

March 14, 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.

North Willamette Valley Habitat for Humanity envisions a world where everyone has a decent place to live. We work hard to break barriers and disparities in housing by constructing affordable housing and providing financial education for our community. We work with individuals and families in our service area that wouldn't be able to qualify for a traditional home loan who fall at or below 80% AMI. We select our families based on three main criteria – need (such as substandard housing), ability to pay an affordable mortgage (we help with down payment assistance and ensure that mortgage payments stay within 30% of monthly income), and willingness to partner (all of our partner families put in up to 500 hours volunteering with our affiliate).

KeyBank has been an engaged partner and has supported North Willamette Valley Habitat for Humanity to build homes, community and hope. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement through both monetary assistance and volunteerism have allowed us to be responsive to community needs and helped us to build affordable housing in our community to address the growing need.

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 503.845.2213 or email me at bethany@nwvhabitat.org.

Bethany Wilt
Development Coordinator



Kidco Head Start

Tel: 541.451.1581 | Fax: 541.259.1581
300 Market Street, Suite 200
Lebanon, Oregon 97355
www.kidcoheadstart.org

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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.

Kids and Company of Linn County is a single purpose non-profit, whose sole program is Kidco Head Start. We have been serving Linn and Benton Counties since 1965, providing early learning for 0-5-year olds, and partnering with parents to further enhance their skills in areas they want to work on. For the children, we provide individualized early learning, with a focus on developing strong social emotional skills, needed for success in later life. With the parents, we have staff who work one on one with the parents in areas such as obtaining further education, financial literacy, parenting skills, gaining employment, and if interested in early childhood education, we provide resources to get them the skills to become a Kidco employee. In fact, on average, 33 percent of our parents who qualified for the program based on being at or below federal poverty guidelines, are now employed with Kidco, with over 75 percent of those having obtained an Associate's Degree or higher.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. KeyBank has supported a branch manager to give back to the community by engaging as an active board member and volunteer for Kids and Company of Linn County. 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 allowing [REDACTED] time to serve as an intricate member of our Board of Directors, along with serving on our fiscal committee. In addition, KeyBank staff have provided on-going financial

literacy trainings to our staff of 125 and have supported the organization in looking at ways to further develop our funding capacity.

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 not only make decisions effecting the communities we serve at the executive level through Board participation but have also provided staff with financial literacy knowledge.

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 skoehne@kidcoheadstart.org.

Sincerely,

**Stephany Koehne
Executive Director
Kids & Company of Linn County**



March 2, 2023

[REDACTED] 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 [REDACTED]

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. Our agency, ACCESS, is Jackson County's Community Action Agency located in Medford, Oregon. We offer food programs, energy assistance and education programs, supportive services to Veterans, emergency and long-term rental assistance, weatherization programs, home ownership assistance, and loans of durable medical equipment.

As a HUD Certified Housing Counseling Agency, our Homeownership Department provides pre-purchase education, and housing counseling, first-time home buyers down payment assistance, and Individual Development Accounts.

KeyBank has been an engaged partner and has supported ACCESS in our work to feed, warm, and shelter low-income Jackson County residents. The bank's support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy.

From 2019 to 2021, KeyBank has worked with ACCESS to meet the needs of our community by providing us with a \$10,000 grant in 2019 and a \$10,000 donation in 2021.

KeyBank's partnership and engagement have allowed us to be responsive to community needs and helped us to provide home purchase counseling and education to first time home buyers. 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 458-488-1206 or email me at jackieagee@accesshelps.org.

Sincerely,


Jackie Agee
ACCESS Grant Administrator



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 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.

The Housing Authority of Jackson County works to meet the need for affordable, permanent-rental housing in Jackson County in order to reduce the number of cost burdened households and stabilize lives for the clients we serve. This is an ongoing effort and our work is not nearly done.

KeyBank has been an engaged partner and has supported the Housing Authority of Jackson County to provide, develop and maintain decent, safe and affordable housing while promoting efforts toward self-sufficiency. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through lending and investments in our affordable, rental housing programs.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by investing in our work through the provision of loans to construct and operate long-term, affordable-rental housing.

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 become the largest developer, owner and operator of affordable housing in Southern Oregon.

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 (541) 622-8412 or email me at jason@hajc.net.

Sincerely,

Jason Elzy
Executive Director



United Way of Jackson County

██████████ 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 ██████████

United Way of Jackson County is proud 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. We have worked with KeyBank, their foundation, and employees for years on active community engagement. Of course, they were immediately present during COVID when our community immediately suffered. Later in 2020, we suffered a dramatic wildfire that destroyed more than 2,500 residences.

United Way's mission is to mobilize caring to affect change. We do this by focusing on the building blocks of a good life – education, income, health and transportation. Our education work is on high school completion. Our income work is focused on family stability including emergency assistance, free income tax prep and disaster recovery. Our health work is focused on mental wellness, suicide prevention, alcohol and drug treatment and more. Our transportation work is focused on helping people get where they want to go with a focus on aging folks, people with disabilities and low income people.

