



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.

Since 1987, with the help of businesses like KeyBank, North Hills Community Outreach has helped struggling families in communities in northern Allegheny County get through difficult times and work toward self-sufficiency. Our services include three food pantries and an organic garden, seasonal Sharing Projects, utility assistance, emergency financial help, Education Assistance for nontraditional adults, WorkAble employment mentoring, Free Tax Preparation, Ask the Attorney legal consultation, budget coaching and Smart Investments for Women, In Service of Seniors volunteer care giving for seniors, two Free Rides for Seniors shuttles, Transportation Assistance, and much more.

There are no fees for NHCO's services. We rely on the generosity and support of individuals, businesses, schools, foundations, government and religious organizations and our many volunteers to carry out our mission of helping people in crisis, hardship and poverty.

We know well that KeyBank encourages its team members to provide expertise through volunteerism and board service. We are fortunate to have a good deal of involvement from KeyBank, led by [REDACTED]. What stands out is his efforts to make KeyBank more inclusive. He is the President of the PRIDE Greater Pittsburgh LGBTQ group within KeyBank. [REDACTED] also serves of the Greater PGH DEI Council and is a Recruitment and Retention committee member for the National PRIDE Resource Group within Key Bank. [REDACTED] leads a terrific branch out of the Wexford office and is known as an outstanding manager and leader within KeyBank. He also ensure that minority communities get the financial resources and opportunities that they need.

[REDACTED] is the current Immediate Past President of the North Hills Community Outreach Young Community Leaders Board. The YCLB is an incredibly active group of young professionals that assist NHCO in an important variety of manners and [REDACTED] effectively served as our Founding President. He also serves on our NHCO Strategic Planning Committee, on our NHCO DEI Committee, and now is a Board member as well. In short, he gives dozens of hours to NHCO per

month. [REDACTED] is an active volunteer and has helped harvest fresh produce at the NHCO garden several times and led collections for clients. His breadth of influence makes a difference here at NHCO and beyond in the community.

The efforts of [REDACTED] and his colleagues demonstrates KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. NHCO is a community and interfaith-based organization addressing the needs of people in crisis, hardship and poverty. NHCO annually provides over 30,000+ services to over 3,500 local families in need through implementation of 20 programs across 40 zipcodes and 50 communities. We couldn't do it without partners like [REDACTED] and his KeyBank colleagues.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by holding collections for our food pantries and sharing projects collections. They are also very active at our garden. Our Rosalinda Sauro Sirianni Garden is a volunteer, community-supported organic garden. Over the last three years we served over 4,500 families, and have harvested 5,000 pounds (15,000 total from 2019-2021) of produce. We greatly appreciate KeyBank's efforts. At North Hills Community Outreach, we serve over 1,000 families per year with our three food pantries. We strive to provide the best food we can to our clients. Quality food is often expensive, and so the ability to provide low-income families the opportunity to eat well is the driving force behind the hard work that is poured into the Rosalinda Sauro Sirianni Memorial Garden.

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

If you have questions, please contact me at 412-608-8842 or email me at tjbaker@nhco.org .

Sincerely,

A handwritten signature in black ink that reads "Tom Baker". The signature is fluid and cursive, with the first name "Tom" and last name "Baker" clearly distinguishable.

Tom Baker, Executive Director



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

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 Controller of the Currency (OCC) for 2019 through 2021.

Pittsburgh North Regional Chamber of Commerce is the leading regional voice and advocate for business growth and economic prosperity. We work to create opportunities for business growth through networking, cooperation, advocacy, and education. We have several programs and events that not only stimulate small business growth, but also provide support to nonprofits and the missions of each organization. Our Giving Tree Program during the holidays allows us to provide much needed gifts to underserved individuals in our community while also driving foot traffic to local establishments who support the program by placing tags with wishes in their store, office, and/or building. Our yearly Scholarship Fund is supported through our Second Chance Prom with the entire proceeds of the event going towards scholarships to both 4-year and trade programs, which aligns with our mission of educating and providing future economic and business growth through workforce development. The Farmers Market that is run by our organization is another example of a community driven event that brings prosperity to small, local businesses, as well as, providing a community resource for the region.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammates have supported and currently support The Pittsburgh North Regional Chamber of Commerce by engaging as an active board member, committee participants and Chairs, and volunteers. 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 Sponsoring events that give back to the community, designating an employee to serve on our Board of Directors, encouraging participation and engagement as Chamber members, serving on several committees, and volunteering at events and programs that serve the local region.

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 scholarship funds to those in need, provide much needed essentials and wishes over the holiday season, and help to stimulate economic growth to local, small businesses in various capacities.

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 724-934-9700, ext. 18 or email me at crobson@pghnorthchamber.com.

Sincerely,

Carrie Nolan-Robson

Carrie Nolan Robson

Director of Events and Programs



Rankin Christian Center

Brittney Pepper
President, Board of Directors

www.rankinchristiancenter.org

Darlene McGregor
Executive Director

230 Third Avenue, Rankin, PA 15104-1191
Phone: (412) 271-8313
Fax: (412) 436-2147

March 2, 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:

We are 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.

