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RESPONSE TO REQUEST FOR INFORMATION

RFI No. 163-0410261GB

Charlotte-Mecklenburg Board of Education

Compliance Assessment Services

Submitted By:

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Managing Attorney

Hedgebeth Carter Law Group, PLLC

Submitted: April 2026 | Deadline: April 24, 2026



SECTION 1 — COMPANY OVERVIEW & RELEVANT EXPERIENCE

About Hedgebeth Carter Law Group, PLLC

Hedgebeth Carter Law Group, PLLC ("HCLG" or the "Firm") is a North Carolina-based boutique law firm headquartered in Greensboro, North Carolina. The Firm provides concierge legal services to individuals, businesses, and institutional clients across a range of practice areas, including civil litigation, business formation and corporate governance, real estate transactions, and regulatory compliance.

HCLG is led by Brandon Hedgebeth, Esq., MBA, a North Carolina (and District of Columbia) licensed attorney who brings the analytical rigor of AmLaw 100 practice to a client-centered, accessible model. For this engagement, HCLG has partnered with The Johnson Law Group, LLC — a Washington, DC and Maryland-based firm with over 25 years of experience in commercial litigation, finance law, corporate taxation, and regulatory compliance — to form a five-member interdisciplinary assessment team. The Firm's practice philosophy is grounded in precision, thoroughness, and strategic thinking — qualities that translate directly to high-stakes compliance review engagements.

Relevant Experience & Qualifications

Governance Experience in Public Higher Education: Attorney Hedgebeth served as a member of the North Carolina Central University Board of Trustees (2019–2020), providing direct governance oversight within a publicly-funded educational institution. This experience offered first-hand exposure to how public educational institutions manage policy compliance, fiduciary responsibilities, HR structures, and financial oversight — precisely the areas CMS seeks to assess.

BigLaw Compliance & Regulatory Background: Prior to founding HCLG, Attorney Hedgebeth spent nearly three years as a full-time Associate at K&L Gates LLP (Charlotte, NC), one of the world's largest law firms, advising institutional clients on regulatory compliance, risk assessment, and complex transactional due diligence. He also served as a Summer Associate at Womble Bond Dickinson (US) LLP, where he worked on corporate governance, compliance documentation, board resolutions, and securities regulatory review.

JD + MBA Dual Credential: Attorney Hedgebeth holds a Juris Doctor (Magna Cum Laude) and Master of Business Administration (Real Estate concentration) from North Carolina Central University. This dual credential is uniquely suited to the CMS scope, which spans both legal compliance (federal education mandates) and operational/financial compliance within the HR and Finance departments.

North Carolina Focus: As a North Carolina-licensed attorney practicing in Greensboro, HCLG brings direct knowledge of North Carolina General Statutes, State Board of Education regulations, and the operational context of NC public institutions. The Firm is positioned to assess CMS's compliance against both federal mandates and applicable state law without the learning curve of an out-of-state provider.

Project REAP Alumni Fellow: Attorney Hedgebeth is a Fellow of Project REAP, a nationally recognized program advancing high-potential professionals through rigorous training in finance, development, and institutional operations. This background strengthens his capacity to assess finance department compliance and institutional financial governance.

SECTION 2 — PROPOSED METHODOLOGY & APPROACH

Overview

HCLG proposes a structured, six-step compliance assessment methodology grounded in the specific legal frameworks governing North Carolina local educational agencies (LEAs). The approach is drawn directly from applicable federal statutes, North Carolina General Statutes, State Board of Education regulations, and relevant case law — ensuring that every area of assessment has a concrete legal basis and that findings carry analytical weight.

The assessment will encompass the Human Resources and Finance departments as identified in the RFI, as well as any additional departments determined to be necessary following the initial scoping phase.

