

RESPONSE TO REQUEST FOR INFORMATION Compliance Assessment Services (CAS)

prepared for

Charlotte-Mecklenburg Board of Education

Poyner Spruill^{LLP}

April 24, 2026

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VIA ELECTRONIC MAIL TO:

Charlotte-Mecklenburg Board of Education
ATTN: Anna Hehenberger
annam.hehenberger@cms.k12.nc.us

RE: Request For Information (RFI) 163-0410261GB – Compliance Assessment Services

Dear Charlotte-Mecklenburg Board of Education:

On behalf of Poyner Spruill LLP, we are pleased to submit this response to provide Compliance Assessment Services (“CAS”) to the Charlotte-Mecklenburg Board of Education (“Board”) and Charlotte-Mecklenburg Schools (“CMS”). After reviewing the Request for Information (“RFI”) for Compliance Assessment Services, we are confident that our firm’s experience, commitment to public education, and long-standing work with North Carolina public school districts align well with the needs of the Board and CMS.

Poyner Spruill has earned a strong reputation for delivering prompt, cost-effective, and highly professional legal counsel. We take a tailored, client-centered approach, ensuring that the full resources of our firm are aligned with our clients’ needs. Our Education Law Practice Group was founded on the principle that our clients’ needs come first, and we understand the importance of helping public school boards manage legal costs without compromising access to experienced, high-quality legal services.

A critical part of our Compliance Assessment Services is helping our clients identify, correct, and prevent non-compliance with federal and state laws and regulations and Board policies and procedures, enabling our clients to focus on what matters most: delivery of a quality education to its students while minimizing risk by ensuring program compliance.

We have extensive experience assisting clients with matters involving compliance with federal and state law, including, but not limited to, the Family Educational Rights and Privacy Act (“FERPA”), the Individuals with Disabilities in Education Act (“IDEA”), Section 504 of the Rehabilitation Act of 1973 (“Section 504”), Title IX of the Education Amendments of 1972 (“Title IX”), the Americans with Disabilities Act (“ADA”), and the Immigration Reform and Control Act of 1986 (“IRCA”). We provide our clients with the knowledge and tools they need to function in full compliance with laws, regulations and policies. We take pride in providing clear, practical guidance that identifies and addresses problems efficiently and effectively, prevents future problems from occurring, and enables CMS to make sound decisions.

Enclosed with this proposal are materials outlining our qualifications, the key personnel who would serve the district, our experience with public school clients, and our proposed fee

structure. We welcome the opportunity to provide any additional information the Board may need as it moves through its selection process.

Sincerely,

Katie G. Cornetto

Rachel P. Nicholas

Grace S. Pennerat

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Firm Overview

HISTORY AND EXPERIENCE

Poyner Spruill LLP, founded in 1986 with the merger of two well-established North Carolina firms, is a Firm of approximately 90 attorneys with offices in Charlotte, Raleigh, Rocky Mount, and Southern Pines.

Poyner Spruill, a southeastern-based law firm with a national reach, represents clients throughout the United States. Poyner Spruill's Education Law Practice Group provides personal, experienced, and energetic counsel to public school systems and school boards throughout the state. The Firm's Education Law Practice Group represents its clients in a wide range of needs, including board leadership, student matters, personnel disputes, employment contracts, administrative hearings, trial advocacy, appellate advocacy, special education, finance and accounting, property acquisition, construction contracts, policy development, bond and vehicle forfeitures, and other related issues.

Poyner Spruill has a well-earned reputation for providing prompt, cost-effective, and professional legal services. We endeavor to match the resources of the Firm with the needs and budgetary constraints of clients. This strategy enables us to assist clients effectively and efficiently in connection with a wide range of legal needs and transactions.

The Poyner Spruill Education Law Practice Group is comprised of eleven attorneys with a variety of experience. With this bench depth, we are well-positioned to serve the Charlotte-Mecklenburg Board of Education.

Key Personnel

YOUR LEGAL SERVICES PARTNERS

Katie G. Cornetto, Rachel P. Nicholas, and Grace S. Pennerat will serve as the project's key personnel. You will find on the following pages detailed information requested in the District's RFI, including, but not limited to, the educational and professional background, as well as licensures, certifications, honors, and professional associations for each team member.

These attorneys will be primarily responsible for the services requested by CMS and may, as needed, engage other members of the Firm for specific tasks, including clerical and support staff. In addition to these primary team members, CMS can expect the Firm to leverage all available resources necessary to complete the requested legal services.