Rankin Christian Center is a non-profit, faith-based center located in the Mon Valley, east of Pittsburgh. Our purpose is to minister to the physical, social, cultural, and spiritual needs of children, youth and families. Since our founding in 1904, we have taught individuals and families new ways to grow spiritually and emotionally through a variety of program services, including supports coordination for individuals with intellectual disabilities and autism; youth programs for children and teens; a senior citizen program; an advocacy program for tenants in low-income housing; assistance with overdue fuel bills; and a food pantry.

In February, 1979, the Rankin Christian Center developed an innovative scholarship awards program to encourage students of the former General Braddock School District (now the Woodland Hills School District) to pursue a college or trade school education. The program was named after the late Rev. Albert Norman Minney, leading advocate in the Rankin/Braddock area for promoting educational goals and achievement for the African American Community. In 1979, the Rankin Christian Center staff raised a thousand dollars from individual donations, and 10 seniors from Scott High School were the first recipients of this new Financial Aid Program. Since this initial year, well over 1,000 young men and women have received scholarship awards to pursue higher education.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported Rankin Christian Center by engaging as an active board member and volunteer, serving on our board's Finance Committee and also on the committee to oversee our capital campaign that allowed us to renovate unused space in the older portion of our building into a modern workcenter for the staff of our supports coordination program in 2019 - 2021.

Rankin Christian Center is a non-profit organization declared tax-exempt by the federal government under section 501 (c) 3 of the IRS codes and the Commonwealth of Pennsylvania. The official registration and financial information of Rankin Christian Center may be obtained from the Pennsylvania Department of the State by calling toll free, within Pennsylvania, 1 (800) 732-0999. Registration does not imply endorsement. All donations to Rankin Christian Center are tax deductible to the full extent of the law.

Key Bank has also supported our A.N. Minney scholarship program (described above) with its Community Leadership Grants. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

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 us at 412-271-8313 or email us at the addresses below.

Sincerely,



Darlene McGregor, Executive Director

dmcgregor@rankinchristiancenter.org



Susan Harry, Controller

sharry@rankinchristiancenter.org

the pittsburgh promise.

BOARD OF DIRECTORS

February 28, 2023

Franco Harris, *Founding Chair*
1950-2022.

Anne Lewis, *Chair*
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James E. Taylor, Ph.D., *Vice Chair*
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Lisa Schroeder, *Exec. Comm.*
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Babst Calland

Laurie Barkman
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Eric Boughner
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John Hathaway
Primerock Capital

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Exus Management Partners

Vanessa Thompson
PNC Financial Services

Dr. Wayne Walters
Pittsburgh Public Schools

Lisa Witte
Thermo Fisher Scientific

Saleem Ghubril
The Pittsburgh Promise

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

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 Pittsburgh Promise is a hybrid educational and workforce development organization. We collaborate with Pittsburgh Public Schools (PPS) to promote high educational expectations and post-secondary aspirations within urban public schools, provide scholarships to more than 1,500 eligible youth each year to attend university, college, trade, or technical school in Pennsylvania, and invest in our region's workforce by preparing the next generation of diverse and well-prepared young leaders to meet the demands and opportunities of our economy. **Ninety six percent of Promise scholars come from very low to moderate income families, and the majority (51%) are students of color.**

KeyBank has been an engaged partner and has supported The Promise in expanding our region's talent pipeline by making post-secondary education more accessible for more than 11,000 students. KeyBank's support helps to increase the percentage of residents who hold a post-secondary credential, and thereby have the expertise necessary to excel in in-demand career fields that ensure our region continues to thrive. Their support demonstrates a commitment to serving low- and moderate-income communities through philanthropy, community investment, and volunteerism. It also embodies KeyBank's commitment to diversifying our workforce and increasing economic mobility through financial empowerment.

From 2019 to 2021, KeyBank collaborated with us to meet the needs of our community by providing more than \$500,000 of investment in post-secondary scholarships for PPS graduates and other programs designed to improve their workforce preparedness. KeyBank's total financial support for our mission exceeds \$1 million, placing it among our 10 largest supporters. We are also grateful for our longstanding volunteer relationship. [REDACTED], Market President -Western PA, serves as an active member of our Board of Directors, while staff at all levels guide students and offer their expertise at college and career exploration fair events.

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 help us improve educational outcomes for youth while delivering on the promise of an affordable post-secondary education for all. 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 (412) 745-2214 or email me at saleem@pittsburghpromise.org.


With gratitude,

Saleem Ghubril
Executive Director





1735 East Carson St. # 403 Pittsburgh Pa 15203 * 724-205-0752 * www.3rba.com

To: Stanley Poszywak, COO
Examiner-in-Charge, Large Bank Supervision
Key Bank

From: Cynthia Oliver, Executive Director 
Three Rivers Business Alliance

3/1/2023

I represent Three Rivers Business Alliance (3RBA), the Greater Pittsburgh Area LGBTQ+ Chamber of Commerce. 3RBA provides opportunities, access, and resources to LGBTQIA+ business owners and professionals operating in the Pittsburgh/ Greater Allegheny region and their allies. As an NGLCC national affiliate, we are committed to expanding the economic interests of LGBTQIA+ owned and allied businesses through advocacy, education, business development and growth, diversity, leadership, and partnerships throughout our region.