Step 1 — Identify the Governing Legal Framework

Before any document review begins, HCLG will map the full legal landscape applicable to CMS. This framework serves as the baseline against which all policies and practices are measured and includes:

- Federal statutes: FERPA (20 U.S.C. § 1232g) — student records protection and permissible disclosure; IDEA (34 C.F.R. § 300.17) — Free Appropriate Public Education (FAPE) requirements; Section 504 of the Rehabilitation Act; Title II of the ADA (28 C.F.R. § 35.130); Title IX (20 U.S.C. § 1681); and Title VII of the Civil Rights Act
- North Carolina statutes: N.C. Gen. Stat. § 115C-1 (uniform system of public schools); § 115C-12 (State Board duties and LEA oversight, including Uniform Education Reporting System); § 115C-107.4 (State Board monitoring of LEA compliance with IDEA); § 115C-390.4 (student discipline and equal educational opportunity); § 115C-447 (annual audit requirements for local school administrative units); § 115C-521 (school facilities)
- State Board of Education regulations, including N.C. Admin. Code .0384 (mentor program requirements) and applicable HR and Finance operational directives
- Controlling case law: *Wake Cares, Inc. v. Wake County Bd. of Educ.*, 363 N.C. 165 (2009); *Silver v. Halifax Cty. Bd. of Comm'rs*, 255 N.C. App. 559 (2017) (sound basic education standard); *A.J.T. v. Osseo Area Sch., Indep. Sch. Dist. No. 279*, 605 U.S. 335 (2025) (disability discrimination in public education)

Step 2 — Review CMS Policies, Procedures & Practices

HCLG will request and review CMS written policies and operational documentation, assessing alignment with the legal framework established in Step 1:

- FERPA compliance: Verification that student education record policies comply with 20 U.S.C. § 1232g and 34 C.F.R. Part 99, including permissible disclosure conditions and annual notification requirements
- IDEA and FAPE compliance: Assessment of IEP development, evaluation timelines, and procedural safeguards under 34 C.F.R. § 300.17 and N.C. Gen. Stat. § 115C-107.4
- HR policies: Review of hiring, promotion, discipline, and termination procedures for compliance with Title VII, Title IX, ADA Title II (28 C.F.R. § 35.130), and N.C. Gen. Stat. § 115C-390.4
- Finance policies: Review of internal controls, budget governance, grant fund administration, and procurement for compliance with N.C. Gen. Stat. § 115C-447 (annual audit requirements) and § 115C-12 (financial reporting obligations to the State Board)

Step 3 — Evaluate Governance & Administrative Oversight

Under N.C. Gen. Stat. § 115C-12, the State Board of Education maintains broad supervisory authority over LEAs. HCLG will evaluate:

- Whether CMS complies with State Board supervision requirements and the Uniform Education Reporting System under N.C. Gen. Stat. § 115C-12
- Whether budget submissions and audit compliance obligations are being met under N.C. Gen. Stat. § 115C-447, including — critically — whether any corrective action plans have been required and whether prior corrective actions were fully implemented
- Whether required programs such as the teacher mentoring program (N.C. Admin. Code .0384) have been established and are operational

- Whether the Board's governance structure and internal oversight mechanisms are consistent with the duties established under state law and as interpreted in *Wake Cares, Inc. v. Wake County Bd. of Educ.*, 363 N.C. 165 (2009)

Step 4 — Examine Anti-Discrimination & Equal Opportunity Compliance

A core focus of the assessment will be CMS's compliance with anti-discrimination mandates across HR and educational programming:

- Title IX: Review of grievance procedures, coordinator designations, response protocols for sexual harassment complaints, and staff training records
- Section 504 and ADA Title II: Assessment of reasonable accommodation practices, program accessibility, and non-discrimination in employment — incorporating the Supreme Court's recent guidance in *A.J.T. v. Osseo Area Sch., Indep. Sch. Dist. No. 279*, 605 U.S. 335 (2025)
- Student discipline equity: Review of discipline policies and application for compliance with N.C. Gen. Stat. § 115C-390.4 and the equal educational opportunity mandate under § 115C-1
- Title VII employment practices: Evaluation of HR procedures for compliance with federal anti-discrimination employment requirements

Step 5 — Conduct Stakeholder Interviews & On-Site Review

Document review alone cannot capture the gap between written policy and operational reality. HCLG will conduct structured interviews with key HR and Finance personnel, and as needed, other department leadership:

- HR interviews: Hiring procedures, Title IX response, ADA accommodation processes, records management, and employee discipline practices
- Finance interviews: Internal controls, audit preparation, grant tracking, budget governance, and procurement compliance under N.C. Gen. Stat. § 115C-447
- Assessment of staff training on IDEA, FERPA, Title IX, and ADA — inadequate training is among the most common sources of institutional compliance exposure
- Identification of practice-policy gaps, which frequently represent the highest-risk findings in any public sector compliance engagement

Step 6 — Findings, Risk Classification & Corrective Action Plan

All findings from Steps 1 through 5 will be synthesized into a comprehensive written Compliance Assessment Report, with findings organized by legal requirement and classified by risk level:

- Critical: Material noncompliance with federal or state law creating significant risk of regulatory sanction, fund withholding, or litigation exposure
- Moderate: Areas requiring near-term remediation to fully align practice with applicable legal requirements
- Advisory: Best practice recommendations that reduce long-term institutional risk, even where no current violation exists

A prioritized Corrective Action Plan (CAP) will accompany the report. Where applicable, the CAP will be structured to satisfy the corrective action submission requirements of N.C. Gen. Stat. § 115C-447 and § 115C-107.4, and to position CMS favorably in the event of a future State Board or OCR inquiry. HCLG will present findings to CMS leadership and remain available for follow-up consultation through the implementation phase.

Step 7 — Monitoring Plan for Ongoing Compliance

A one-time compliance assessment, standing alone, is insufficient to maintain durable compliance in a dynamic regulatory environment. As an optional but strongly recommended deliverable, HCLG will develop a tailored Ongoing Compliance Monitoring Plan designed to ensure CMS remains in compliance between formal assessment cycles. This plan will incorporate the following components, grounded in federal and state law:

- General supervision alignment: Under 34 C.F.R. § 300.149, the State Educational Agency (SEA) bears ultimate responsibility for ensuring that all LEA programs for children with disabilities comply with IDEA Part

B. The monitoring plan will ensure CMS's internal oversight structures are calibrated to meet SEA reporting expectations and avoid triggering state-level intervention

- Quantitative and qualitative performance indicators: Consistent with 34 C.F.R. § 300.600, the monitoring plan will identify measurable indicators in priority areas — including FAPE provision, least restrictive environment implementation, and disproportionate representation of racial and ethnic groups in special education — to allow CMS to track compliance performance on an ongoing basis
- Incentive and sanction awareness: Under N.C. Gen. Stat. § 115C-107.4, the State Board operates a tiered system of recognition and sanctions for LEAs. The monitoring plan will identify which performance benchmarks CMS must meet to avoid corrective action triggers, fund withholding, or referral for enforcement under state or federal law
- Complaint resolution readiness: Pursuant to 34 C.F.R. § 300.151, the SEA must maintain written complaint resolution procedures available to parents and other stakeholders. The monitoring plan will verify that CMS's complaint intake and response mechanisms are adequately documented, staffed, and publicized
- Data collection and transparent reporting: Under 20 U.S.C. § 6311, LEAs must collect and report data on school quality, safety, and teacher qualifications — disaggregated by poverty level and funding source. The monitoring plan will establish data collection protocols consistent with these requirements and with N.C. Gen. Stat. § 115C-47, which directs minimization of duplicative reporting obligations
- Timely corrective action timelines: Under 34 C.F.R. § 300.600, when noncompliance is identified — whether through this assessment or subsequent monitoring — corrective actions must be fully implemented within one year. The monitoring plan will build this timeline into CMS's internal compliance calendar and assign responsibility for implementation tracking
- Interagency coordination: Pursuant to 20 U.S.C. § 1412, effective compliance requires interagency agreements defining financial responsibilities and dispute resolution mechanisms for services required to provide FAPE. The monitoring plan will identify whether any such agreements require review or renewal

The Ongoing Compliance Monitoring Plan is available as a retainer-based service, allowing CMS to engage HCLG on a continuing basis for periodic compliance check-ins, policy updates, and regulatory guidance as federal and state education law continues to evolve.