Poyner Spruill has an eleven-person team fully dedicated to serving our education clients. To learn more about our full team, visit our website: <https://www.poynerspruill.com/for-businesses/education/>. The Firm has offices in Charlotte, Raleigh, Rocky Mount, and Southern Pines, ready to serve CMS.

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OFFICE LOCATION

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JURISDICTIONS LICENSED

North Carolina

Katie focuses her practice exclusively on education law and has been engaged in a wide array of legal issues at the national, state, and local levels of education. In addition to spending several years representing local boards of education across the state, she served as the lead in-house general counsel to the N.C. State Board of Education and Department of Public Instruction for almost ten years.

EXPERIENCE

Katie brings her passion for education and desire to see the best outcomes for school boards of education, educators, and students to her practice. Before attending law school, she previously taught high school civics for the Close Up Foundation in Washington, D.C. and Honolulu, Hawaii. Katie conducts training for school boards and administration and is a frequent presenter on topics such as Social Media and the First Amendment; Teacher Ethics and Licensure; School Board Governance; Charter Schools; Virtual Public Schools; and many other subjects for local, state, and national audiences. She has served on numerous volunteer non-profit boards, task forces, and commissions involving public education and law. She was appointed by the N.C. State Board of Education to be a Board Member on the N.C. Virtual Public School Advisory Board. She is the Past President of the National Council of State Education Attorneys and a former member of the governing board for the National Association of State Boards of Education.

EDUCATION

The University of North Carolina at Chapel Hill, B.A.
North Carolina Central University School of Law, J.D.

PROFESSIONAL & COMMUNITY ACTIVITIES

Ann L. Majestic Distinguished Service Award 2026, Education Law Section, NC Bar
NC Virtual Public School Advisory Board/NC State Board of Education, Member
National Council of State Education Attorneys, Past President
Governing Board, National Association of State Boards of Education, Past Member

Rachel Nicholas

PARTNER

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JURISDICTIONS LICENSED

North Carolina

Rachel assists public school systems throughout the state. She focuses her practice exclusively on education law. Before pursuing a legal career, Rachel taught second grade in Rocky Mount, North Carolina, through Teach For America.

EXPERIENCE

Rachel has represented public school boards for over a decade primarily in matters relating to the IDEA, Section 504, FERPA, and student discipline. She defends special education due process actions in the North Carolina Office of Administrative Hearings, special education disputes in federal district court and the Fourth Circuit Court of Appeals, and complaints brought before the North Carolina Department of Public Instruction and the United States Department of Education's Office for Civil Rights.

Rachel empowers public schools to be proactive in mitigating legal risk. To this end, she frequently presents to local, statewide and national audiences on the procedural requirements of the IDEA and Section 504. In January 2026, Rachel launched her limited-series podcast entitled, [S.O.S.--Strategies for Operation Special Education](#). On this show, Rachel interviews education experts about strategies to mitigate special education operational challenges including staffing shortages.

EDUCATION

University of North Carolina at Chapel Hill, J.D., 2014

University of North Carolina Greensboro, B.A., 2009

PROFESSIONAL & COMMUNITY ACTIVITIES

Host of Limited Series Podcast, "S.O.S. Strategies for Operation Special Education"

North Carolina Council of School Attorneys, Member

National Council of School Attorneys, Member

North Carolina Bar Association Education Law Section, Chair (2024-25)

Grace Sykes Pennerat

PARTNER

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OFFICE LOCATION

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JURISDICTIONS LICENSED

North Carolina

Grace Sykes Pennerat advises local boards of education, superintendents, and central office personnel regarding student, employee, and community matters. Grace also assists clients with employment- and family-based immigration matters.

EXPERIENCE

Grace regularly presides over routine and special board meetings and committee meetings for local boards of education. She also advises local Boards of Education, superintendents, and central office personnel regarding student, employee, and community matters. She frequently presents to education organizations about the current state of education law and is a trained Title IX investigator and decision maker. Grace was recognized in The Best Lawyers in America® “Ones to Watch” for Education Law in 2024.