We appreciate the strong support that we have received from the local affiliates of Key Bank. Employees  serves as secretary of our foundation board, and  serves as secretary of our chamber board. Each of them have been active and valued board members contributing both time and resources to program planning and implementation for our members.

In addition, in the past year Key Bank sponsored SOGIE (sexual orientation and gender identity expression) training for 3RBA members and Key Bank staff to provide education and resources to foster a more inclusive and supportive environment for LGBTQ+ employees and customers. Key bank was also a sponsor of our Small Business Pride program which provides resources and marketing materials for communities and organizations looking to host Pride activities and drive business to their business districts. This year we handed out over 1000 physical Pride kits to small businesses. We also were so proud of Key bank in their participation in all Pride activities. They made quite a positive impression with their Key bank volunteer shirts and marching as a cohort in the Pride parade.

In short we can rely upon Key Bank to be first and foremost in supporting all our efforts, attending events and pitching in as volunteers. We are fortunate to have this close partnership and look forward to a continued positive relationship.



February 25, 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.

Berks Latino Workforce Development Corporation (Tec Centro Berks) works toward a greater community free of poverty and economic barriers which provides quality employment and economic equity for all Latinos in Berks County.

KeyBank has been an engaged partner and has supported Berks Latino Workforce Development Corporation in moving Latinos out of poverty by providing self-awareness, education, a pathway for youth, training and workforce development, economic development, and empowerment to create economic wealth and opportunities in the county of Berks. This support demonstrates its 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 funding for ten students to participate in Berks Latino's on-site Phlebotomy training program. Our organization provides this training free of cost to our students and covers the following areas of study; medical terminology, laboratory testing, policies and procedures in maintaining laboratory safety and infection control, the proper methods of requisitioning, specimen transport and specimen processing. Upon completion of this program, our students are prepared to take the National Health Career Association Phlebotomy Technician certification examination.

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 reach our main objective in helping participants reach sustainable living wages and address socioeconomic limitations related to unemployment and underemployment.

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 (484) 513-3344 or email me at emoryv@blwdc.org.

Sincerely,

Violet Emory
Executive Director



March 7, 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.

Reach Up, Inc. is a non-profit that offers services and opportunities to the community. Under the Reach Up, Inc. umbrella are a theses program:

- Food Pantry that services the families of Swissvale, PA, and surrounding communities;
- A Music Workshop that meets weekly encouraging musicians and future musicians to come together to make music. Music lessons are available to anyone who wants to learn to play an instrument.
- A Community Garden that is managed by members of the community and the food grown is available to the community free of charge.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported Reach Up, Inc.'s mission to "empower families, youth, and communities in pursuit of a better quality of life through holistic services and resources," by engaging as an active board member and volunteer. 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 with philanthropic support through its grant program

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 Continue to serve the needs of the community.

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 (412) 271-3900 or email me at jacquelynlewis@msn.com.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lewis", written over a light blue horizontal line.

Jacquelyn M. Lewis, Chairperson
Reach Up, Inc.

3/21/2023

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

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 Rising Tide Community Loan Fund provides accessible financing to business owners whose risk factors make it difficult to obtain funds from traditional lenders. RTCLF serves prospective, start-up, and established businesses in Lehigh, Northampton, Carbon, Monroe, and upper Bucks counties through small business loans for leasehold improvements, purchase of equipment and machinery, marketing costs, working capital, and inventory purchases as well as one-on-one technical assistance on business plans, cash flow analysis and projections, and marketing strategies.

KeyBank has been an engaged partner and has supported Rising Tide Community Loan Fund to identify small business and community development credit needs that stifle the creation of economic opportunity in low-to-moderate-income communities of the Lehigh Valley and to meet those needs with affordable credit products. 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 crucial support in the form of operating and lending funds.

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 prospective, start-up and established small businesses whose risk factors make it difficult to obtain funds from traditional lenders, but who inevitably make up the backbone of a thriving local economy.

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 484-554-3171 or email me at chudock@caclv.org.

Sincerely,



Christopher Hudock

Associate Executive Director for Business Development

March 7, 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

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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 Bucks County Opportunity Council's (BCOC) mission is to reduce poverty and partner with our community to promote economic self-sufficiency. BCOC is the designated Community Action Organization and lead anti-poverty organization in Bucks County, PA. BCOC fights poverty by providing housing assistance including street outreach, short term rental payments and utility assistance. BCOC is also the lead food agency distributing public and private food resources to over 70 pantries, through four free farmers market style programs and home delivery. In addition, BCOC provides work and opportunity for low-income families to leave poverty permanently through its Economic Self-Sufficiency program. BCOC operates the county's Weatherization and LIHEAP programs for low-income households as well as the IRS' VITA program preparing tax returns for low-income families.

