



1400 Woodbridge, Detroit MI 48207 Phone: (313) 962-5255

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

March 3, 2023

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. Matrix Human Services is one of the oldest and largest non-profits serving the City of Detroit. Since 1906, Matrix has been working to give hope and lift up individuals and families in need.

Matrix's goal is to raise individuals to self-sufficiency and break the cycle of inter-generational poverty. Matrix operates out of 20 locations around the city of Detroit. We are imbedded in the city's neighborhoods and the community trusts us to guide them in the right direction.

Matrix is the largest provider of Head Start pre-K programming in the city. We also have a large Community Health program focusing on people living with HIV. Our adult services group provides workforce development training, housing counseling, financial literacy, a high school diploma program, and other services to assist adults in stabilizing their life. We also run youth programming after school to give kids activities plus expose them to potential careers.

KeyBank has been an engaged partner and has supported Matrix Human Services to through a generous four year grant to support our online high school diploma program. 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 in addition to the high school diploma program, KeyBank has also provided funding to support our workforce development efforts to help bring people who have never held formal jobs into the workforce. KeyBank is also an important supporter of our fundraising events both through sponsorship and attendance.

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 make a difference in people's lives by providing essential skills like a high school diploma or training on how to obtain a job and hold a job.



MATRIX
HUMAN SERVICES

"Touching Hearts, Changing Lives"
Established 1906

1400 Woodbridge, Detroit MI 48207 Phone: (313) 962-5255

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 248-792-1230 or email me at bcoulter@matrixhs.org.

Brad Coulter
President & CEO

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 writing to offer my support for KeyBank in relation to their Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021. As the Director of Development at Home Repair Services of Kent County, I have witnessed firsthand the commitment and dedication of KeyBank to serving the needs of low- and moderate-income neighborhoods.

At Home Repair Services, we strive to strengthen vulnerable Kent County homeowners because strong homeowners build strong communities. We do this through home repairs, self-help programs, and financial education workshops. KeyBank has been a valuable partner in achieving our mission. Their encouragement of teammates to provide expertise through volunteerism and board service has been exemplary. One of their leaders has actively supported Home Repair Services by engaging as a board member and volunteer. This support has demonstrated KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

KeyBank has worked with us to meet the needs of our community by providing us with an active member of our Board of Directors and supporting us financially with a generous donation beginning in 2022. Their partnership and engagement have allowed us to be responsive to community needs and helped us to promote our suite of services to the broader community.

In conclusion, KeyBank's commitment, and actions to serve the needs of low- and moderate-income communities are commendable. We look forward to continuing our partnership with them as we work together to meet the needs of our community.

Please do not hesitate to contact me if you have any further questions.

Sincerely,



Steven Nicolet
Director of Development
Home Repair Services of Kent County
616.241.2601 | snicolet@homerepairservices.org



BOARD OF DIRECTORS

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ANN ARBOR OFFICE
3810 Packard Suite 260
Ann Arbor, MI 48108
Phone: (734) 975-6880
FAX: (734) 975-2956

JACKSON OFFICE
216 E. Biddle Ste 200
Jackson, MI 49203
Phone: (517) 841-5780
FAX: (517) 795-1400

mapagency.org

March 1, 2023

██████████ OCC Examiner-in-Charge
Office of the Comptroller
127 Public Square
Mail Code: OH-01-27-1006
Cleveland, OH 44114-1306

Via email to KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear ██████████

On behalf of Michigan Ability Partners (MAP), I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam.

MAP works to end homelessness in Washtenaw County by providing affordable housing opportunities to very low-income individuals including a large population of Veterans. Additionally, MAP provides job training and placement to homeless veterans to help them improve their overall stability. Financial services including Representative Payee services help ensure eviction prevention.

KeyBank has been an engaged partner and has supported Michigan Ability Partners and partnered with us in our work to promote self-sufficiency with the low-income disabled populations we serve. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

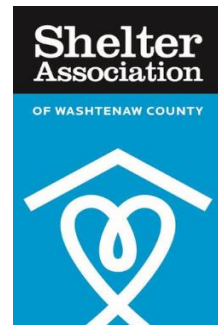
Since 2018, KeyBank has worked with us to meet the needs of our community by providing philanthropic support for expanding housing services for homeless Veterans, our Key4Vets program as well funding for capacity building in MAP's Permanent Supported Housing Program, allowing us to serve additional low-income community members needing supportive services to stay housed.

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 housing opportunities for many low-income members of our community.

MAP is extremely grateful to KeyBank and 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 734-975-6880 x 212 or email me at jlittle@mapagency.org.

Jan Little, Chief Executive Officer
Michigan Ability Partners



March 23, 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 ██████████

The Shelter Association of Washtenaw County is celebrating its 40th year of Ending Homelessness One Person at a Time. We are the community's premier adult homeless shelter serving 1200 adults annually with the offering of transformational shelter, temporary shelter, day shelter services, community resource allocation, mental, medical, and behavioral health support and employment assistance services.