KeyBank has been an engaged partner and has supported [insert name of organization] to [insert mission]. 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 [insert how KeyBank has worked with your organization. Examples can include philanthropic support, board participation/volunteering, providing loans, or financial education].

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. They are present for our community. I'm happy to answer any questions you may have. My email is deeanne@unitedwayofjacksoncounty.org and my phone is 541.773.5339. We are better for their partnership in community.

Regards,

A handwritten signature in black ink that reads "Dee Anne Everson".

Dee Anne Everson
CEO/Executive Director



INNOVATIVE HOUSING, INC.

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 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.

Innovative Housing's mission is to efficiently and economically develop, preserve, and operate high-quality, affordable housing for low- and moderate-income households and to help our residents maintain their housing stability, improve their quality of life, and access opportunities to break the cycle of poverty. Our primary business activities are the development and operation of affordable housing.

KeyBank has been an engaged partner and has supported IHI in our efforts to develop 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 investing in Low Income Housing Tax Credits and providing construction and permanent financing to develop affordable housing, specifically at a new 129 unit project we are developing in Portland, Oregon. KeyBank is also an investor, and has been since 1991, in a 95 unit affordable housing community that IHI owns/operates in Old Town Portland that houses very low-income and vulnerable adults.

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 increase critical affordable housing resources in Portland.

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 (503) 998-6112 or email me at sstevenson@innovativehousinginc.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sarah Stevenson', is written over a light blue horizontal line.

Sarah Stevenson
Executive Director



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 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.

Network for Oregon Affordable Housing (NOAH) is a CDFI that provides a range of financing programs in support of affordable housing throughout Oregon. Formed in 1990, we currently administer about \$350 million of loan capital. The majority of that capital is deployed as permanent loans for affordable multifamily rental housing serving residents at 60% or less than area median income.

To date, NOAH has financed the development or preservation of over 14,000 units with loans totaling over \$490 million. In addition to financing, NOAH provides considerable expertise in the policy arena, advocating for affordable housing policies and resources.

Since our founding, including 2019 to 2021, KeyBank has been an engaged partner and has supported NOAH through loan capital and board representation. Recently, Key Bank increased its loan commitment to our programs, providing vitally needed additional loan capital. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

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 increase affordable housing opportunities in Oregon.

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 503-501-5680 or email me at billv@noah-housing.org.

Sincerely,

A handwritten signature in blue ink that reads "William A. Van Vliet".

William A. Van Vliet, Executive Director

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

Sent via e-mail to: CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

Re: KeyBank's CRA Examination

Dear Mr. Poszywak,

Please accept this letter from Portland YouthBuilders (PYB) regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Founded in 1995, PYB serves a diverse enrollment of 200 low-income young people between 17 and 26. PYB offers a program of academics, vocational training in construction and technology, career exploration, community service, and long term placement support, and is consistently rated by the U.S. Department of Labor as one of the highest performing programs among the 250 YouthBuild programs nationally. By providing young people with opportunities to develop career pathways in the construction trades, PYB offers a clear road out of poverty.

PYB's construction training program is approved by the Oregon Bureau of Labor and Industries (BOLI) as a registered pre-apprenticeship programs in which graduates earn a BOLI Pre-Apprentice Credential. This credential is highly respected in the construction industry, earning participants direct or preferred entry with many apprenticeship programs.

Since 2006, KeyBank has been an engaged partner and generous funder, furthering PYB's mission to support low-income youth who are committed to changing their lives to become self-sufficient, contributing members of the workforce and their community. From 2019 to 2021, KeyBank was a financial supporter of our newest vocational training efforts – the Bridge Construction Training Program, an intensive nine week program for low-income young people who demonstrate a strong interest in construction careers. Throughout this period, PYB participants, under the guidance of PYB's construction trainers, developed their construction skills by building homes with our long-time partner, Habitat for Humanity.

The recent and long-term grant support from KeyBank demonstrates its commitment to serve low-income communities in the Portland, Oregon metro region, and has given PYB the financial resources to address the workforce development needs of the young people we serve. PYB looks forward to continuing our partnership with KeyBank as we work together to create career-path employment for youth in our community.

If you have questions about PYB and our support from KeyBank, please do not hesitate to contact me at 503-286-9350 x241 or at jill.walters@pybpd.org.

Sincerely,



Jill Walters
Executive Director



March 15, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Proud Ground provides homeownership opportunities for working families especially for black, indigenous and people of color. Using the community land trust model, we ensure that the homes stay permanently affordable to serve families into the future. People of color have been shut out of the homeownership market due to many factors. Proud Ground, in partnership with many community partners, works to fill the gap in the racial disparity in homeownership so families, especially with children, have a chance to thrive. Our service area is the Portland Metro, Clark County, Washington and Lincoln and Jackson counties in Oregon.

