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April 20, 2026

Anna Hehenberger  
Charlotte-Mecklenburg Board of Education  
Sent via email: [annam.hehenberger@cms.k12.nc.us](mailto:annam.hehenberger@cms.k12.nc.us)

RE: RESPONSE TO REQUEST FOR INFORMATION (RFI: 163-0410261GB);  
Compliance Assessment Services

Dear Ms. Hehenberger:

On behalf of HEC Partners, LLC, we appreciate the opportunity to submit information in response to Request for Information (RFI) 163-0410261GB regarding Compliance Assessment Services for the Charlotte-Mecklenburg Board of Education (“CMS”). We commend CMS’s proactive approach to evaluating its compliance with federal and North Carolina public school legal requirements and are pleased to provide information regarding our qualifications, methodology, and capabilities.

HEC Partners, LLC is a compliance-focused consulting firm with extensive experience supporting K–12 school districts, higher education institutions, and public agencies in evaluating and strengthening compliance with federal and state regulatory frameworks. Our work includes comprehensive compliance assessments across functional areas such as Human Resources, Finance, Student Services, and institutional governance, with particular expertise in federal education laws including IDEA, Title IX, FERPA, Section 504, and related requirements. In fact, our Chief Legal Officer has served as an expert witness in Title IX litigation and has served as special counsel and a special investigator for K-12 districts with employment-related matters, Title IX matters, and Department of Education Office for Civil Rights investigations.

We understand that CMS seeks to conduct a thorough evaluation of its policies, procedures, and practices to identify areas of risk and ensure alignment with applicable legal standards. Our approach is designed to provide not only a detailed assessment of current compliance posture, but also practical, actionable recommendations that can be implemented effectively across the district. We emphasize a collaborative process that includes stakeholder engagement, data-driven analysis, and clear, defensible reporting.

HEC Partners, LLC brings a multidisciplinary team that combines legal expertise, operational knowledge, and public-sector experience. Our methodology integrates document review,



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stakeholder interviews, compliance benchmarking, and risk assessment to deliver a comprehensive evaluation and a structured corrective action plan, where appropriate. Our goal is to support CMS in strengthening compliance, improving operational consistency, and enhancing overall organizational effectiveness. We perform our services both on-site as well as in a virtual environment. Our fee schedule includes up to three (3) scheduled visits to the District for up to one week's time, each.

We welcome the opportunity to provide additional detail regarding our experience, methodology, and sample deliverables, and to discuss how our team can support CMS in achieving its compliance objectives. Thank you for your consideration.

If you have any questions, please do not hesitate to contact Melissa Flores at [Melissa@hecpartners.com](mailto:Melissa@hecpartners.com) or 801-557-1657. Thank you for considering HEC as your compliance provider. We look forward to the possibility of working together to achieve mutual success.

Sincerely,

*Annette Linders*

Annette Linders, CEO  
Higher Education Compliance Partners, LLC.



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## 1. Company Overview & Relevant Experience

Higher Education Compliance Partners, LLC (HEC Partners) is a regulatory compliance consulting firm specializing in K–12 and higher education legal and operational compliance. Our team is led by experienced regulatory attorneys and compliance professionals with deep expertise in the following areas, specific to K-12.

### **K-12 Federal Regulations**

#### Civil Rights & Anti-Discrimination

##### Title VI of the Civil Rights Act of 1964

Prohibits discrimination based on race, color, or national origin and religion tied to an ethnic identity

##### Title IX of the Education Amendments of 1972

Prohibits sex discrimination (includes sexual harassment, athletics, pregnancy)

##### Section 504 of the Rehabilitation Act of 1973

Prohibits disability discrimination in federally funded programs

##### Americans with Disabilities Act (ADA)

Broad disability discrimination law (Title II applies to public schools)

##### Age Discrimination Act of 1975

Prohibits age discrimination in federally funded programs



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Student Records & Privacy

Family Educational Rights and Privacy Act (FERPA)

Governs access to and disclosure of education records

Protection of Pupil Rights Amendment (PPRA)

Governs surveys and collection of sensitive student information

Special Education & Student Services

Individuals with Disabilities Education Act (IDEA)