EDUCATION

Wake Forest University School of Law, J.D., 2017

University of North Carolina at Chapel Hill, B.A. (Political Science and Global Studies and a minor in Art History), 2013

PROFESSIONAL & COMMUNITY ACTIVITIES

American Immigration Lawyers Association, Member

National Association of College and University Attorneys, Member

Wake County Bar Association, Member

North Carolina Bar Association Education Law Section, Member

NOTABLE ACCOMPLISHMENTS

Recognized in The Best Lawyers in America® “Ones to Watch” (Education Law) 2024-2026

Ranked among Super Lawyers magazine’s North Carolina “Rising Stars”, 2025

Team Experience

BOARD, SCHOOL SYSTEM, AND STUDENTS

We are driven by our desire to see the best outcome for the Board, its school system, and its students. We work with the Board to provide educational opportunities for students and remove barriers to education.

Some legal issues that our attorneys routinely address in school systems include:

- Federal and State Civil Rights Laws Affecting Public Schools
- Exceptional Children
- Discrimination, Harassment, and Bullying (Title IX-Sexual Harassment)
- School Personnel Issues (tax issues pertaining to wages and benefits)
- Personnel Discipline for Classified and Certified Employees
- Student Discipline
- Student Transportation
- NC State Board of Education Policy/Regulation Compliance
- Technology Issues
- Inter-Scholastic Athletics
- Testing Compliance
- Free Speech and Civil Rights Laws and Issues
- Social, Emotional, and Mental Health Services
- School Safety
- Tort Liability of School Districts and Officials
- Board Governance

Although we address many of the common concerns, we also recognize that things are ever-changing, and that issues and needs can vary greatly among our public school districts. We believe the key to the best possible outcomes for students lies with well-trained boards, educators, and administrators. Our team has served districts across the state and can identify potential changes in programming and solutions. We share these resources with our clients. We offer training and support on a myriad of topics including:

- Schools and Religion
- Searches and Seizures
- Testing Ethics
- Student Enrollment and Custody
- Safe Schools Acts
- Random Drug Testing of Students in Extracurricular Activities
- Office for Civil Rights, Department of Education, and Equal Employment Regulations
- Sexual Harassment (Title IX)
- Social Media's Impact on Schools
- Protests, Free Speech, and School Safety
- Legal Strategies for Dealing with Highly Disruptive Students
- Immigration

BOARD LEADERSHIP

Local Boards of Education face challenges and have opportunities unique to their individual size and resources. The Poyner Spruill Education Law Practice Group is comprised of attorneys with decades of experience advising and representing local Boards of Education. Our team understands the sometimes overwhelming list of duties and responsibilities that fall on local Boards of Education.

Local Boards of Education have chosen our attorneys to assist with advice, training, and consultation on the general and specific duties of a local Board of Education, including compliance with the Open Meetings Law, Public Records Law, and closed session discussions, as well as a wide array of state and federal confidentiality laws. The team has extensive experience dealing with constitutional law questions involving the separation of church and State, moments of silence, prayers, use-of-facilities issues, Establishment Clause issues, Free Exercise Clause issues, due process, and equal protection claims.

We are dedicated to teaching and training our client school boards and their administrators to avoid problems and practices that might result in liability. Our attorneys work closely with our clients to establish practical and useful training and education. We believe strongly in preventive practices and pragmatic training. We have extensive experience offering workshops and training sessions for school employees, administrators, and Board members in virtually every area of education law and remain available to you 24/7 beyond training sessions as issues arise on these topics.

PERSONNEL, EMPLOYMENT LAW, AND CONTRACTS

We understand the rapidly changing nature of personnel and employment law in North Carolina school law. Our attorneys assist clients with defending Boards against employment discrimination claims based on State or federal law (Titles VI and VII of the Civil Rights Act, the Age Discrimination in Employment Act, the Americans with Disabilities Act, and Title IX of the Education Amendments of 1972); advising and representing school districts in disciplinary proceedings against teachers, administrators, and other school district personnel pursuant to North Carolina law. We have also advised clients regarding wage and hour as well as tax issues for school personnel.

ADMINISTRATIVE HEARINGS, TRIAL ADVOCACY, AND APPELLATE ADVOCACY

Clients trust our attorneys to take the lead on their most important legal challenges. Our attorneys have extensive trial and appellate experience in all levels of State and federal courts and before the various administrative hearing bodies significant to school systems.

We have advised clients on a variety of issues when it comes to these proceedings, including: Tort Liability; employment litigation; Title VII (EEOC); discrimination; sexual harassment; Title IX (OCR); First Amendment cases (speech, religion); teacher nonrenewal and dismissal; student suspensions; student injuries; students with disabilities; school construction; transferring bond funds; school budgets; school mergers; school closings; assaults; undercover

drug operations; searches and seizures; weapons on campus; bond and vehicle forfeitures; use of parking fines for public schools; environmental penalties; distribution of tax funds; Fourteenth Amendment and §1983 (civil rights) cases; desegregation and unitary status cases; workers' compensation; vehicular injuries; and the Voting Rights Act.

