

From: Chris Donnelly <Chris.Donnelly@champlainhousingtrust.org>
Sent: Tuesday, February 21, 2023 1:46 PM
To: CommunityAffairs@occ.treas.gov
Cc: CRA Comment Letter
Subject: KeyBank's CRA Examination

WARNING: This email originated externally. Exercise caution. Think before clicking links or opening attachments.

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 **

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.

Champlain Housing Trust works to address the housing needs of low and moderate income households, primarily in northwest Vermont. To do this, we are an active developer of new housing, we deliver services to people experiencing homelessness, manage over 2,500 affordable apartments, steward 670 permanently affordable owner-occupied homes, provide loans for those unable to access traditional products and help people improve their financial literacy.

KeyBank has been an engaged partner and has supported Champlain Housing Trust to carry out our mission and vision of affordable and inclusive communities throughout our service territory. 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 supporting our efforts to address chronic homelessness in the State's most populous county, Chittenden County. KeyBank provided us with a three-year, \$240,000 grant to increase our social work staff to support unhoused community members. During this period, with KeyBank's support, we helped over 200 households exit homelessness into permanent housing. KeyBank's commitment to our work at a time where we were being asked to do even more gave us confidence that we could succeed.

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 our efforts in the midst of the Covid-19 public health emergency. They stepped up voluntarily and made an early payment on the final installment of the grant near the outset of the pandemic knowing that the future was uncertain for organizations like our who were on the front line of response. That's what a good community partnership looks like.

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 802 862-6244 or email me at chris.donnelly@champlainhousingtrust.org.

Thank you,

Chris Donnelly (*he, him*)
Director of Community Relations
Champlain Housing Trust

(802) 861-7305 direct
(802) 310-0623 cell
(802) 862-6244 main

88 King Street
Burlington, Vermont 05401

[Web](#) / [Facebook](#) / [Twitter](#)

DISCLAIMER:

The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.



60 Main Street, Suite 100
Burlington, Vermont 05401
802-863-3489
lccvermont.org

March 9, 2023
Stanley Poszywak
OCC Examiner-in-Charge
Large Bank Supervision
Office of the Comptroller

Dear Mr. Poszywak,

I am writing to provide feedback in relation to KeyBank's community responsiveness.

The Lake Champlain Opportunity Fund promotes leadership development, entrepreneurship, and economic and talent development in the State of Vermont, and the Lake Champlain region, for the benefit of our community. The Lake Champlain Opportunity Fund was established in 1999 as a 501c3 non-profit and is a subsidiary of the Lake Champlain Chamber.

KeyBank has been a partner of the Lake Champlain Opportunity Fund for a number of years. One of the greatest contributions KeyBank has made to the Lake Champlain Opportunity Fund is through a program called LaunchVT. LaunchVT began in 2013 to support entrepreneurs with a goal of creating high value jobs in Vermont. In the past 10 years, LaunchVT has evolved into an accelerator of outstanding, early-stage, Vermont-based startups that provide world-class business curricula, networking, and industry-specific mentorship to help these ventures scale. 43% of our founders are female or founders of color.

Our strategic community partnerships fuel the future of Vermont's entrepreneurship ecosystem. KeyBank has provided significant philanthropy to help us maintain and grow this work. KeyBank has also provided expertise to our staff that has helped us improve our programming in order to create more opportunity for the startups we accelerate. By creating high value jobs we provide greater economic opportunities for all Vermont residents.

Creating high value jobs is critical to Vermont's future and KeyBank's support for this initiative shows both their focus on our community needs as well as a desire to invest in our community's future.

Please feel free to contact me if I can provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "CZ Davis", written in a cursive style.

Catherine Z. Davis
President



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.

Mercy Connections is an adult education, community-based organization working to lift people out poverty through education, mentoring, entrepreneurship and community. We offer many programs aimed at adults seeking to better their lives. Our organization was established when Trinity College closed in 2000 to provide education and support for the most underserved Vermonters.

KeyBank has been an engaged partner and longtime supporter of **Mercy Connections**. **Specifically, it has been committed to the Inclusive Entrepreneurship Program which helps to prepare low-income women+ own and operate businesses. Key Bank also supports Mercy Marketplace, a microenterprise program that teaches makers, crafters, and others how to sell their products in a market setting. The goal of these programs is to build financial capacity as well as to encourage confidence and stability in people's lives.** This support demonstrates its commitment to serving low- and moderate-income neighborhoods through philanthropy.

From 2019 to 2022, KeyBank clearly demonstrated its commitment to serving low and moderate- income neighbors by granting Mercy Connections \$28,000 in grant funding. Also, [REDACTED] and other Key Bank employees served as thought partners while we were forced to reimagine our services during the pandemic. We also had employees volunteer in our Start Up class. Key's partnership and engagement have

255 South Champlain St.
Burlington, VT 05401

(802) 846-7063
mercyconnections.org



allowed us to be responsive to community needs and helped us to grow the Vermont economy and improve the financial stability of Vermonters even during a difficult period.

