Key Bank is seeking a fair and Responsible Banking Officer at our Cleveland Ohio headquarters. Interested candidates can forward their resumes directly to me. My contact info is below. Thank you in advance for your consideration.

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POSITION TITLE:   Fair & Responsible Banking Compliance Officer (Division Manager)

JOB BRIEF (PURPOSE)

The Division Manager for Fair and Responsible Banking (F&RB) is responsible for the development and ongoing implementation of KeyBank's Fair and Responsible Banking Program (Program) and managing a team of compliance professionals who support the program.

The Program encompasses compliance risks for Fair Lending, Home Mortgage Disclosure Act, together with the recent addition of Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) as mandated by the Board of Directors under the Fair and Responsible Banking Policy (Policy). Related consumer compliance laws and regulations are also included in the scope of the position as applicable.

ESSENTIAL JOB FUNCTIONS

Oversees the F&RB Compliance department and the assigned compliance professionals. Evaluates employee performance and measurement (includes performance evaluations/feedback, continuous coaching, etc.). Provides guidance to staff regarding complex compliance issues. Evaluates and designs programs to ensure appropriate level compliance within the desired risk appetite. Participates in the new business initiative process. Interacts with senior level management within the organization in order to communicate and "sell" complex concepts and issues as appropriate. Effectively and professionally interacts with regulatory agency personnel such as answering examination information requests, addressing examination findings and
discussing compliance processes and policies. Manages violations and their resolution, addresses regulatory actions such as Cease and Desist orders and other regulatory communications, follows up and monitors until satisfactory resolution is obtained. Conducts monitoring of compliance programs and oversees complex compliance testing results to help determine appropriate corrective action (adherence to applicable laws and regulations). Sets and implements strategic direction of team or staff. Manages related compliance policies and procedures. Enforces compliance standards through well-communicated guidelines and by the establishment of protocol (example, minimum guidelines). Participates and maintains leadership roles on applicable executive level committees and taskforces (e.g., F&RB Working Group). Promotes a strong compliance culture throughout the corporation by positively interacting with Lines of Business (LOB) heads and senior level management.

The Division Manager has primary responsibility related to all of the elements of the Program as follows:

1. Governance, Management Reporting and Issues Escalation

Updating the enterprise level Policy and Program to reflect changing regulatory requirements and changes in internal risk profiles within the LOBs. Conducting the collection, inventory and format harmonization of all LOB level Procedures relating to the scope of the Program. Overseeing the development of a sustainable reporting format for F&RB Program quarterly reporting to create efficiencies in issues escalation to appropriate governance levels.

2. LOB Self-Testing Oversight and Compliance Monitoring - Risk and Control Self-Assessment (RCSA)

Managing the analysis and documentation of Second Line of Defense review of risks, controls and testing in the RCSA system. Directing the Fair Lending and HMDA Analysts for relevant Compliance Monitoring.

3. Risk Profile Review, Aggregate Risk Reporting, and Risk Tolerance Reporting

Managing the analysis and documentation of Second Line of Defense review of LOB Risk Profile for the Corporate Center. Assisting the assigned subject matter experts/RMG teams in the management of input for Risk Profiles for all LOBs with risks within the scope of the Program. Overseeing the development of a sustainable reporting format for F&RB Program quarterly reporting which effectively aggregates all risks covered by the scope of the Program. Leading the development of integrating Program reporting with Quarterly RCSA Risk Profile
reporting and effectively incorporating Risk Tolerance, Key Risk Indicator and Early Warning Indicator data as appropriate.


Managing the development of a sustainable reporting format for Program quarterly reporting which effectively incorporates BIRA implications for Inherent Likelihood and where applicable Residual Risk assessments for all LOB Risk Profiles and the Program quarterly reporting.

5. Regulatory Change Management

Updating GRC with the KeyBank specific analysis and response to current and emerging risks and legal and regulatory requirements which are entered by the Regulatory Change team and are applicable to the Program. Assisting the Regulatory Change team in the identification of current and emerging risks. Working with the Consumer Compliance team to identify interrelationships with related consumer compliance requirements and effectively coordinating documentation for these Regulatory Change items.