KeyBank has been an engaged partner and has supported the Bucks County Opportunity Council to reduce poverty and partner with our community to promote economic self-sufficiency. 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 support for our programs, particularly our Weatherization program which helps makes homes more energy efficient for low-income households by eliminating leaks and drafts in their dwellings.

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 serve people in a variety of ways. BCOC helped fixed 13 houses during that time with Key Bank funds. In addition, Key Bank helped BCOC serve over 50,000 individuals during the pandemic with some unrestricted funding.

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 215-345-8175 x 204 or email me at jcuozzo@bcoc.org.

Sincerely,



Joseph S. Cuozzo
Director of Development



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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CommonBondz, Inc. (www.CommonBondz.org) mission is to educate people about what drives racism and bias against African Americans, and what actions we all can take to drive greater equity in our society. Our education programs are in the areas of health, wealth, employment and housing, and address real-time society issues and how people can take responsibility for addressing these issues to ensure equity and fairness for everyone.

KeyBank has been an engaged partner and has supported CommonBondz in a number of educational and leadership areas, demonstrating 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 in a number of ways. KeyBank was a major financial sponsor of the revitalization of Willow Knoll Community Park (renamed DocterAdams Community Park), a Low-to-Moderate (LMI) income community in Warrington, PA. KeyBank also is the lead sponsor of our CommonBondz Speaker Series events, which focus on topics of education and action for our followers. KeyBank leadership team members are regular contributors to these events as expert panelists and moderators.

KeyBank is also partnering with CommonBondz in creating and delivering a Financial Literacy Education program to the students and parents of Olney Elementary school in Philadelphia, PA (also an LMI community). The program will focus on financial understanding for students from 3rd-8th grade and a separate program for their parents to learn more about credit, home ownership, savings and retirement.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities is clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to deliver on our CommonBondz mission of education, action and responsibility.



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 267-784-2557 or email me at miked@commonbondz.org.

Regards,

Mike DeCandido
Co-Founder and Board Chair
CommonBondz, Inc.
www.commonbondz.org
C: 2677842557



1156 West Baltimore Pike
Post Office Box 394
Kennett Square, PA 19348
Phone: 610-444-0400
www.familypromisescc.org
www.info@familypromisescc.org

2/27/2023

Stanley Poszywak, OCC Examiner-in-Charge
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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.

Family Promise of Southern Chester County (FPSCC), a 501(c)(3) non-profit organization, was created to address the growing concern for families with children experiencing homelessness in the communities defined by the five Southern Chester County school districts: Kennett Consolidated, Avon Grove, Oxford, and Unionville-Chadds Ford. Indicative of this concern is the fact that even now, the PA Department of Education reports that approximately five hundred students had experienced some form of homelessness in our community during the 2019 – 2020 school year. KeyBank has been an engaged partner and has supported FPSCC to ensure that every child deserves a home. This support demonstrates its 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 awarding FPSCC a charitable grant from KeyBank Foundation in the amount of \$300,000 payable over three years. In the Promise House program, FPSCC rents apartments from landlords to be used as emergency housing. The Promise House allows families to stay in housing for up to ninety days. During this time, a FPSCC case manager works with families to establish and address goals, including gaining or improving employment, household budgeting/financial literacy, securing permanent housing, and connecting to entitlements (i. e. childcare, housing subsidies, food stamps, health care). Families also receive life skills training, such as how to utilize public transportation, improve their credit and financial situation, and build social networks, helping them to break the cycle of poverty and homelessness. With KeyBank Foundation's funding, FPSCC will be able to hire an additional case worker to assist more families as well as expand the Promise House program to five apartments in the Kennett Square area to house even more families on an emergency basis.

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 610-444-0400 or email me at ed@familypromisescc.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol M. Lowe", written over a large, stylized flourish that extends to the right and loops back under the signature.

Carol M. Lowe, MSW, LSW
Executive Director



February 27, 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:

On behalf of KeyBank, I would like to offer this information for their Community Reinvestment Act (CRA) Exam conducted by the Office of the Comptroller of the Currency (OCC) for 2019 through 2021.

Since 1994, Genesis Housing Corporation, a 501(c)(3) non-profit organization, has served Montgomery County PA and, the surrounding counties, as a community housing development organization (CHDO). Genesis Housing Corporation is dedicated to the development of affordable housing, the revitalization of neighborhoods and to the education of consumers on housing and financial issues.

KeyBank has supported Genesis Housing Corporation's work to rehab homes to provide safe and decent housing for lower income households and to improve low income neighborhoods. In 2021, KeyBank supported our Pottstown Facade Program to improve the overall appearance of low income neighborhoods, address safety concerns and reduce lead paint. KeyBank's relationship with Genesis Housing has continued to grow and in 2022, KeyBank became our partner for the Pottstown Neighborhood Project. The Pottstown Neighborhood Project is an ongoing neighborhood tax credit program that includes the rehab of blighted properties, the rehab of owner occupied homes, facade improvements, social justice programs, community clean-ups, housing counseling and community events like National Night Out.

