: minorities account for 24% of cases vs. 1.4% of Maine's population. By awarding a \$45,000 foundation funded grant, KeyBank enabled Maine Medical Center's Department of Family Medicine to expand services to this vulnerable group. With this support, MMC had the resources to train our workforce to listen to and learn from minority communities, and develop sustainable partnerships to improve access to care.

This program laid the ground work for developing a sustainable, systems-based, community approach to integrate minority health disparities learning opportunities for Family Medicine resident physicians in collaboration with community-based organizations. Underserved populations and immigrants in Maine directly benefited from healthcare delivered with cultural humility, enhanced support services, and strong community partnerships that will increase access to and reduce fragmentation of care. Additionally, KeyBank's support of this critical initiative helped to establish a core team of supporters and collaborators across the institution to advance a shared vision of diversity, inclusion and health equity benefiting all people of Maine.

KeyBank's partnership with Maine Medical Center in 2020 facilitated significant groundwork to improve the health of immigrant communities for the future. Through funded resources for multi-lingual clinical, curricular, and community education projects and interventions, MMC made great strides in improving access to care for underserved populations. This work allowed MMC's Division of Community Health and Preventative Medicine to collaborate and foster bidirectional communication between non-English speaking neighbors and community health care workers. As a result, the MMC team was able to design a formal community health worker (CHW) pilot program to address health care disparities within vulnerable patient populations while diversifying our workforce.

In 2021, KeyBank again partnered with us to bolster our health care mission by supporting our vision to build a Community Health Worker (CHW) program. The award of an additional \$45,000 foundation grant launched the Portland-based pilot year of the CHW program. In its first year, this pilot helped standardized CHW training and clinical integration while collecting community data for analysis, including chronic illness biometrics, patient and provider satisfaction and service utilization. Additionally, the Community Health and Preventative Medicine team has developed a bidirectional public health messaging plan with CHWs visiting local community centers, general assistance and shelters to connect with patients and families. A second year of additional funding from KeyBank in 2022 ensured the opportunity for continued program growth as well as the hiring of the inaugural CHW, who is currently serving the Congolese community and speaks Lingala, French, Swahili, and English.

KeyBank's continued philanthropic partnership is helping to develop a workforce that effectively bridges community-clinical barriers and provides accessible, high-quality, and coordinated care for underserved community members. Incorporating CHWs into our system is a cost-saving and efficient way to address healthcare disparities and improve patient outcomes. By breaking down access to care through the integration of CHWs, MMC expects to reduce hospitalizations by a projected 30%, and readmissions by 25%. Additionally, each trained CHW in our program has the potential to bring health equity to around 1,500 Mainers with the opportunity to expand across geographic and demographic groups. None of this would be possible without KeyBank's continued partnership and investment in personalized approaches to health care services and outreach for Maine's disenfranchised neighbors.

KeyBank is playing an integral role in Maine Medical Center's quest to constantly raise the bar for the care we provide to our communities. We are grateful for the longstanding partnership that exists between KeyBank and MMC and we are proud of the efforts that we've achieved to bring health equity to so many in Maine.

If you have questions, or if I can be of further assistance, it would be my pleasure to discuss any of the above in more detail. Please email me at John.M.Curran@mainehealth.org.

Sincerely,

John Curran Associate Vice President for Development Maine Medical Center



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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 Olympia Snowe Women's Leadership Institute works to address the well-documented confidence and self-esteem challenges girls face as they transition from middle to high school. If left unchecked, lack of confidence persists well into adulthood. Women bring a unique perspective to the table yet are not well represented. The program's innovative, evidence-based curriculum enhances mainstream education by emphasizing skills that are not traditionally taught in the classroom. Research shows that interventions that build these skills bolster persistence and directly improve high school graduation and college enrollment rates, are equally valuable for all students, and maintain positive effects for at least four years.

KeyBank has been an engaged partner and longtime supporter of the Institute's mission to raise the confidence and aspirations of high school girls by helping them develop the skills required to be leaders in their lives, families, careers, and communities.

Specifically, KeyBank Foundation provides financial support to deliver the program at Lewiston High School. Lewiston represents the Institute's most diverse school community—100% of Olympia's Leaders (or "OLs," program participants) qualify as low- to-moderate income and represent the following racial/ethnic breakdown: Class of 2022: 50% Non-White and 50% White; Class of 2023: 67% Non-White and 33% White; Class of 2024: 80% Non-White and 20% White.