I am so grateful to our partnership with KeyBank and look forward to future work together meeting the needs of our community. If you have questions, please contact me at 802-846-7062 or email me at lfalcone@mercyconnections.org.

Sincerely,

A handwritten signature in blue ink that reads 'Lisa Falcone'.

Lisa J. Falcone

Executive Director

255 South Champlain St.
Burlington, VT 05401

(802) 846-7063
mercyconnections.org





February 28, 2023

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

Via email to CommunityAffairs@occ.treas.gov 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.

Spectrum Youth & Family Services was founded in 1970 as a community shelter for runaway youth and is nationally recognized for its work to help youth with housing, employment, education, mental health and substance abuse issues, and life skills. Spectrum's efforts include direct services for youth and families, prevention, education, and outreach activities, and community-wide leadership and advocacy on policies that improve Vermont's social safety net and help to ensure that the needs and voices of at-risk youth are included when public priorities are set.

KeyBank has been an engaged partner and has supported Spectrum Youth & Family Services to Multicultural Youth Program, which works with youth whose families arrived in Vermont as refugees or who identify as youth of color, providing basic needs, academic support, and help planning life after high school. 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 contributed \$21,870 to support our work in the community, and also participated in our annual Spectrum Sleep Out, where KeyBank employees sleep outside overnight in solidarity with youth who are homeless and raise funds to support them.

KeyBank's commitment and actions to serve the needs of low- and moderate-income communities are clear. Key's partnership and engagement have allowed us to be responsive to community needs and helped us to make sure teens and young adults facing significant challenges can get help when they need it most.

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 (802) 864-7423 x350 or email me at swoodard@spectrumvt.org.

Sarah Woodard
Chief Development & Communications 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.

The Boys and Girls Club of Burlington works to inspire and enable community youth, especially those who need us most, to realize their full potential as productive, healthy, responsible, and caring citizens. Each year, we work with over 500 children and teenagers in grades K-12 and beyond, providing equitable access to enriching and structured afterschool support. The vast majority of the youth we serve come from households living in poverty or families from historically underserved backgrounds. The Club offers a range of initiatives designed to help these vulnerable young people navigate the challenges in their lives, including daily academic support, free meal and snack programs, individual mentoring, organized sports and informal recreational activities to keep youth healthy, and more.

For years now, KeyBank has been an engaged partner and key supporter of the Club's efforts to ensure that every young person in our community has a safe, structured, and compassionate space while outside of school. This support is just one example of KeyBank's commitment to serving low- and moderate-income neighborhoods through philanthropy, lending, investments, products, and volunteerism.

From 2019 to 2021, KeyBank has worked with us to meet the needs of our community by providing financial support to the programs that have been demonstrated to a profoundly positive impact on vulnerable young people in our neighborhood. Between 2019 and 2021, KeyBank contributed \$25,000 in grant support to the Club's Early Promise academic improvement program, as well as \$2,500 of funding in support of the emergency food distribution the Club created in response to the COVID-19 pandemic.

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 the youth we serve to a viable path to completing a post-secondary education and going on to achieve economic independence as adults.

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 (802) 864-4496 or email me at tbenosky@bandgclub.org.

Tanya Benosky, Executive Director
Boys and Girls Club of Burlington



World Learning

EDUCATION | DEVELOPMENT | EXCHANGE

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.

For over 90 years, World Learning, Inc. has worked to create a more sustainable, peaceful, and just world. Our education, development, and exchange programs support young leaders around the world, connect them with their communities, strengthen those institutions that form the backbone of a democratic society, and build relationships across cultures. With our support, these emerging leaders tackle critical global issues like poverty, conflict, and inequality. The Experiment in International Living (The Experiment) is the flagship of our global nonprofit organization with education, global development, and exchange programs including participants from more than 150 countries. Participating in The Experiment is only the beginning of lifelong opportunities to engage with this global network, all while fueling students' purpose-driven passions.

KeyBank has been an engaged partner of World Learning, Inc. and The Experiment through its support for 36 need-based scholarships for high school students from specific geographic locations and schools to participate in our 2019, 2020, and 2021 summer abroad programs. Through its philanthropic partnership with our organization, KeyBank has demonstrated its commitment to investing in young leaders from low- and moderate-income neighborhoods. KeyBank's partnership and engagement have allowed us to respond to community needs and make study abroad experiences accessible for students who otherwise may not have the chance.

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 703-395-2791 or email me at cristina.blough@worldlearning.org.

