**JOB TITLE:** VP, BSA Officer  
**EXEMPT**  
**REPORTS TO:** SVP, Deposit Operations and Regulatory Compliance/CRA Officer  
**DEPARTMENT:** 140 - Compliance

### GENERAL SCOPE / SUMMARY
A brief description that summarizes the overall purpose and objectives of the position, the results the incumbent is expected to accomplish and the degree of freedom to act.

The BSA Officer is responsible for the implementation and administration of all aspects of the Bank Secrecy Act compliance program, under the guidance of the SVP, Deposit Operations and Regulatory Compliance/CRA Officer. This position performs various quality controls reviews and monitoring pertaining to the Bank Secrecy Act, USA Patriot Act, anti-money laundering, OFAC and Customer Identification Program compliance using industry standard and regulatory guidance to ensure the Bank's compliance efforts are maintained on a daily basis. Advises Senior Management and Bank personnel of emerging BSA compliance issues and consults and guides the Bank in the establishment of controls to mitigate risks. Assists the SVP, Deposit Operations and Regulatory Compliance/CRA Officer in ensuring department activities run smoothly and efficiently. The position of BSA Officer is required to be fully knowledgeable and skilled in all areas of the department.

### ESSENTIAL DUTIES and RESPONSIBILITIES
The tasks, duties and responsibilities of the position that are most important to get the job done.

**BSA**

1. Maintain current knowledge of the Bank Secrecy Act and all related anti-money laundering and OFAC regulations.
2. Not to harm consumers with any act that could be misleading, unfair, deceptive, or abusive in act or practice.
3. Performs daily review, monitoring, and analysis of various reports, logs, and transaction data to identify trends, unusual activity, and monitor large currency activity; determines if transactions are suspicious in nature, such as kiting, significant changes in balances, cash structuring in deposits, loans payments, and certificate of deposit purchases, wire or ACH transfers, monetary instrument sales, new account openings, etc.
4. Develop, coordinate, and facilitate training programs, sessions, and seminars to educate bank personnel about BSA related compliance requirements and procedures.
5. Coordinate the development and implementation of Bank forms, notices, and procedures and monitoring processes for compliance with the Bank Secrecy Act and related regulations.
6. Prepare for and coordinate regulatory and internal audit examinations.
7. Ensure compliance with 314(a) and 314(b) (PATRIOT Act) responsibilities.
8. Responsible for the preparation and submission of all Currency Transaction Reports within required timeframes.
9. Oversee and coordinate the monitoring of account activity for suspicious patterns and
activity, conducts suspicious activity report (SAR) investigations, decide when to file suspicious activity reports, and file SARs when applicable.

10. Oversee and responsibility for the review, approval, and filing of all Currency Transaction Reports (CTRs) within required timeframes.

11. Researches and responds to information requests from FinCEN and other government entities.

12. Prepare reports for the Board of Directors on a periodic basis and ensure that the Board is kept fully informed of the BSA program, including but not limited to:
   a. Sending suspicious activity reports to the Board
   b. Training Board members and other senior management on BSA compliance
   c. Presenting the written risk assessment and Bank Secrecy Act policy to the Board annually.

13. Maintain current knowledge of all federal and state laws and regulations, along with the Bank’s policies and procedures.

14. Prepares the annual BSA Risk Assessment.

15. Administers automated BSA/AML/Fraud system, researches and resolved alerts and conducts investigations within the system.


**General Compliance**

1. Provides assistance to the Compliance Department when needed.

2. Maintains a proficient knowledge of all applicable rules and regulations.

3. Researches regulatory issues and responds to compliance questions from Bank personnel, using legal and regulatory reference materials, regulatory agencies, Bank legal counsel, and professional associations and organizations, as appropriate.

4. Conducts self-assessments as scheduled.

5. Assists in special projects and tasks for the department as directed.

6. Assists in the development, revision or reviews of bank policies, procedures, disclosures, notices, and forms to comply with legislative and regulatory changes or new requirements.

**SECONDARY / NONESSENTIAL FUNCTIONS**

The desirable, but not necessary, aspects of the job.

**SUPERVISORY RESPONSIBILITIES**

The scope of the person’s authority, including a list of jobs that report to the incumbent. List the position titles and number of employees directly supervised and indirectly supervised.

Manages BSA department employees which include Deputy BSA Officer and Compliance Specialist, Senior BSA and Compliance Specialist, and partial oversight of other employees
with partial BSA analyst job functions.

**DECISION MAKING**
Give several examples of the types of decisions or recommendations made in performing the responsibilities of this job.

Requires continuous exercise of judgment following broad guidelines. Identifies and selects complex choices of action where standard practices may not exist. Must be able to accommodate detailed work, problem solving, reasoning, math, presentations, verbal communication, written communication, analytical reasoning, training others, multiple concurrent tasks and constant interruptions.

**JOB DIMENSIONS**
List specific examples of responsibility that this job has for company assets, such as revenues, capital expenditures, budget responsibility, financial responsibility, etc.

Ability to deal with routine problems involving multiple facets, variables, and situations where only limited standardization exists.

**BANK SECRECY ACT REQUIREMENTS**
Responsible for adhering to the reporting and recordkeeping requirements of the Bank Secrecy Act and Anti-Money Laundering rules and regulations, observing economic sanctions by prohibiting transactions as specified by the Office of Foreign Asset Control (OFAC), following the bank’s customer identification program (CIP) rules, observing all Bank policies and procedures relating to BSA, OFAC, CIP, and related acts, and participation in ongoing related training.

**KNOWLEDGE, SKILLS and ABILITIES REQUIRED (MINIMUM QUALIFICATIONS)**
The specific minimum competencies (education and experience) required to perform this job successfully. An individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

1. Understanding of legislative and regulatory processes
2. Familiarity with all functional areas of banking
3. Excellent oral and written communication skills
4. Comprehensive understanding of general banking compliance regulations and laws
5. Comprehensive understanding of general banking operations activities, products, and services
6. Ability to proactively identify and assess potential concerns and risks
7. Ability to resolve issues, work independently, and meet deadlines
8. Persuasive and team-oriented
9. Ability to communicate effectively with staff at all levels

10. College degree, or equivalent banking experience

11. Five years general banking or regulatory agency experience, with an emphasis in BSA compliance and Operations. Previous experience managing High Risk

12. Previous experience managing High Risk BSA/AML programs, and experience with MSB’s.

13. Effective verbal, written, and interpersonal communication skills with the ability to instruct others, train personnel, write reports, correspondence and procedures, and speak clearly to customers and employees

14. Good organizational and time management skills

WORK CONDITIONS
The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Standard office environment with a moderate noise level.

PHYSICAL DEMANDS
The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of this job, the employee is:

- Regularly required to talk or hear.
- Required to sit for long periods and reach with hands and arms.
- Occasionally required to stand; walk.
- Occasionally required lifting up to 25 pounds.

The vision requirements include ability to adjust focus and close vision.

Management reserves the right to add to, change and revise this description at any time. This description does not include any marginal functions that are incidental to the essential functions. Also, it does not imply that these are the only tasks to be performed by the incumbent. Employees are required to follow any other job-related instructions and to perform any other job-related tasks requested by their supervisor. Any requirement may be modified to reasonably accommodate individuals with disabilities.

I have read and understand this explanation and job description.

Print Employee Name: __________________________________________

Employee Signature: ____________________________________________ Date: ____________________