KeyBank has been an engaged partner and has supported Proud Ground's *Opening Doors* campaign to raise private resources to leverage public dollars to fill the gap for families and make homeownership a reality. KeyBank is a leading contributor to this initiative and this vital support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropic giving.

From 2019 to 2021, KeyBank worked with us to meet the needs of our community through investments in subsidies for families leading up to the *Opening Doors* campaign and in the first year. 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 achieve success in the early stages of the 5-year effort to raise 5 million dollars to create at least 200 homeownership opportunities.

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

Dreams Start Here.

5288 N INTERSTATE AVE., PORTLAND, OREGON 97217, 503.493.0293, www.proudground.org



If you have questions, please contact me at 503 493-0293 or email me at dianelinn@proudground.org

Sincerely,

Diane Linn, Executive Director
Proud Ground

Dreams Start Here.

5288 N INTERSTATE AVE., PORTLAND, OREGON 97217, 503.493.0293, www.proudground.org

March 14, 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.

SOLVE works to support the health and cleanliness of Portland in several ways. Primarily, we empower community members to lead litter cleanup events safely and effectively. To facilitate this, SOLVE provides volunteer Event Leader training, free cleanup supplies, volunteer event planning assistance, and more to any community member looking to make a positive difference.

KeyBank has been an engaged partner and has supported SOLVE in our mission to bring Oregonians together to improve our environment and build a legacy of stewardship. 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 generous philanthropic support, volunteering at community cleanup events, and sponsoring SOLVE's most impactful series of urgent-need litter removal projects.

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 focus on driving community cleanup support to Portland's East County, where many of our city's LMI communities reside. The effects of SOLVE's emphasis are clear within our data; over the last twelve months, 47% of all litter, statewide, that our staff and volunteers have collected and properly disposed of has come from just six zip codes in Portland's East County.

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 503-943-2834 or email me at josh@solveoregon.org.

Josh Keller
Development Director, SOLVE
josh@solveoregon.org
503-943-2834

United Way of the Columbia-Willamette

619 SW 11th Avenue
Portland, OR 97205
503.228.9131
Fax: 503.226.9385

**United Way of the
Columbia-Willamette**



www.unitedway-pdx.org

March 15, 2023

██████████ OCC Examiner-in-Charge
National Bank Examiners
127 Public Square
Mail Code: OH-01-27-0554
Cleveland, OH 44114-1306

Re: KeyBank's CRA Examination

Dear ██████████

I am pleased to offer comments regarding KeyBank's Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

United Way of the Columbia-Willamette works to advance equity by mobilizing, responding, and investing with our community partners to improve and strengthen lives. We invest in eviction prevention assistance to keep people in their homes as well as transitional housing and programs that provide services to create long-term housing stability. We invest in organizations and programs that focus on communities of color before, during and after a disaster or crisis. We invest in early education programs focused on children of color because data shows that they are most affected by the inequity in our education system. We invest in volunteerism because we believe doing good transforms our community and each of us individually. KeyBank has been an engaged partner and has supported **United Way of the Columbia-Willamette**. 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 donating over \$220,000 between 2019 – 2021 to our United Way.

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 improve lives, strengthen communities and advance equity by mobilizing the caring power of people across our region.

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 **503-226-9363** or email me at DaveR@unitedway-pdx.org

Dave Rogers

Chief Development Officer



workforce
SOUTHWEST WASHINGTON

March 17, 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.

Workforce Southwest Washington works to create a region where economic prosperity and growth exists for every person. We focus on ensuring that businesses have access to hire, develop and invest in the skilled workers they need; job seekers have access to high-quality employment and advancement opportunities; and the workforce system is accessible and effective to advance equity for individuals and the community.

KeyBank has been an engaged partner and has supported Workforce Southwest Washington in leading a regional workforce development system where every individual has access to high-quality employment and every business has access to a highly skilled workforce. This support demonstrates its commitment to serving low and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank partnered with us to meet the needs of our community by providing philanthropic support. This support provided opportunity for a pilot of a part-time outreach and navigation position from one of our workforce organizations in a low-income neighborhood. This position allowed a staff member to spend time in the low-income neighborhood on a weekly basis, where they could interact with residents and business owners who otherwise wouldn't have been able to access workforce training, education, and employment.

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 deepen community connections between the public workforce system and this community.

Serving businesses, job seekers and youth in Clark, Cowlitz and Wahkiakum counties.



workforce
SOUTHWEST WASHINGTON

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 503.367.8193 or email me at mhalliday@workforcesw.org

Sincerely,

Miriam Halliday

Miriam Halliday
Chief Executive Officer
Workforce Southwest Washington
mhalliday@workforcesw.org