SECTION 3 — SAMPLE DELIVERABLES

Written Compliance Assessment Report

The primary deliverable will be a formal written Compliance Assessment Report organized as follows:

- Executive Summary — High-level overview of scope, methodology, and key findings for CMS leadership
- Legal Framework Overview — Summary of applicable federal and NC laws assessed, including IDEA, Title IX, FERPA, ADA, Title VII, and relevant NC statutes
- Department-Specific Findings — HR and Finance compliance findings, each organized by legal requirement, current practice, identified gap (if any), and risk rating
- Risk Matrix — Visual summary of all findings categorized by severity and likelihood of regulatory exposure
- Corrective Action Plan — Prioritized, actionable recommendations with suggested timelines and responsible parties
- Appendices — Supporting documentation, interview summaries (anonymized), and legal citations

Prior Compliance-Adjacent Work Product

While HCLG is a newer firm, Attorney Hedgebeth's compliance-related work experience includes the following representative examples:

- Regulatory compliance reviews and legal memoranda produced at K&L Gates LLP advising CMBS lenders and servicers on compliance with securitization requirements
- Corporate governance compliance documentation and board resolutions drafted at Womble Bond Dickinson (US) LLP

- Reviewed and analyzed public company proxy statements to assess disclosure compliance and shareholder impact at Womble Bond Dickinson
- Examined State Securities Filings for regulatory adherence and shareholder reporting requirements
- Drafted motion to reconsider in a class action matter, analyzing case law and procedural arguments involving compliance and rules of evidence

Sample work product from prior engagements is available upon request, subject to applicable confidentiality obligations. HCLG is prepared to discuss the scope and nature of prior compliance work during any follow-up meeting with CMS.

SECTION 4 — ESTIMATED TIMELINE

HCLG proposes the following six-week timeline, subject to adjustment based on CMS's availability and the volume of documentation to be reviewed:

Phase	Timeline	Key Activities
Phase 1	Weeks 1–2	Scoping kickoff, document collection, legal framework mapping, preliminary gap identification
Phase 2	Weeks 3–4	Stakeholder interviews, operational review of HR and Finance practices
Phase 3	Week 5	Compliance gap analysis, risk categorization, preliminary findings draft
Phase 4	Week 6	Final report delivery, Corrective Action Plan, leadership presentation

Total estimated engagement duration: 6 weeks from executed engagement agreement. HCLG can begin scoping activities within one week of award and is prepared to accommodate CMS's scheduling needs.

SECTION 5 — ESTIMATED COST OF ASSESSMENT

Hedgebeth Carter Law Group, PLLC offers two fee structure options for CMS's consideration:

Fee Option	Estimated Fee	Includes
Flat Fee (Full Engagement)	\$30,000	All four phases, written report, CAP, and leadership presentation. Fixed price — no hourly surprises.
Monthly Retainer	\$30,000 (structured as monthly payments)	Same full-scope engagement billed in monthly installments; retainer may be structured to include ongoing compliance advisory support post-assessment

Note: Final pricing will be confirmed following a scoping call with CMS. HCLG and The Johnson Law Group, LLC will jointly deliver this engagement, bringing a five-member interdisciplinary team to bear across all seven assessment steps. This collaborative structure ensures CMS receives senior-level legal expertise, finance and tax

compliance depth, data governance specialization, and frontline K-12 education perspective — all within a cost-effective boutique engagement model that larger national firms cannot match.

SECTION 6 — KEY PERSONNEL, ROLES & DELEGATED DUTIES

The following five-member team has been assembled to conduct the CMS Compliance Assessment. Each member contributes a distinct and complementary set of qualifications spanning law, finance, data governance, and K-12 education. All work is directed by Lead Assessor Brandon Hedgebeth, Esq., MBA, with every team member participating across all seven engagement steps. Notably, four of the five team members are graduates of North Carolina Central University — an institution whose mission of service to public institutions is reflected in every aspect of this team's approach.