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 respond to community needs and helped us to offer a wide range of programs. 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 would like additional information, please call 610-275-4357 or email me at jmemberg@genesishousing.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Judith S. Memberg", with a long, sweeping underline.

Judith S. Memberg
Executive Director

Via email to CommunityAffairs@occ.treas.gov and KeyBank at cra_comment_letter@keybank.com

March 7, 2023

BOARD OF DIRECTORS

Gary Pruden, *President*
JNJ Medical Devices (retired)

Stacey Mulholland,
Vice President
Wrightstown Township

Eric Seidman, *Treasurer*
Wouch, Maloney & Co., LLP

Anu Hans, *Secretary*
Johnson & Johnson

Terry Clemons, Esq.
Clemons, Richter & Reiss, P.C

Lewis Cyr
Penn Community Bank

Anthony DaCosta
Univest Bank & Trust Co.

Bill Donahue
William H. Donahue Appraisals

Dave Freeman
QNB Bank

Judy Stern Goldstein
Gilmore & Associates, Inc.

Liz Graham
Community Representative

John Mahony
Community Representative

Chris Smylie
PARX

Sean Torpey
Pennoni

Michael Wilson
Community Representative

Sheila Wilson
Coldwell Banker Hearthside

EXECUTIVE DIRECTOR
Florence Kawoczka



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.

Habitat for Humanity of Bucks County works to build homes and empower families. Better, affordable living conditions lead to improved health, stronger childhood development, and the ability – and financial flexibility – to make forward-looking choices. Since our founding in 1990, Habitat Bucks has helped more than 125 families achieve their dream of affordable homeownership through our core Homeownership Program. Educational programs prepare homebuyers for homeownership and successfully reaching their financial goals. Our Home Repair Program preserve existing homes, providing improved access and critical and safety repairs. And our ReStores provide an avenue where gently-used donated goods are diverted from landfills and into homes where they can be useful.

KeyBank has been an engaged partner and has supported Habitat Bucks in these initiatives. 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 direct philanthropic support for our homebuyer education program and the construction and renovation of five homes. Key's partnership and engagement have allowed HabitatBucks to be responsive to community needs and helped us to assist Bucks County, PA families in achieving strength, self-reliance, and stability.

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 215.822.2812 x308 or f.kawoczka@habitatbucks.org.



Florence Kawoczka
Executive Director

Building Communities, Empowering Families

HabitatBucks.org



We build strength, stability, self-reliance, *and* shelter.

February 27, 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.

Habitat for Humanity Philadelphia's (HFHP) mission is to transform lives and our city by building quality homes in partnership with families in need and by uniting all Philadelphians around the cause of affordable housing. Our vision is a city where all Philadelphians live in safe, affordable homes. Through the Homeownership Program HFHP partners with low-to moderate income families through all stages of the housing process from construction until the mortgage is paid off. Through the Home Repair Program HFHP also provides critical home repair services to help keep existing homeowners sheltered safely and leads a neighborhood revitalization strategy that seeks to enhance community cohesion and civic behavior. While we operate city-wide, the bulk of our work has been targeted in West and North Philadelphia in diverse communities that are typically not included in local, state, or federal investment. KeyBank has been an engaged partner and has supported HFHP in our mission to improve access to affordable housing for Philadelphia residents through funding for our Homeownership Program and Home Repair Program for over a decade. 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 the provision of a \$10,000 grant awarded to HFHP's Home Repair Program to conduct critical home repairs in the communities of Mantua, Belmont, and Sharswood. 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 expand the scope and impact of our services to improve housing opportunities for hundreds of Philadelphians. 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 215-765-6000 or email me at iane@habitatphiladelphia.org.

A handwritten signature in cursive script, appearing to read "Ian Eichen".

Ian Eichen
Grants Manager



Driving hunger from our communities

Feb. 27, 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.

Philabundance works to bridge the gap between people who go hungry and healthy food going to waste. Philabundance provides over 52 million pounds of food and 400,000 ready-to-eat meals reaching 600 agency partners. In addition to food distribution, we reduce food waste, increase access to nutritious meals, and tackle the root causes of hunger through programs such as the Philabundance Community Kitchen.

KeyBank has been an engaged partner and has supported **Philabundance to drive hunger from our communities today and end hunger for good.** 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 to support the work of Philabundance for COVID-19 Emergency response, the Galloway Hub food distribution, and WMMR Camp Out for Hunger Event – the nation's largest single site food drive.**

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 **purchase food for the over 135,000 people in our nine-county service area.**

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 **267-876-5328** or email me at kdelmonte@philabundance.org.

Gratefully,

Kristine DelMonte
Director of Corporate Relations

3616 South Galloway Street, Philadelphia, PA 19148
(p) 215.339.0900 (f) 215.339.0924 www.philabundance.org

A Member of





THE ENTERPRISE CENTER
BUSINESS | CAPITAL | COMMUNITY

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 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 Enterprise Center's (TEC) mission is to cultivate and invest in minority entrepreneurs to inspire working together for economic growth in communities. TEC approaches its mission by accelerating the capacity of minority enterprises to compete in any marketplace through business education, access to capital, management support, and connections; by providing debt and equity capital that businesses need to start, grow, and succeed; and by catalyzing benefits for businesses and residents that spark community revitalization.