SPECIAL EDUCATION

One of the most highly litigated areas for school districts, nationally and locally, is special education. We value close relationships with our clients and know the best defense to a legal claim and its related costs is to avoid the claim in the first place.

We provide our clients with advice and strategies for avoiding liability, and counsel that is not only legally sound, but also operationally practical.

We handle matters involving special education for school districts throughout the state, including special education grievances; rights of students under the Individuals with Disabilities Education Act ("IDEA"), and the Americans with Disabilities Act (ADA), as well as Section 504 of the Rehabilitation Act of 1973. We have experience representing school districts in Individual Education Plan ("IEP") meetings, before the Office of Administrative Hearings, and court systems in these matters.

FINANCE AND ACCOUNTING

Our team has a comprehensive understanding of all matters relating to the School Budget and Fiscal Control Act, federal and State pass-through or matching funding programs (e.g. - Title I, vocational funds, exceptional children's funds), and other aspects relating to finance and accounting.

The Education Law Practice Group has previous experience including:

- Representing many school boards in successful litigation with boards of county commissioners over local current expense and capital outlay funds and use of the local sales taxes and lottery funds
- Representing boards in negotiations with State and federal officials during and following audits, involving audit exceptions, orders for reimbursement, embezzlement, recordkeeping, and other similar circumstances
- Working closely with school finance officers on a variety of matters dealing with preventive practices, internal audits, checks and balances, and individual school accounts
- Working with school purchasing requirements, bidding, the uniform budget format, and the required State reporting systems
- Working to finance public school building projects through certificates of participation (COPs) and public school bond issues, including such matters as the procedure and resolutions of a Board of Education to seek bond approval for school projects, and the procedure and resolutions of a Board of Education to transfer bond monies from one project to another

PROPERTY ACQUISITION, CONSTRUCTION, AND CONTRACTS

Our attorneys understand the unique challenges that arise when dealing with the property of the people and the obligations that come with being a public entity, both statutory and otherwise. We have experience in all methods of property acquisition and disposal including:

- Eminent domain negotiations and litigation
- Easements
- Right-of-way
- Lease agreements

We are well versed in all phases of school construction. Our experience with large construction projects and school bond projects includes negotiating and enforcing contracts with construction management companies, construction management at-risk, architects, contractors, and sub-contractors; bids and bid openings (including single-prime and multi-prime bids); and MBE (Minority Business Enterprises) policies and practices.

Our attorneys also have experience in all types of contracts involving public schools, including:

- Architect and construction contracts
- Joint use agreements
- Purchase agreements
- Instructional television fixed service licenses and agreements
- Publication and royalty agreements
- Intellectual property rights

POLICY WORK

With constant and accelerating change, school boards encounter ever-widening obstacles to their success. They need legal guidance from a law firm that understands the challenges they face and can fashion responses to meet their needs. Our team has previously developed model policies to anticipate or respond to new legislation and emerging legal issues for many school boards. We work cooperatively with boards to develop legally sound and effective policies tailored to the Board's mission, goals, and objectives.

Proposed Approach and Sample Deliverables

The Compliance Assessment Services (“CAS”), including its scope and depth, will be tailored to the unique needs and priorities of the Board. Our Team is prepared to review the Board’s policies and the District’s procedures and practices from the designated time period, as they relate to the following:

- Individuals with Disabilities Education Act (“IDEA”)/Section 504 of the Rehabilitation Act of 1973 (“Section 504”)
- Americans with Disabilities Act (“ADA”), specifically applied to students, employees and members of the public
- Family Educational Rights and Privacy Act (“FERPA”)
- Title IX of the Education Amendments Act of 1972 (“Title IX”)
- Article 27 of Chapter 115C of the North Carolina General Statutes (“State Student Discipline Statute”)
- Article 33c of Chapter 143 of the North Carolina General Statutes (“Open Meetings Law”)
- Chapter 132 of the North Carolina General Statutes (“Public Records Law”)
- Occupational Safety and Health Act of 1970 (“OSHA”)
- Immigration Reform and Control Act (“IRCA”), Illegal Immigration Reform and Immigrant Responsibility Act (“IIRIRA”), and Article 2 of Chapter 64 of the North Carolina General Statutes (“Verification of Work Authorization”)
- The School Budget and Fiscal Control Act

The CAS may also include a review of the Board’s standard terms and conditions for its vendor agreements, an evaluation of the Board’s procurement procedures, and an evaluation of the Board’s policies and practices pertaining to other laws the Board may wish to prioritize.