From 2019 to 2021, KeyBank has worked with us to meet the needs of Olympia's Leaders in this community and throughout Maine. The Institute has benefited from the talents and volunteer time of many KeyBank leaders. Served, Senior Vice President, and Regional Trust Director, served as an advisor from September 2015-June 2021, mentoring two cohorts of OLs through the entirety of the Institute's three-year program and their transition to post-secondary education. In December 2018, was elected to the Institute's Board of Directors for two, three-year terms (through 2024) and is also a valuable member of the Corporate Development Committee, where she assists the Institute in building business partnerships throughout the state.

Vice President Branch Manager, has served as an OLA at Spruce Mountain High School since 2018. She is currently in her second term and her co-OLA is the Institute's first OL



Alumna to complete the program, post-secondary education, and now volunteer as an advisor.

This support demonstrates KeyBank's commitment to serving diverse, low- and moderate-income neighborhoods through philanthropy and volunteerism.

(Vice President and Relationship Manager at KeyCorp), and (Corporate Responsibility Officer) also participate on the Institute's Leaders Network—a group of more than 350 women who participate in networking, and professional and personal development workshops, and serve as role models to OLs during select program activities.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed the Institute to be responsive to community needs and helped us to successfully deliver the program to young women from myriad backgrounds in Lewiston, Maine. According to data from the Census Bureau, 18.1% of the population for whom poverty status is determined in Lewiston live below the poverty line, a number that is higher than the national average of 12.3%. The program benefits both OLs and the larger community because it prepares girls in Lewiston to persist through crises of confidence, commit to education, and enter the workforce with critical skills necessary to be successful in their chosen professions and ultimately lift themselves out of poverty. The Institute's program is having tremendous impact. Between 2019 and 2021 100% of Olympia's Leaders graduated high school and 83% matriculated to post-secondary education. And, encouragingly, 75% are pursuing studies in STEM fields. This is evidence that these Olympia's Leaders have the confidence to follow predominantly male-dominated career paths.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of this community, and the state of Maine.

If you have questions, please reach out to me.

Kind regards,

and which can

Christina P. McAnuff Executive Director christina@oswli.org



BOARD OF DIRECTORS

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55 Portland Street Portland, ME 04101 207.775.0026 info@preblestreet.org www.preblestreet.org 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 writing today to share our very positive experience working with KeyBank. We have had a strong partnership with KeyBank for years and appreciate their support for our agency's mission and programs and their ongoing philanthropic efforts in our community.

Preble Street is a 24/365 social work agency that provides accessible, low barrier services to those experiencing poverty, homelessness, and hunger in our community and advocates for solutions to these problems. We operate emergency shelters for women, teens, and individuals with complex medical, mental health, and substance use related needs; Housing First programs that provide independent supportive apartments to adults and young adults; and healthcare services for people experiencing homelessness, including lowbarrier treatment, care-coordination, and case management. We provide statewide support for veterans and survivors of human trafficking, including rapid re-housing and comprehensive case management to help people move beyond the crises in their lives into stable housing. We also operate the largest emergency food program in northern New England, serving over 1 million nutritious meals each year out of our Food Security Hub; and we work to create statewide public/private partnerships to reduce hunger in Maine, especially for children living in poverty.

KeyBank has been supportive of Preble Street throughout our growth as an agency. Through the KeyBank Foundation, we have received gifts to support specific programs, gifts to boost our capital campaigns, and matching gifts for individual KeyBank employee donations. Most recently, KeyBank provided us with a generous gift in support of the development of our Food Security Hub: a sustainable, comprehensive, and collaborative approach dedicated to ending hunger in Maine, the purchase of which was executed utilizing a KeyBank mortgage.

In addition to providing financial support and partnership, KeyBank has been there for us in person. Our Emergency Food Programs have benefitted from KeyBank employees helping to prepare and serve meals to homeless and low income members of our community.

March 1, 2023

Through KeyBank's history of giving and community support, they have demonstrated a commitment to being responsive to the needs of the community, including our lowest-income neighbors. Please feel free to contact me any time with questions. I can be reached at (207)775-0026, or via email at mswann@preblestreet.org.

Sincerely,

Mark R. Swann, MSPA Executive Director





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

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Dear Mr. Poszywak:

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Spurwink ensures that those affected by behavioral health challenges and developmental disabilities live healthy, engaged lives in their communities. Serving over 8,500 children, adults, and families across Maine, Spurwink provides behavioral health and educational services for people of all, ages-improving lives and strengthening Maine communities. Through an evidence-based therapeutic model and an entrepreneurial approach, Spurwink provides access to care across the lifespan in areas of great need in Maine: mental health, trauma, autism, substance use, and intellectual and developmental disabilities. In addition, Spurwink offers an array of residential and community-based programs in schools, homes, and other locations.