KeyBank has been an engaged partner and has supported TEC in our activities to build the capacity of minority entrepreneurs. 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. KeyBank recently awarded TEC a grant for \$15,000.00 in support of the Norristown Small Business Services Center (NSBAC) which TEC has operated for the past 10 years. NSBAC works with entrepreneurs who are in the ideation and early stages of developing a business in the Municipality of Norristown.

KeyBank's commitment, partnership, and engagement have allowed us to be responsive to community needs and helped us to deepen our engagement and provision of services for minority entrepreneurs.

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 215-895-4005 or email me at dclark@theenterprisecenter.com.

Della Clark
President & CEO

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 and KeyBank

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. Uplift Solutions provides education, training, career, barrier removal and job placement services to returning citizens and facilitates. This funding will enable Uplift to expand its workforce development offerings and implement new programs that respond to the local labor market demands and provide returning citizens with access to jobs that offer family sustaining wages.

KeyBank has been an engaged partner and has supported Uplift Solutions to reduce the barriers for justice involved individuals and at-risk youth, helping them find pathways to long-term success. 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 in a variety of ways. They are a partner we can count on to support the wide range of programming and activities Uplift offers its participants and communities across Philadelphia.

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 returning citizens in their efforts to successfully accomplish reentry, obtain employment and make meaningful contributions to society.

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 Julia.keleher@upliftsolutions.org

Julia Keleher
Chief Operating Officer
Uplift Solutions

Julia B. Keleher, Ed.D., MBA, PMP
Chief Program Officer
julia.keleher@upliftsolutions.org
(c) 202-322-7373

[Booking & Availability](#)



Website: www.upliftsolutions.org

Facebook: www.facebook.com/upliftsolutions

I sometimes send emails outside of office hours for my convenience; please reply at your convenience during your usual working hours.

March 7, 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.

The American Red Cross of the Greater Pennsylvania Region helps people to prepare for, respond to, and recover from disasters big and small. Each year we provide assistance following more than 2,200 area disasters, most of which are home fires. We also collect life-saving blood; support our veterans and active duty, reserve, and National Guard members and their families; and provide life-saving training such as first-aid and CPR to the community.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported our Region by engaging as an active board member and volunteer in events such as installing smoke alarms in vulnerable communities through our Home Fire Campaign. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

In addition to the aforementioned, from 2019 to 2021, KeyBank has financially supported our annual fundraiser, Power of Red, which help us fund our critical life-saving work.

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 respond to local disasters big and small.

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 (216)925-3071 or email me at Jorge.Martinez5@redcross.org.

Sincerely,

Jorge Martinez



Regional Chief Executive Officer

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 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.

Evergreen Real Estate Group, LLC works to improve American's lives by adding to, rehabbing and preserving affordable housing throughout the United States. Our company services over 30,000 residents in 110 properties across 12 states. We typically work on 10+ new projects annually and Key Bank is a partner in many of those projects. Every decision we make is use with the filter of "are we improving lives" with our work.

KeyBank has been a critical and engaged partner and has supported Evergreen Real Estate Group to help us fulfill our mission of "improving lives through 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 bridge and permanent lending to our affordable housing projects and being strategic and creative partners to solve problems to bring our mission-oriented projects to fruition.

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 work on important project to provide safe, affordable housing to those in need throughout the United States of America.

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 312-382-3222 or email me at srappin@evergreenreg.com

Stephen Rappin

Chief Executive Officer



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 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.

Familylinks' mission is to positively impact lives through integrated community, behavioral and social programming. Annually, we have a budget of \$25-\$27 million dollars in operations, approximately 330 staff and serve nearly 9000 clients per year in four unique but connected service lines that are described below.

We know that KeyBank encourages its teammates to provide expertise through volunteerism and board service. We have been fortunate to have one of KeyBank's employees on our Board for the last year. During this time, he has been an active board member and volunteer. Examples of this include connecting Familylinks to the KeyBank Foundation to support the work we do in our Young Adult Shelter in Pittsburgh – the only shelter resource in the area dedicated to the unique needs of youth experiencing homelessness. This individual has also been a valuable voice at the Board table as a Director at Large and through active participation on our Investment Committee.

We are pleased to have had a member of KeyBank join Familylinks by serving on the Board of Directors and look forward to our continued involvement with KeyBank in Board Service and our work with the Foundation. Additionally, KeyBank has been a participant in, and sponsor of, our annual golf outing which raises monies for Familylinks' operations.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Whether through Board Service or philanthropic support, KeyBank has allowed Familylinks to continue our mission and move toward our vision of *thriving communities of health and strong people*. We have a genuine commitment to the people we serve, and KeyBank offers us both the expertise and financial support to continue that legacy.

If you have questions, please contact me at 412.942.0411 or email me at svaccaro@familylinks.org.

