

Chief Compliance Officer

Posted Date 17 hours ago(4/7/2026 6:13 PM)

Location Name : Central Office

Salary Min: USD \$154,700.00/Yr.

Salary Max: USD \$259,440.00/Yr.

Category: Central Office

of Openings: 1

Close Date: 4/15/2026

Subject: Not Applicable - Non-Instructional Position

Purpose and Scope

Provides executive-level leadership for the design, implementation, and oversight of a comprehensive enterprise compliance and internal controls program for Memphis-Shelby County Schools (MSCS). Serving as the District's chief architect of ethical governance, the Chief Compliance Officer (CCO) applies the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Internal Control – Integrated Framework and Enterprise Risk Management (ERM) Framework to establish a culture of compliance, accountability, and fiscal integrity across all District schools, departments, and operations. Reports to the Superintendent and serves as the second line of defense in the District's Three Lines governance model, working in close coordination with the Office of Inspector General (third line) to ensure complete oversight of the District's \$1.6+ billion annual budget.

Essential Job Functions

1. Leads the development, implementation, and continuous improvement of the District's enterprise compliance and internal controls program using the COSO Internal Control – Integrated Framework (2013). Establishes and maintains all five COSO components across MSCS: Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring Activities. Provides strategic direction to ensure that internal controls are effective, consistently applied, and aligned with District objectives across all schools and central office departments.
2. Develops and maintains the District's Enterprise Risk Management (ERM) program in accordance with the COSO ERM Framework (2017). Conducts annual enterprise-wide risk assessments to identify, evaluate, and prioritize strategic,

operational, financial, legal, and reputational risks facing MSCS. Maintains a comprehensive risk register and communicates the risk landscape to the Superintendent, Chief Officers, and Board of Education on a regular basis. Ensures risk mitigation strategies are implemented and monitored.

3. Develops, maintains, and enforces the District's Code of Ethics and compliance policy framework. Drafts, revises, and coordinates adoption of ethics policies, conflict of interest policies, gift and gratuity policies, vendor conduct standards, and other compliance-related policies. Maintains a master policy inventory with clearly assigned owners, last-review dates, and scheduled review cycles to ensure policies are current, consistently enforced, and updated to reflect changes in law and regulation. Coordinates with Legal Services and Human Resources to resolve policy conflicts.
4. Designs and delivers a comprehensive District-wide compliance and ethics training program for all employees, administrators, principals, and Board members. Develops role-specific training modules covering fraud prevention, procurement compliance, federal grant requirements, student data privacy (FERPA), conflicts of interest, and whistleblower protections. Maintains training records and monitors participation rates. Coordinates with Human Resources to integrate compliance training into new employee onboarding and annual professional development cycles.
5. Administers the District's compliance monitoring and transaction testing program. Conducts or oversees ongoing monitoring of key internal controls across departments and school campuses, including periodic compliance testing of P-card transactions, ACH disbursements, manual warrants, check requests, payroll, and travel reimbursements for adherence to authorization requirements, dollar-threshold controls, documentation standards, and pre-approval procedures. Identifies and documents control gaps and deficiencies, works with department heads and principals to develop corrective action plans, and monitors implementation to completion. Reports monitoring findings and remediation status to the Superintendent.
6. Oversees the District's federal and state grant compliance program. Ensures adherence to all programmatic and fiscal requirements governing Title I, Title II, Title III, IDEA, McKinney-Vento, E-Rate, ESSER, and other federal and state funding streams. Coordinates with the Federal and State Programs department and Finance to develop grant compliance checklists, monitoring protocols, and fiscal controls.

Leads the District's response to federal and state program audits, monitoring visits, and compliance reviews. Tracks findings and ensures timely corrective action.

7. Leads the District's conflict of interest disclosure and management program. Develops and administers annual financial disclosure and conflict of interest certification requirements for all employees in positions with procurement, contracting, or financial authority. Reviews disclosures, identifies potential conflicts, and coordinates with Legal Services on remediation or recusal. Maintains records of disclosures and conflict resolutions. Provides training and guidance to employees on recognizing and reporting conflicts of interest.
8. Administers the District's compliance hotline and complaint management system (including the CARES – Centralized Complaint Assessment and Referral Evaluation System or equivalent). Receives, logs, triages, and routes compliance complaints from employees, vendors, and community members, including anonymous whistleblower submissions. Distinguishes between compliance matters (handled by the CCO) and investigative matters (referred to the Office of Inspector General or Human Resources). Maintains confidentiality and anti-retaliation protections for all good-faith reporters. Reports complaint trends and dispositions to the Superintendent.
9. Oversees the District's procurement and contract compliance program. Monitors procurement transactions for adherence to competitive bidding requirements, purchase order thresholds, and contract execution controls. Reviews sole source, single source, and emergency contracts to verify proper justification and policy compliance. Monitors subcontractor approval processes and flags duplicative or redundant contracting. Oversees compliance obligations related to fiscal agents and third-party entities administering District funds, including requirements for formal written agreements, fund usage accountability, and transparency in reporting of fund balances.
10. Develops and oversees the District's records retention and HR regulatory compliance program. Establishes and enforces enterprise-wide records retention schedules by document type in accordance with Tennessee Code Annotated requirements, ensuring key records are centrally accessible and co-located across systems. Conducts periodic records compliance reviews, including employment eligibility verification (Form I-9) audits in coordination with Human Resources, to ensure required documentation is maintained and retrievable. Ensures that compliance procedures and institutional knowledge are formally documented to preserve continuity across leadership and staff transitions.