Consistent with the RFI, the assessment would include a focused review of policies, procedures, and practices within the District’s Human Resources and Finance departments, as well as any other departments or operational areas identified collaboratively with the Board as necessary based on risk, priority, or available resources.

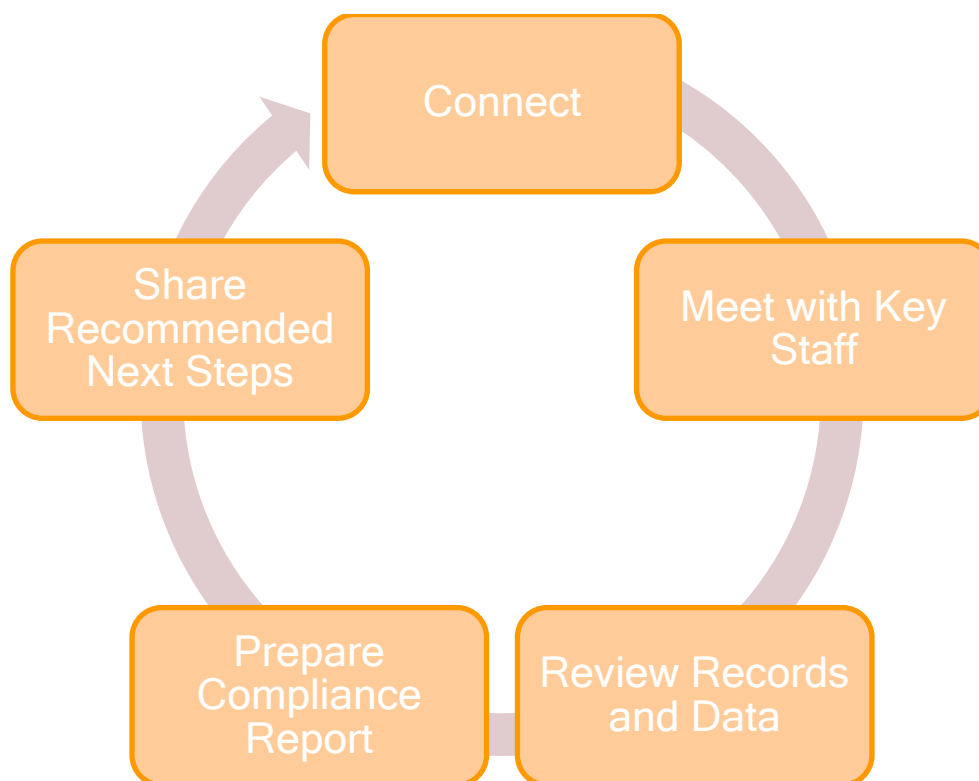
With additional information regarding the Board’s priorities, areas of concern, desired level of depth, and budget parameters, we would work collaboratively with the Board to refine and tailor the scope. This may include prioritizing high-risk or high-impact compliance areas rather than conducting an exhaustive review of all legal domains, allowing the assessment to focus on what matters most to the Board.

Methodology

Due to client confidentiality and work-product considerations, our firm provides an overview of what the CAS deliverable would include based on the information provided in the RFI. We anticipate that any compliance report produced as a result of our analysis would be tailored to the final agreed-upon scope and would generally include:

1. Identification of stakeholders interviewed or consulted
2. A summary of documents, data, and records reviewed
3. Identification of potential legal or policy compliance gaps and associated risk areas
4. Practical, prioritized recommendations for corrective action, if appropriate, such as targeted training, policy or procedural revisions, or development of guidance materials or handbooks

Any report would be designed to be practical and action-oriented, with recommendations calibrated to the District's operational realities and budgetary constraints. Where appropriate, we would also outline a phased or prioritized corrective action plan to support implementation.



Cost Proposal

RATES

We recognize the budgetary constraints facing boards of education and understand that legal fees must be balanced against competing operational demands. At the same time, education law is complex and presents meaningful risks of liability, not only to the Board and the school district but also to individual employees and Board members.

Our approach is to provide high-quality, practical legal services while keeping value to our clients as a foremost consideration.