KeyBank understands the complex needs of vulnerable populations and the reliance individuals have on caring, compassionate Case Management staff members to help them overcome their health and housing barriers. Our 15-year partnership and the financial support we receive from KeyBank allows us to support a population of individuals including those living at or below the poverty line (95%) with disabilities (80%), with mental illness (70%) that are senior citizens (35%) suffering from substance abuse disorders (30%), that are returning citizens (20%) and the LGTBQ community (8%).

Shelter allows individuals to get inside out of the outdoor elements, access services for improved living conditions, provides food security, a safe place to sleep, hot showers, clean clothes, storage for belongings, but above all else improves an individual's self-esteem, self-worth, and purpose.

Operating Support from KeyBank helps us provide a safe and welcoming place for people seeking refuge here and supports day to day operations that allow individuals the opportunity to manage their affairs, work on their housing plans, engage in social activities, access their basic needs, and seek companionship all leading to an improved quality of life and the audacity to hope and achieve a long-term sustainable lifestyle. We are extremely grateful for KeyBank's support and rely heavily on the community to help us meet the needs of our neighbor's experiencing homelessness. Please contact me if any additional information is needed.

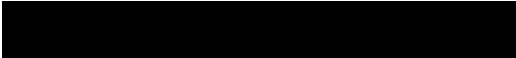
Gratefully,

A handwritten signature in black ink that reads "Sarah Paspal-Jasinski".

Sarah Paspal-Jasinski
Development Director
Shelter Association of Washtenaw County
312 W. Huron St, Ann Arbor, MI 48103
paspals@washtenaw.org
734-678-2378



◀ Active complaints

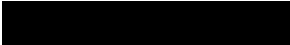


Primary consumer information

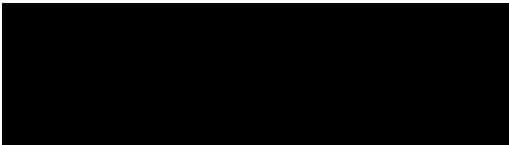
FULL NAME



PHONE



ADDRESS

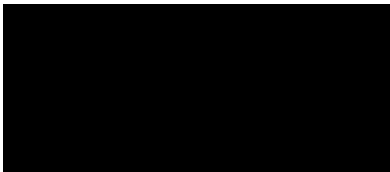


Methods of identification provided by the consumer

ACCOUNT NUMBER



BILLING ADDRESS



Affiliations provided by the consumer

CONSUMER IS

[REDACTED]

Service details

Branch: [REDACTED]

Status: [REDACTED]

Product information

PRODUCT OR SERVICE

[REDACTED] (Other banking product or service)

ISSUE

Closing an account

Can't close your account

CONSUMER IDENTIFIED COMPANY NAME

KEY BANK

What happened

On January 12th of 2023, I went to key bank with this the purpose of opening a [REDACTED] account with the intention of getting a [REDACTED], as with this type of loan you are viewed on the credit worthiness of a business. I was not made aware of by the banker that my personal credit would be ran I learned of this days later and upon hearing that, I no longer wanted to do business with key bank even though I was a new customer and had deposited [REDACTED]. I decided that I was no longer going to be a customer, so I decided to close my account on January 21st, 2023. I called an made an appointment with the [REDACTED] on [REDACTED]. I was scheduled for 10:30 am, I was told to call once I arrived at the bank as they were drive-thru only but they do take appointments. They asked why I was there and I said I wanted to close my account. They stated they needed a manager to close the account but there was none so they would call around to get managers approval at a distance. [REDACTED] states [REDACTED] would call back in a few minute but [REDACTED] never did. then [REDACTED] from the branch where I opened the account at called back and said the banker just called and they said they don't want me at this

branch, they feel uncomfortable with me being there, they don't want me coming there and they don't like my attitude. ■■■ stated I was not welcome at the branch and I told them that I would go forward with a lawsuit. Since then I have been trying to close my ■■■■■ to no avail and the company will not assist me. they have records of all the calls I've made over the course of the last week being transferred from department to department with nobody knowing how to help me. To this date my funds are still held on my account at key bank. Coincidentally when I try to close my account they seems to be an issue, and I am attempting to take my money out electronically as I do not want to walk into a branch and potentially have law enforcement called as they have already stated that they don't want me there and the main issue is discrimination on the ground of racial bias that I am facing by key bank taking my funds and not allowing me to close my account in a timely manner.

ALREADY ATTEMPTED TO FIX THIS ISSUE WITH THE COMPANY?

Yes

Desired resolution

A fair resolution to this matter is for the courts to determine if in fact it was lawful or unlawful to have been discriminated against by key bank in this matter, In addition I want complete account closure and all funds withdrawn from the account in an expedited manor.

Response recipients

SUBMITTED BY

Primary consumer

WHO WILL RECEIVE RESPONSES?

Primary consumer

What is the company's response?