TEAM PERSONNEL, ROLES & DELEGATED DUTIES			
Team Member	Role / Title	Engagement Steps	Primary Area of Contribution
Brandon Hedgebeth, Esq., MBA <i>Hedgebeth Carter Law Group, PLLC</i>	Lead Assessor & Engagement Attorney	Steps 1–7 (All Phases)	Overall engagement direction; legal framework mapping; final report authorship; CAP structuring; CMS client communications and leadership presentation
William C. Johnson, Jr., Esq., MBA, LL.M <i>The Johnson Law Group, LLC</i>	Senior Co-Assessor — Finance & Tax Compliance	Steps 1–7 (All Phases)	Finance department compliance review; tax governance; M&A regulatory analysis; internal controls assessment; CAP structuring for financial findings
William C. Johnson, III, Esq. <i>The Johnson Law Group, LLC</i>	Co-Assessor — Litigation & Procedural Compliance	Steps 1–7 (All Phases)	Civil litigation exposure analysis; procedural compliance review; stakeholder interviews; legal research; deposition and evidentiary protocol assessment
Cori Johnson, Esq., M.S. <i>The Johnson Law Group, LLC</i>	Co-Assessor — Data Governance & Records Compliance	Steps 1–7 (All Phases)	FERPA and data governance compliance; information systems review; document review and management; discovery protocol assessment; ongoing monitoring plan development
Angela Perry, M.Ed. <i>K-12 Education Subject Matter Expert</i>	Curriculum Compliance Consultant	Steps 1–7 (All Phases)	Classroom-level compliance perspective; IEP and curriculum review; mentor program compliance (N.C. Admin. Code .0384); instructional staff interviews; school improvement governance input

TEAM MEMBER QUALIFICATIONS	
<div>Brandon Hedgebeth Esq., MBA</div> <div>Lead Assessor & Engagement Attorney</div> <div>Hedgebeth Carter Law Group, PLLC</div> <div>NC & DC Bar</div>	<div>Credentials</div> <div><ul style="list-style-type: none">JD, Magna Cum Laude — NCCU School of Law (2023) MBA — NCCULicensed: North Carolina & District of Columbia Triple Eagle — NCCU</div> <div>Experience</div> <div><ul style="list-style-type: none">Managing Attorney, Hedgebeth Carter Law Group, PLLCAssociate, K&L Gates LLP — Charlotte, NCSummer Associate, Womble Bond Dickinson (US) LLPNCCU Board of Trustees MemberProject REAP Alumni Fellow</div> <div>Compliance Experience</div>

	<ul style="list-style-type: none"> • Discovery compliance, document review protocols, and local rules adherence • Ongoing monitoring plan development leveraging information science methodology
<p>Angela Perry M.Ed.</p> <p>K-12 Education Subject Matter Expert & Curriculum Compliance Consultant</p> <p>Northwood Elementary Guilford County Schools</p>	<p>Credentials</p> <ul style="list-style-type: none"> • M.Ed., Curriculum & Instruction (Reading concentration) — UNC Greensboro (2009) • B.S. in Education, Elementary Education K-6 — High Point University (2001) • Certified Academic and Gifted Teacher — Guilford County Schools <p>Experience</p> <ul style="list-style-type: none"> • 4th Grade Teacher & School Based Leadership Team Member — Northwood Elementary, GCS (2010–Present) • Teacher Mentor — Guilford County Schools (ongoing) • 5th Grade Teacher — Liberty Drive Elementary, Thomasville City Schools (2000–2010) • 30 years of K-6 classroom and school leadership experience in NC public schools <p>Awards & Recognition</p> <ul style="list-style-type: none"> • Teacher of the Year — Northwood Elementary School, Guilford County Schools • FOX8 Educator of the Week Honoree <p>Compliance Expertise</p> <ul style="list-style-type: none"> • Classroom-level IDEA/IEP implementation — 30 years of direct operational experience • School improvement planning and governance — School Based Leadership Team member • Teacher mentoring compliance — active mentor under N.C. Admin. Code .0384 • Differentiated instruction and academically gifted program compliance (IDEA gifted provisions) • FERPA student records practices — 30 years of classroom-level records management

STATEMENT OF INTEREST

Hedgebeth Carter Law Group, PLLC is genuinely invested in the success of North Carolina's public school systems. As a North Carolina-based attorney who has served in an institutional governance role at a public educational institution, Attorney Hedgebeth brings both technical legal expertise and a deep appreciation for the mission that drives public education.

HCLG is committed to providing CMS with a thorough, objective, and actionable compliance assessment — not a boilerplate audit. Every engagement is handled at the senior attorney level, ensuring that CMS receives the expertise it needs without the overhead of a large consulting firm.

We welcome the opportunity to discuss this engagement further and to answer any questions CMS may have regarding our qualifications or approach.

Respectfully submitted,

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