Sincerely,

Stacey Vaccaro, FACHE
President & CEO



More information about the work of **Familylinks**:

- Familylinks **Youth and Family Services** includes residential shelter and step-down services for youth in 9 locations, as well as our homelessness and homelessness prevention programs. Familylinks residential programs are located throughout Allegheny County and serve youth that are progressing through a treatment model but may not yet be ready to safely return to their permanent home placement. Our programs for individuals experiencing or at risk for homelessness include the following :: NOVA – Temporary Rental Assistance for individuals that are involved with CYF and are unstably housed; ARIA – Rapid Rehousing Model for individuals that are involved with CYF and have drug or alcohol history and are unstably housed; Community Housing Program – Permanent Supportive housing for individuals that are street homeless with a disability (physical, mental health or alcohol and other drugs); Downtown Outreach Center & Shelter – serving youth ages 18-25 experiencing homelessness as a drop-in shelter; Housing First model; medical services on-site.
- Familylinks provides services for individuals with **Behavioral Health** needs on an outpatient basis at locations on Banksville Road and in Shadyside. Behavioral health services are also provided in the community through Mobile Mental Health Treatment and Family-Based Mental Health programs and in schools through School-Based and Therapeutic Classroom Models. In the Behavioral Health service line Familylinks also provides services for individuals in need of drug and alcohol treatment on an outpatient basis at the same locations where behavioral health outpatient services are provided, and on an inpatient/residential basis for women who are continuing their recovery after detoxification. The inpatient program also allows two children under the age of 12 years to accompany each woman in recovery. Our behavioral health and drug and alcohol programs also support the community through prevention work and education.
- A **Service Coordination** Entity (SCE) which provides community based, person-centered, independence-focused, planning, sourcing, coordinating, and monitoring supports and services for individuals with intellectual disabilities of any age. Familylinks also provides care management for older adults ensuring flexible, participant centered supports for older adults interested in aging in their homes and communities. While a small part of our SCO, Familylinks does provide Administrative Service Coordination for Children and Adolescents which assists families and caregivers navigate the behavioral health system for their children.
- Familylinks provides **Aging Services** which are anchored through our Senior Center called *Vintage* located in East Liberty. Vintage affiliated with Familylinks in 2015 to ensure its ability to provide services long into the future and has benefited from the ability to take advantage of the scale of administrative services that Familylinks can offer including Information Technology, Finance, Accounting, Human Resources, Compliance, Facilities Services and Strategic support. Vintage is the busiest senior center in Allegheny County and has achieved National Senior Center Accreditation through the National Institute of Senior Centers (NISC) – a designation that can only be claimed by 2% of all senior centers across the country!



**Focus On Renewal
Sto-Rox Neighborhood
Corporation**
420 Chartiers Avenue
McKees Rocks, PA 15136
412.331.1685
412.771.4150 Fax
forstorox.org

EXECUTIVE DIRECTOR
Cynthia L. Haines

BOARD OF DIRECTORS
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Tracey L. Lewis
Janetta Mixter
Lydia Morin
Anthony Reynolds
Michael E. Wallace
Derrick Wilson

Fr. Regis Ryan
Director Emeritus

February 21, 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.

For over 50 years, Focus On Renewal has worked towards its Mission to provide programs and partnerships to connect children, adults, and families with the relationships, resources, and opportunities needed to develop and sustain a thriving community. Specifically, Focus On Renewal provides food and nutrition services, Critical Needs funds to provide community members with emergency assistance, housing support assistance including first-time home buyer workshops, numerous services for children and families through our Family Foundation and Early Head Start, Positive Parenting McKees Rocks Family Center, and our Sto-Rox Public Library and Father Ryan Arts Center. Most recently, we have begun initiatives to address community violence.

KeyBank has been an engaged partner and has supported Focus On Renewal. 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 support for our fundraising efforts in the amount of \$2,000 and for our COVID safety initiatives in the amount of \$15,000. During this time, KeyBank has also helped us meet the needs of our community members by providing information and education stations at community events we coordinate.

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, educate our community members, and helped us to continue working towards our mission

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 412-477-7502 or email me at chaines@forstorox.org.

Sincerely,

Cynthia L. Haines
Executive Director
Focus On Renewal

FOR resources

- ▶ Community Resource Center
- ▶ Food Pantry
- ▶ Critical Needs

FOR children and families

- ▶ Family Foundations
- ▶ Early Head Start
- ▶ Positive Parenting McKees Rocks Family Center

FOR community

- ▶ Sto-Rox Public Library
- ▶ Arts Programs at Father Ryan Arts Center

NEIGHBORHOOD ALLIES

March 22, 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.

Neighborhood Allies works to engage Pittsburgh area residents and organizations with innovative tools that expand opportunity for transformative community change. Our vision is for all neighborhoods to be resilient, thriving, and equitable. Neighborhood Allies offers a suite of programs and initiatives that provide a range of services and resources to help revitalize neighborhoods, foster economic opportunity, build capacity, and advance equity across Pittsburgh. Programs include the Centralized Real Estate Accelerator, Digital Inclusion, Economic Opportunity, Social Impact Design, and Black mental health services through Steel Smiling.