11. Provides compliance governance oversight of the District's information technology and cybersecurity control environment. Coordinates with IT leadership to ensure that user access provisioning, modification, termination, and periodic access reviews are consistently performed and documented across all financial, HR, and operational systems. Monitors adherence to the District's data governance, acceptable use, and cybersecurity policies. Ensures IT-related compliance obligations under FERPA, CIPA, and applicable Tennessee law are integrated into the broader compliance program.
12. Coordinates with the Office of Inspector General to ensure the District's compliance and oversight functions operate in alignment. Shares risk intelligence and monitoring findings with the OIG to inform the OIG's proactive audit work plan. Receives and tracks OIG recommendations issued from investigations and audits; develops and monitors the District's management response and corrective action plans. Facilitates information sharing while preserving the full independence of the OIG from the CCO's administrative function. Coordinates with the District's Internal Audit, Legal Services, Finance.
13. Human Resources, and Procurement departments to align compliance activities and avoid duplication. Supports the maturity and independence of the Internal Audit function by advocating for a current Internal Audit Charter, formal audit universe, risk-based annual and multi-year audit plans, and appropriate Board reporting relationships. Serves as the primary liaison to external auditors—including the Tennessee Comptroller's Office, U.S. Department of Education monitoring staff, and federal grant auditors—on compliance-related matters. Coordinates the District's response to external audit findings and monitors implementation of corrective actions across departments.
14. Develops, presents, and defends the CCO office's annual budget requirements to the Superintendent. Oversees and approves program expenditures. Prepares financial reports and budget documentation as required. Manages the allocation of CCO office resources across compliance program functions. Recruits, hires, supervises, trains, and evaluates compliance office staff. Establishes performance standards, conducts annual reviews, and serves as coach and mentor for direct reports.
15. Provides executive-level compliance counsel and advisory services to the Superintendent, Chief Officers, department directors, and principals. Advises on the compliance implications of proposed policies, contracts, procurement decisions, and operational changes. Issues formal compliance opinions

or guidance memoranda when warranted. Serves as the District's primary expert resource on federal and state education law compliance, government ethics requirements, and public sector internal control standards.

16. Develops and publishes an Annual Compliance Report summarizing the state of the District's internal controls and compliance program, including: risk register summary, monitoring and transaction testing results, records retention compliance status, training completion rates, compliance hotline statistics, corrective action status, and forward-looking priorities. Presents the Annual Compliance Report to the Superintendent and, through the Superintendent, to the Board of Education. Coordinates with the Office of Inspector General to ensure the OIG Annual Report and Compliance Annual Report are complementary and non-duplicative.
17. Maintains current knowledge of all federal and state laws, regulations, guidance documents, and administrative rules applicable to the operation of a public school district in Tennessee, including Tennessee Code Annotated provisions governing school districts, U.S. Department of Education program regulations, Office for Civil Rights requirements, FERPA, IDEA, Title IX, USCIS employment eligibility verification requirements, and applicable requirements of the Tennessee Comptroller's Office. Monitors regulatory changes and proactively updates District policies, training, and controls to maintain compliance.
18. Directs the preparation and maintenance of a variety of narrative and statistical reports, records, correspondence, compliance documentation, and files related to assigned service areas, activities, and operations. Provides for appropriate research and compiles reports as needed. Performs other related duties as assigned or directed.

Minimum Qualifications

Graduation from an accredited college or university with a Master's Degree in Public Administration, Business Administration, Law, Accounting, Finance, or a closely related field plus an additional eight (8) years of progressively responsible experience in compliance, risk management, internal audit, or a related function in the public sector; OR a Bachelor's Degree in a related field and ten (10) years of equivalent experience, for a total education/experience equivalency of fourteen (14) years. Experience in a K-12 public school district, local government, state agency, or federal agency is strongly preferred. **(PROOF OF EDUCATION, TRAINING, AND/OR EXPERIENCE IS REQUIRED).**

Degree Equivalency Formula:

Bachelor's Degree= 4 years plus required years of experience.

Master's Degree=6 years plus required years of experience.

Additional Job Details

Interested persons should apply for the position through the MSCS website:

www.scsk12.org

The salary range for the position is minimum \$154,700.00/yr. to maximum \$259,440.00/yr.