Title	Rate
Attorney	\$450.00

Time is recorded in tenths of an hour. In addition, the Firm has a flat administrative expense charge of \$11.50 per billed hour, calculated in lieu of charges for telephone, photocopying, postage, facsimile, and other typical administrative expenses. As a local law firm with an office in Charlotte, we will not charge travel expenses to conduct business within the school district.

ESTIMATED TIMELINE FOR COMPLETION

Based on a comprehensive compliance review, the estimated timeline for completion is approximately six months from the project start date. Projected timelines are subject to change depending on the final scope of work and any issues identified during the assessment. Regardless of scope, we will provide the Board with regular monthly updates regarding the status and progress of the assessment.

ESTIMATED COST OF ASSESSMENT

The total cost of the compliance assessment will vary depending on the final scope, number of departments included, volume of materials reviewed, and level of stakeholder engagement requested. Consistent with the purpose of the RFI, we anticipate refining our cost estimate once we have additional information regarding the Board's priorities and budget parameters.

We are committed to working collaboratively with the Board to identify common ground between budget, risk mitigation, and value, and to structure an assessment that focuses on the areas of greatest importance to the Board rather than defaulting to an exhaustive review.

Representative Clients

CLIENT NAME	FIRM ROLE	DATES OF SERVICE
Anson County Schools	Special Counsel	November 2021 – present*
Asheboro City Schools	Special Counsel	November 2021 – present*
Charlotte-Mecklenburg Schools	Special Counsel	January 2026 - present
Clinton City Schools	Board Attorney	September 2022 - present
Dare County Schools	Board Attorney	July 2022 – present*
Franklin County Schools	Special Counsel	November 2021 – present*
Greene County Schools	Special Counsel	November 2021 – present*
Hickory City Schools	Special Counsel	March 2026 - present
Hoke County Schools	Board Attorney	September 2023 - present
Johnston County Public Schools	Board Attorney	October 2022 - present
Kannapolis City Schools	Board Attorney	November 2021 – present*
Lexington City Schools	Special Counsel	September 2024 - present
Martin County Schools	Board Attorney	November 2021 – present*
Montgomery County Schools	Special Counsel	November 2021 – present*
New Hanover County Schools	Special Counsel	March 2024 - present
Onslow County Schools	Board Attorney	March 2024 – present Special Counsel Spring 2022-March 2024
Pamlico County Schools	Board Attorney	November 2021 – present*
Pender County Schools	Board Attorney	November 2021 – present*
Rockingham County Schools	Board Attorney	September 2022- present
Sampson County Schools	Special Counsel	November 2021 – present*
Wilson County Schools	Board Attorney	October 2021 – present*

* THE MEMBERS OF THE POYNER SPRUILL EDUCATION LAW PRACTICE GROUP HAD PREVIOUSLY REPRESENTED EACH OF THESE BOARDS FOR MANY YEARS

List of References

Below please find a list of references.

<p>Elbert Garvey, Chairperson Onslow County Board of Education Email: elbert.garvey@onslow.k12.nc.us Phone: 910-455-2211</p>	<p>Dr. Christopher Barnes, Superintendent Onslow County Schools Email: chris.barnes@onslow.k12.nc.us Phone: 910-455-2211</p>
<p>Don Hall, Chairperson Pender County Board of Education Email: don_hall@pender.k12.nc.us Phone: 910-200-2217</p>	<p>Dr. Brad Breedlove, Superintendent Pender County Schools Email: William_breedlove@pender.k12.nc.us Phone: 910-604-2339</p>
<p>Lyn Andrews, Chairperson Johnston County Board of Education Email: lynandrews@johnston.k12.nc.us Phone: 919-609-9413</p>	<p>Dr. David -Pearce, Superintendent Johnston County Public Schools Email: davidpearce@johnston.k12.nc.us Phone: 919- 934-6031</p>
<p>Blake Boykin, Chairperson Wilson County Board of Education Email: blake.boykin@wilsonschooolsnc.net Phone: 252-991-6561</p>	<p>Dr. Lane Mills, Superintendent Wilson County Schools Email: lane.mills@wilsonschooolsnc.net Phone: 252-649-5359</p>
<p>David Twiddy, Chairperson Dare County Board of Education Email: twiddyda@daretolearn.org Phone: 252-473-7533</p>	<p>Steve Basnight, Superintendent Dare County Schools Email: basnightst@daretolearn.org Phone: 252-480-8888</p>