Gratefully,

Cristina E. Blough
Director of Corporate & Foundation Partnerships
World Learning, Inc.
Cristina.blough@worldlearning.org
703-395-2791

World Learning

1015 15th Street NW, 9th Floor
Washington, DC 20005
P: 202.408.5420
F: 202.408.5397

info@worldlearning.org
worldlearning.org

RECEIVED 2023

DEC 27 2023

OFFICE OF THE
COMPTROLLER OF THE CURRENCY

Dear Key Bank Administrator:

I have made my car loan payments on time for three years including Oct 2023. However, Key Bank closed your [redacted] office w/out notifying us and failed to forward the Bank's mail to the main office or another branch office. But what you did was charge a late fee for any loan that was caught in your closure. This created all sorts of problems for your customers. We have written 2 letters this is the third and called your problem line; you have refused to solve the problem.

We have been charged a late fee of [redacted] you have damaged our credit rating, and made money off your mistake for failure to properly close your branch office. How many people were made to pay late fees?; 10, 100, 1000, or 10,000 customers.

I expect that you will do the right thing and correct the injustice that you have caused. I have contacted the Office of the Controller of the Currency; they have asked that I tried to work w/ your Bank to resolve this issue. Having written three letters and called your problem telephone line which your Bank Ignored and refused to acknowledge. I am proceeding w/ my next course of action if you fail to correct this situation.

1. Return my Late Fee [REDACTED].
2. Correct any damage you have done to my credit reports
3. Notify any other customers that have been caught in the same situation. Where the bank failed to notify them of the bank ~~closure~~^{closure} and failure to forward mail at the post office to the main branch or another branch. Including, returning late fees and damaged credit reports.

I am an average American Citizen who makes every attempt to pay his bills on time and repays his debts. I expect no less from you. All of my correspondence has been sent certified mail.

Respectfully,

[REDACTED]

[REDACTED]

Copies to:

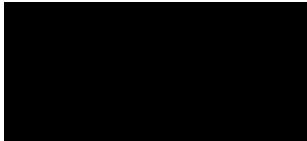
- The office of the controller of the Currency
- Senator Pete Welch of Vt.
- AARP
- Senator Elizabeth Warren

Someone will care and take an action



KeyBank
Enterprise Client Relations
127 Public Square
Cleveland, OH 44114

January 29, 2024



Re: [REDACTED]
OCC Case No. CS0303413
KeyBank Case No. 2JU8U7

Dear [REDACTED]:

We received your complaint that you filed through the Office of the Comptroller of the Currency (OCC) regarding your Loan payment that was mailed to KeyBank's [REDACTED] branch after its closure. We regret the frustrating experience you've had and would like to share the results of our review.

KeyBank offers various means of remitting payments for your Loan such as by phone and through Online Banking, which are listed on page 3 of the Loan's monthly billing statements. To ensure proper and timely posting, we kindly recommend that any payments by mail be sent to the address listed on those statements:

KEYBANK
PO BOX 94722
CLEVELAND, OH 44101-4722

As reflected on the enclosed statement for the Loan dated October 12, 2023, no payment had been received by the preceding due date, and the Loan was past due an amount of [REDACTED], and a late charge of [REDACTED] was assessed. You reported to KeyBank a check payment had been mailed to our [REDACTED] branch. However, the branch had closed on September 15, 2023. Though signage was posted, and impacted clients who held accounts with the [REDACTED] branch were notified by mail, your Loan, as an indirect loan, did not have any correspondence sent regarding the closure.

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

Like any other business, KeyBank continually reviews the structure of its organization to maintain a strong position in the marketplace and remain profitable while continuing to serve the financial needs of

our clients. The decision to close or consolidate a branch may be based on decreased client foot traffic due to increased online/mobile banking usage and/or proximity to another KeyBank branch.

As a courtesy, when you brought the Loan current on October 20, 2023, we backdated a payment of [REDACTED] to the date of September 27, 2023, which was the date written on the check mailed to the [REDACTED] branch. As the late charge had already been paid, its amount of [REDACTED] was instead applied to the Loan's principal balance. These adjustments are reflected on the enclosed full payment history for the Loan, as well as its monthly statement dated November 12, 2023. Going forth, we kindly ask that any mailed payments be mailed to the address on the Loan's statements.

Please be advised that KeyBank complies with the provisions of the Fair Credit Reporting Act (FCRA), which prohibits furnishing any information related to a consumer that KeyBank knows or has reasonable cause to believe is inaccurate to a consumer reporting agency. We determined this matter resulted in no delinquent reporting of the Loan, and it is being reported accurately.

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

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

Sincerely,

[REDACTED]

Enterprise Client Relations
Office of the President

Enclosures

Loan Statement dated October 12, 2023
Loan Payment History
Loan Statement dated November 12, 2023