KeyBank has been an engaged partner and has supported Neighborhood Allies in furthering our 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 providing generous philanthropic support. In 2021, the KeyBank Foundation awarded Neighborhood Allies \$400,000 to advance economic opportunity for people of color and under-resourced communities. This money has been used to implement partnerships with Allegheny County and the City of Pittsburgh to bring financial counseling to emergency rental assistance recipients and entrepreneurs, create investment clubs for Black women, offer credit building products, expand youth banking initiatives, connect entrepreneurs of color with financial counseling to build personal credit and savings, and to make equity a priority. Additionally, in 2020 KeyBank supported our direct COVID-19 neighborhood financial relief efforts.

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, helping us pursue our North Star Goal of moving 100,000 low-income Pittsburghers up the socio-economic ladder!

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 412-471-3727 x213 or email me at presley@neighborhoodallies.org.



Presley L. Gillespie
President & CEO

429 Fourth Ave Suite 1900, Pittsburgh, PA 15219

p: 412.471.3727 f: 412.471.3746

neighborhoodallies.org  [neighborhoodallies](https://www.facebook.com/neighborhoodallies)  [NHBDalliespgh](https://twitter.com/NHBDalliespgh)



NeighborWorks®
Western Pennsylvania

1901 Centre Avenue
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T 412.281.9773

www.neighborworkswpa.org

February 23, 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.

NeighborWorks Western Pennsylvania (NWWPA) is a HUD-certified housing counseling and education agency serving first-time homebuyers at all stages of purchase readiness and homeowners at risk of foreclosure. In 2020, NWWPA articulated a core focus on increasing Black homeownership. Credit and cash to close serve as major barriers for low- and moderate-income (LMI) prospective homebuyers and particularly to buyers of color who have had inequitable access to homeownership opportunities due to segregation, redlining, lending discrimination, and other forms of systemic racism. To help make homeownership more affordable and attainable to those who have historically faced barriers, in early 2021, NWWPA launched a down payment and closing cost assistance program serving buyers across Western Pennsylvania.

KeyBank has been an engaged partner and has supported the NeighborWorks Western Pennsylvania mission to promote stable, vibrant communities by providing our neighbors with comprehensive homeownership services. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism. KeyBank's ongoing commitment has allowed NeighborWorks to realistically envision a future in which homeownership is affordable and attainable for those who have historically faced barriers and injustice.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing philanthropic support each year (\$50K in 2019; \$15K in 2020; \$50K in 2021). In 2019, the support allowed the organization to convene multiple 8-hour homebuyer education workshops (59 unduplicated participants), 90-minute financial wellness workshops (43 unduplicated participants) and conduct 81 individual financial coaching appointments. In 2020, KeyBank support allowed NeighborWorks to launch virtual counseling and education platforms in which 100% of our customers were engaged during the early stages of the Covid pandemic. In 2021, support from KeyBank provided the organization with the resources to hire a full-time Community Engagement Specialist, a key position in our strategy to expand the reach of our down payment assistance loan program and increase black homeownership throughout the Pittsburgh region.



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 deliver services and positively impact LMI and minority populations that have faced decades of systemic and institutional racism in the pursuit of homeownership.

We look forward to continuing our partnership with KeyBank as we work together to meet the needs of our community. This will be achieved through ongoing financial support and the numerous professional relationships established since KeyBank entered the western Pennsylvania market in 2016. The bank was represented on the NeighborWorks Western Pennsylvania board in 2018-2019 and continues this representation currently with the election of KeyBank Vice President Community & DEI Relationship Manager [REDACTED] in 2022.

If you have questions, please contact me at 412-281-9773 or email me at ckelley@neighborworkswpa.org

Colin Kelley

A handwritten signature in cursive script that reads "Colin Kelley".

Chief Executive officer

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 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 2022-2023.

Multiplying Good's mission is to fuel personal growth and leadership through service to others. We unleash leadership potential in youth through service to others. We partner with organizations to recognize their employees, resulting in happier and more productive workplaces and stronger communities. We work with the media to create more connected audiences and drive non-traditional revenue by recognizing grassroots unsung heroes in their communities. We work with professionals making positive impact in their communities and celebrate their achievements so that others may also be inspired to act. All together, we use the power of service to activate empathetic leaders and changemakers and inspire greater impact through recognition.

KeyBank encourages its teammates to provide expertise through volunteerism and board service. Their teammate has supported Multiplying Good Pittsburgh to elevate service to others by engaging as an active board member and volunteer. This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

Since 2022, KeyBank has worked with us to meet the needs of our community by providing philanthropic support, board participation/volunteering, community representation for our youth, and leadership in our communities by engaging in programs that train, engage, and empower youth, employees, community volunteers, and rising professionals in servant leadership.

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 engage diverse members of our Students In Action and ChangeMakers programs across the 10 county region of southwestern Pennsylvania.

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 412-440-7157, or email me at jklebick@multiplyinggood.org

Jodi S. Klebick

Executive Director - Pennsylvania