KeyBank has been an engaged partner and has supported Spurwink in providing behavioral health and educational services for children, adults, and families. 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 philanthropic investment for young people with behavioral health challenges and intellectual disabilities. During the covid pandemic, KeyBank allowed flexibility with previously restricted funding to meet client needs. Their understanding of adapting to meet critical needs during this unprecedented time from 2020 to 2021 was crucial to our success in meeting the increased unmet needs of those impacted by the pandemic. Two examples of this investment include:

• In 2019, a KeyBank Foundation grant built a playground at the Willow House that addressed sensory and motor activity needs for residents ages 8-18 on the autism spectrum and with developmental and intellectual disabilities. The playground allowed children to not only play outside but also develop and build foundation knowledge and confidence to help students access sensory tools to promote regulation. In addition, funding trained staff to utilize sensory and OT equipment to help clients develop strategies to address dysregulation and improve daily functioning.



ADMINISTRATION 207.871.1200 phone 207.871.1232 fax 901 Washington Ave Suite 100 Portland, ME | 04103

www.spurwink.org



• Investing in workforce training and development for direct care, clinical, and education staff at Spurwink, helping address the Maine Behavioral Health Care workforce crisis.

Funding provided matching tuition reimbursement for staff continuing their education and opportunities for professional development in the behavioral health and education fields, improving the expertise and wage potential of the Spurwink workforce. In addition, KeyBank's investment allowed Spurwink to retain and attack new staff in these crucial fields due impart due to the pandemic. In the long term, this investment will lead to more consistent care for children and adults with behavioral health challenges and a highly trained workforce that can meet the diverse needs of Spurwink's clients across Maine.

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 start a new residential treatment program for adults with co-occurring mental health diagnoses and substance use disorder. In addition, they are helping to address the opioid epidemic in Maine. Their unrestricted support has been part of establishing the first Living Room Crisis Center in Maine, which provides an interim option between mobile crisis, law enforcement intervention, and the emergency department in a warm and welcoming environment. The Living Room Crisis Center is a voluntary and compassionate alternative for those experiencing a mental health crisis who might otherwise have been taken into law enforcement custody or to an emergency room.

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 (207) 871-1211 x 2197 or email me at emeyer@spurwink.org.

Sincerely,

Ein Megon

Eric Meyer, MBA, LCSW President & CEO





54 Lighthouse Circle • South Portland, ME 04106 • Ph: 207.321.6151 • maineccfoundation.org

March 8, 2023

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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.

The Foundation for Maine's Community Colleges works to ensure that the state's seven community colleges have the resources they need to provide a high quality and affordable college education for Maine people. The majority of students enrolled in Maine's seven community colleges come from rural areas and are low- to moderate-income. The foundation seeks to enhance access to higher education and economic opportunity and to provide Maine employers with a highly trained and skilled workforce. To this end, the foundation develops sustainable sources of philanthropic support for the Maine Community College System. Through this work, the foundation helps the colleges achieve their mission of providing and increasing higher education opportunities for Maine citizens. Since it's founding, the foundation has raised over \$63 million in both restricted and unrestricted gifts to support the work of the seven community colleges.

KeyBank has been an engaged partner and has supported The Foundation for Maine's Community Colleges to ensure that the state's seven community colleges have the resources they need to provide a high quality and affordable college education for Maine people. 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 funding a three-year initiative running from 2021 to 2025 with \$400,000 to support an expansion of MCCS' electrical journey technician program to train 100 additional new workers to address the shortage of

available licensed electrical workers. Trainees were recruited through standing agreements in place with organizations such as Maine Department of Labor's Unemployment Offices and Career Centers, nonprofit organizations dealing with Maine's immigrant population, veterans outreach services and other state non-profit organizations who provide services for low-income Mainers. Additionally, the Maine Market President of KeyBank, Served as a board member for the foundation for Maine's Community Colleges. His successor, Served as a board the board upon served.

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 train electricians to work in the fields of solar energy and heat pump installation. The funding for this program has enabled the colleges to train more people in a state-of-the-art facility.

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 (207) 321-6151 or email me at jfitzsimmons@maineccfoundation.org.

John Fitzsimmons

John Fitzsimmons John Fitzsimmons (Mar 8, 2023 15:03 EST) President