Governs special education services, IEPs, FAPE, LRE

Every Student Succeeds Act (ESSA)

Federal K–12 accountability and funding law (replaced NCLB)

School Safety & Student School Safety & Student Welfare

Gun-Free Schools Act

Requires expulsion for firearm possession (with exceptions)

Safe and Drug-Free Schools and Communities Act

Addresses drug and violence prevention programs

McKinney-Vento Homeless Assistance Act

Ensures educational access for homeless students

Child Abuse Prevention and Treatment Act (CAPTA)

Sets standards for reporting child abuse and neglect



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Student Populations & Equity

Equal Educational Opportunities Act of 1974 (EEOA)  
Requires schools to address language barriers (ELL/ESL)

Migrant Education Program (Title I, Part C of ESSA)  
Supports migratory children

Health, Nutrition, and Student Support

National School Lunch Act  
Governs school meal programs

Child Nutrition Act  
Expands nutrition programs (breakfast, milk, etc.)

Technology & Accessibility

Section 508 of the Rehabilitation Act  
Digital accessibility requirements

Children's Internet Protection Act (CIPA)  
Requires internet filtering for schools receiving E-Rate funding

Employment & Workplace (Impacting Schools)

Fair Labor Standards Act (FLSA)  
Wage and hour requirements

Family and Medical Leave Act (FMLA)



Employee leave protections

Americans with Disabilities Act (ADA) Title I  
Employment discrimination protections

### **State Level Education Regulatory Frameworks**

Institutional risk management and compliance program design  
Enterprise compliance assessments  
Policy and procedure audits  
Civil rights compliance reviews  
Financial aid and administrative compliance evaluations  
Governance and operational risk assessments

#### North Carolina General Statutes (NCGS)

NCGS §115C – Governs public education system  
Teacher employment, discipline, student rights

#### State Board of Education Policies

Student conduct and discipline  
Equity and nondiscrimination  
Graduation and curriculum standards

#### North Carolina Administrative Code (NCAC)

Special education implementation (IDEA alignment)  
Charter and public school operational rules

#### North Carolina DPI (Department of Public Instruction)

Compliance monitoring



Federal program oversight (Title I, IDEA)  
Data reporting requirements

Our compliance assessment framework is grounded in a comprehensive evaluation of federal and North Carolina legal requirements, integrating governance review, operational assessment, stakeholder engagement, and risk analysis. This approach enables identification of compliance gaps, prioritization of risk areas, and development of actionable, sustainable corrective strategies.

## 2. References

We have provided three (3) references highlighting our experience with comparable engagements and our ability to deliver effective, compliant solutions.

Client Institution	Contact Information
Millard School District	Randy Hunter District Office: 285 East 450 North, Delta, UT 84624 <a href="mailto:randy@millardk12.org">randy@millardk12.org</a> 435-864-1000
Alpine School District	Analís Carratini-Ruiz, Ph.D. 575 N. 100 E. American Fork, UT 84003 <a href="mailto:aruiz@alpinedistrict.org">aruiz@alpinedistrict.org</a> 801-647-8058
Society for the Advancement of Biology Education Research (SABER)	Jamie L. Jensen, PhD 4059 LSB 701 E. University Parkway Provo, UT 84602 <a href="mailto:jamie.jensen@byu.edu">jamie.jensen@byu.edu</a> 801-422-6896



