

PATRIOT BANK

JOB DESCRIPTION

POSITION TITLE: Fair Lending Compliance Officer

DEPARTMENT: Corporate

IMMEDIATE SUPERVISOR: CEO

DEPARTMENT SUPERVISOR: CEO

SUBMIT RESUME TO: PatriotHR@downhomebank.com

The Fair Lending Compliance Officer is responsible for maintaining an effective Fair Lending Program to ensure that the Bank remains compliant with all Fair Lending laws, regulations, and guidance. This position will perform Fair Lending monitoring of the Bank's lending portfolios, serve as the Bank's Fair Lending subject matter expert, advise Senior Management and the Board of Directors on Fair Lending risk issues and mitigation, partner with the business unit managers to identify and correct potential Fair Lending risk issues, and ensure that employees are appropriately trained to comply with Fair Lending requirements. This position will develop, implement, administer, and coordinate all aspects of the Bank's Fair Lending program by working with the appropriate internal and external individuals, groups, or business lines to achieve continuous improvement to and ongoing success of the Fair Lending Program.

MAJOR RESPONSIBILITIES

- Serve as the Bank's subject matter expert in Fair Lending laws and regulations.
- Manage Fair Lending compliance efforts throughout the Bank and ensure that the Bank's Fair Lending program is risk-based and appropriate for the size and complexity of the Bank.
- Work collaboratively with Executive Management to identify and manage Fair Lending risk across the Bank.
- Develop and implement robust Fair Lending risk reporting tools, including key risk indicators.
- Develop the Bank's annual Fair Lending plan and set the scope and frequency of monitoring activities.
- Complete periodic Fair Lending reviews, including ongoing comparative file reviews, marketing analysis, quality of assistance, exceptions, and redlining reviews, ensure appropriate remediation occurs, and maintain adequate work papers to support findings.

- Conduct an annual risk assessment that evaluates the level and direction of the Bank's Fair Lending risk in underwriting, pricing, marketing, steering, and redlining.
- Prepare clear and concise written reports that identify and explain the root cause of any risk issues and the necessary remediation plans.
- Prepare quarterly reporting to the Board of Directors regarding the level and direction of Fair Lending risk, status of remediation efforts, and communicate emerging trends or issues.
- Serve as committee member on the CRA/Fair Lending Committee, provide updates on Fair Lending risk, provide training to the committee, and work closely with the CRA Officer.
- Oversee the Fair Lending training program for employees, Executive Management, and the Board of Directors, including assigning and tracking completion of Fair Lending training, and developing and delivering customized training as needed.
- Assist in the coordination of audit and regulatory examinations, including advance preparation, follow-up on issues and observations, and develop written responses as needed.
- Develop and maintain written policies/procedures needed for the Fair Lending Program.
- Review credit policies/procedures, loan operations processes, loan pricing, marketing strategies, new and modified lending products, business changes, and services performed by third party vendors to proactively identify any Fair Lending issues.
- Attend training programs on Fair Lending to remain current with changing regulations and requirements and effectively implement any new and changing regulatory requirements. Disseminate the information to Bank personnel and lead change efforts, as necessary, to maintain compliant process, procedures, and activities. Work with affected business units to ensure appropriate compliance with new or changing requirements.
- Manage special projects and perform other duties as assigned.
- Maintain a current understanding of Bank policies and procedures in compliance with all federal and state laws, including but not limited to Bank Secrecy Act (SARs, CIP, OFAC), Information Security (GLBA), Identity Theft Red Flags, Financial Elder Abuse Reporting, and any other applicable regulations that may be specific to your job duties.
- Communicate a culture of compliance, need for effective internal controls, and high ethical standards.

EDUCATION, EXPERIENCE AND OTHER SKILLS REQUIRED

- Bachelor's Degree; advanced computer database and MS Office skills
- 5+ years of financial institutions consumer compliance experience, including specific experience in Fair Lending and managing Fair Lending regulatory examinations.
- Significant experience performing Fair Lending risk assessments, comparative file reviews, redlining analysis, and other monitoring activities.
- Expert knowledge of Fair Lending laws and regulations, and regulatory guidance/examination processes.
- Proven ability to collaborate with stakeholders to design, enhance, and implement both preventive and detective controls.
- Ability to lead an internal team to develop and execute the Fair Lending strategic plans and manage multiple complex projects and deadlines simultaneously.
- Highly motivated with the ability to be proactive, take initiative, and carefully monitor, follow through, and complete responsibilities in a professional and timely fashion
- Strong organizational and time management skills, with a demonstrated ability to meet deadlines while working independently.
- Excellent analytical skills, with experience conducting and understanding data/statistical analyses.
- Proven ability to effectively train and instruct others in formal and informal settings.
- Excellent interpersonal and communication skills, with the ability to interact effectively with all levels within an organization.
- Excellent verbal and written communications skills, including report development/presentation skills at the Board level.
- Thorough working knowledge of bank branch operations and lending processes.
- Prefer experience with specialized Fair Lending software and analytic tools such as CRA/Fair Lending Wiz, Centrax, and/or Trupoint/Ncontracts.