Response categories

In progress

- Closed with explanation
- Closed with monetary relief
- Closed with non-monetary relief
- Alerted CFPB
- Duplicate CFPB complaint reported
- Incorrect company
- Sent to regulator

COMPLAINT STATUS

COMPLAINT STATUS

[REDACTED]

SENT TO COMPANY

[REDACTED]

DUE DATE


[REDACTED]

ACTIONS

 Respond

 Print

[Terms of service \(terms-of-service\)](#)

 An official website of the United States Government



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

February 23, 2023

[REDACTED]

RE: [REDACTED]
CFPB Case No. 230127-10243911
Key Case No. 2E7WJM

Dear [REDACTED]

This letter is in response to your issue filed with the Consumer Financial Protection Bureau. We regret the frustrating experience you've had and would like to share the results of our investigation.

Our records confirm on January 12, 2023, you visited the [REDACTED] branch and opened the Account. During the interaction you applied for a [REDACTED]. As shown on page 5 section 1 of the enclosed signed application KeyBank disclosed a personal credit inquiry would be completed.

Ultimately on January 27, 2023, your application was denied, and the enclosed adverse action letter was sent to the address on file. A stated on the letter the decision to deny your application was due to limited credit experience, industry deemed high risk, and delinquent past or present obligations.

Further review determined your allegation of discrimination was unfounded. On January 21, 2023; you did not have a scheduled appointment with the [REDACTED] branch. However, you did call that day to request the Account be closed. After being advised Saturdays are appointment only hours, and manager approval is needed to close the Account the branch contacted the manager at the [REDACTED] branch where the Account was opened. Following this the manager from the [REDACTED] branch called to explain why a manager was needed to close the Account, and invited you to visit the [REDACTED] branch, or schedule an appointment at the [REDACTED] branch on Monday January 23, 2023.

Due to the behaviors exhibited when speaking to KeyBank branch personnel we were unable to close the Account that day. For assistance closing the Account please schedule an appointment with the [REDACTED] or [REDACTED] branch manager.

Regarding your concerns of being assisted by customer service, please be advised the phone calls were reviewed. Review of the phone calls found multiple representatives did assist you and escalated your concerns.

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and

State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g., family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

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,



Enterprise Client Relations
Office of the President



March 15, 2023 at 1:49 PM EST

[0 subscribers](#)

Respond

Reassign Alert

Close Alert

Add Note

Subscribe

Profile

Customer Information

Client ID

Email

CC Client Type

Age

Agent ID

Number of Holds

Number of Transfer

Tenure

Wait Time

Metadata Information

Response Date (ET)

Survey ID

IPI

CC Interaction Type

Unit

Client IPI

Survey Program

Unique Id

Activity



Note Added

03/16/2023, 1:33:44 PM EST - [REDACTED] Customer Advocacy Team
reassigned to ecr- trigger wording used redlining



Alert Assigned

03/16/2023, 1:32:32 PM EST - [REDACTED] Customer Advocacy Team
Assigned to [CLF] ECR Team by [REDACTED]



Alert Assigned

03/16/2023, 8:57:10 AM EST - [REDACTED] [CLF] Customer Advocacy Team
Assigned to [REDACTED]



Alert Assigned

03/15/2023, 1:56:49 PM EST - System Generated
Automatically assigned to [CLF] Customer Advocacy Team



Alert status set to New

03/15/2023, 1:56:49 PM EST - System Generated



Alert Created: Unresolved Problem - Contact Center

03/15/2023, 1:55:18 PM EST - System Generated
Unresolved Problem - Contact Center

[View Less](#)

Score Report

Net Promoter Scores

Contact Center NPS  0

Contact Center Drivers

Contact Center - Met Expectations  0

Overall Satisfaction with Representative (NSS)  0

Knowledge of the representative  0

Courtesy of the representative  3

Range of Services  3

Prompt Communication  3

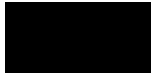
Others

Problem Experienced Yes No

Problem impact Minor Moderate Severe

Problem resolved Yes No

Preferred Contact Method Yes - Please contact me via phone Yes - Please contact me via email No




Reason for call Yes No

Segments

Segments



Verbatims

 Reason for Likelihood to Recommend Comment
The customer service representative was redlining me

Problem reason
I was already verified and had to repeat the process, I was continually asked the same questions



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

June 20, 2023



RE: [REDACTED]
KeyBank Case No. 10843422

Dear [REDACTED]

This letter is in response to your concern regarding recent interactions you had with KeyBank. We regret the frustrating experience you've had and would like to share the results of our investigation.

During a review of the interactions, you had with the contact Center related to making a Mortgage payment, we found that you were required to be verified twice. While we understand that this can be frustrating, all agents who interacted with you followed proper procedure. The verifications questions are designed to ensure the safety and security of our clients' information.

At KeyBank, we're committed to diversity, equity, and inclusion in all we do. Please be advised that we take discrimination claims seriously, and I want to assure you that KeyBank complies with all Federal and State anti-discrimination laws in addition to our own internal policies regarding discrimination. KeyBank does not discriminate against individuals based on age, race, color, religion, national origin, sex, sexual orientation, veteran status, disability, marital status, familial status (e.g. family size or childbearing intentions), receipt of public assistance income or any exercise of rights under the Consumer Credit Protection Act.

Thank you for allowing us to serve your banking needs and contribute to your financial wellness. 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,



Enterprise Client Relations
Office of the President