6. Enterprise and Role Based Training

Directing the review and development of annual enterprise training applicable to the Program. Overseeing the inventory and documentation of LOB level role based training to allow for review and oversight of content and documentation of training delivery and effectiveness.

7. Internal Risk Review and External Examination Management

Managing internal and external exams as applicable to the Program to drive favorable results.

8. Complaint Management

Leading the development of a sustainable reporting format for Program quarterly reporting and Risk Profile reporting which effectively utilizes the GRC system to incorporate the effect of complaints on Residual Risk assessments for each relevant LOB and for the aggregate Program Quarterly reporting.

9. Vendor Management and Third Party Management

Managing the HMDA Analyst for oversight of the RATA Comply Software
system. Overseeing the development of a sustainable reporting format for Program quarterly reporting and Risk Profile reporting which effectively utilizes the GRC system to incorporate the effect of vendor and third party risks on Residual Risk assessments for each relevant LOB and for the aggregate Program Quarterly reporting.

10. Regulatory Reporting - HMDA

Ensuring that assigned staff possesses the requisite level of understanding and learning for the monthly, quarterly and annual reporting process for HMDA. Driving data integrity to ensure timely and accurate reporting.

11. Product Cycle Reviews

   a. Product Development
   b. Sales and Marketing
   c. Disclosures and Notices
      d. Underwriting and Product Qualification
      e. Assessment of Fees
      f. Servicing
      g. Loss Mitigation and Collections Practices

Leading the development of a sustainable process for risk rating, scheduling and incorporating analysis of consumer products and risks associated with the above aspects of the product lifecycle and the related development of a sustainable reporting format for Program quarterly reporting which effectively incorporates product cycle review findings into the relevant areas of the RCSA, Risk Profile and Program reporting.

MARGINAL OR PERIPHERAL FUNCTIONS

Assists other Risk Management managers and the corporation's Chief Compliance Officer in special projects as assigned.

REQUIRED QUALIFICATIONS

Bachelor's Degree. Solid knowledge of industry, including laws and regulations. Knowledge of various bank products, LOBs and operations. Solid written and verbal communication skills and organizational
skills. High degree of self-motivation and ability to independently make decisions. Proven ability to work with high level management and deal with complex issues. Proven ability to "sell" difficult concepts and issues. Ability to lead a team and foster the Key Values within the team. Relationship building/management. 10+ years of compliance experience. 5+ years of management experience. Prior experience with regulatory compliance for Fair Lending, Home Mortgage Disclosure Act or Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) and other related bank regulatory consumer compliance laws and regulations. Experience with technology data bases and automated solutions to business processes.

PREFERRED QUALIFICATIONS

Advanced degree or J.D.

Certified Regulatory Compliance Manager (CRCM)

Project management experience

Ability to effectively utilize customized technology platforms and data bases

REPORTING RELATIONSHIPS

Position reports directly to the KeyCorp Chief Compliance Officer and works collaboratively with all members of the Risk Management team and applicable LOBs.

COMPETENCIES/SKILLS

1. Solid knowledge of federal banking regulations;

2. Ability to interact with a wide range of Key employees at all levels within the organization;

3. Ability to work and make decisions independently;

4. Excellent relationship building/management skills;

5. Excellent organizational and time management abilities. Must demonstrate flexibility, sound judgment, and the ability to multi-task while managing competing priorities, workload and resources in a fast moving environment;

6. Attention to detail and accuracy;

7. Ability to develop an understanding of federal, state and industry regulations;
8. Proven ability to effectively communicate both orally and in writing;

9. Solid analytical and problem solving skills and the use of good judgment;

10. High ethical standards and ability to maintain confidentiality; and

11. Strong problem solving and analytical skills and the ability to effectively summarize findings.

EQUIPMENT USED

Proficient in general Microsoft Office tools to include Outlook, Lotus Notes, Word, Excel, PowerPoint, and Access.

TRAINING REQUIRED

Training required and provided as deemed necessary by Chief Compliance Officer and as dictated by professional certification and regulation. On the job training, self-study, and assigned readings/materials.

JOB LOCATION

127 Public Square, Cleveland, Ohio (Home Office)

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