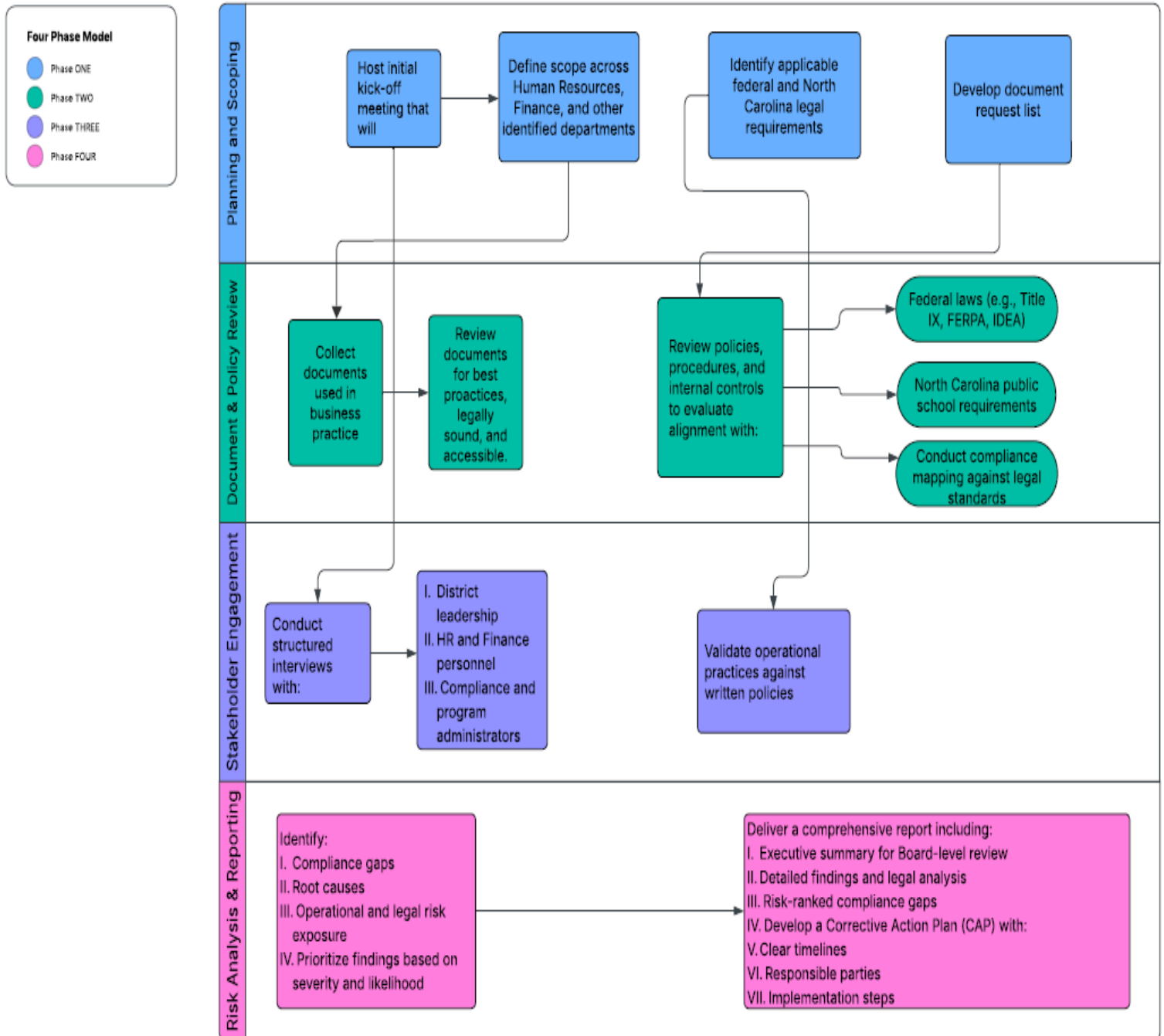


### 3. Proposed Methodology & Approach

HEC Partners, LLC employs a risk-based compliance assessment methodology that prioritizes areas of highest legal, operational, and reputational exposure while delivering practical, implementation-ready solutions. This approach integrates legal analysis, operational review, stakeholder engagement, and data-driven risk scoring to provide a comprehensive and defensible evaluation of compliance with applicable federal and state requirements. Our methodology rests on five core principles.

1. Risk Prioritization: We focus on high-impact compliance areas where there is the greatest risk of audit, compliance complaints, and legal exposure.
2. Legal + Operational Integration: Our methodology assesses both policy and real-world practice in order to identify specific areas of noncompliance or vulnerability.
3. Evidence-Based Analysis: We use documentation, data, and interviews to best understand how compliance operates in real-time. These interviews and data assist us in identifying operational challenges, training gaps, and communication breakdowns.
4. Actionable Outcomes: We synthesize the information collected and deliver implementable recommendations that are legally sound, operationally feasible, and scalable.
5. Sustainability: Our goal is to build systems that support ongoing compliance.

The following graphic outlines our approach to this project. We have also provided an outline of the four-phase approach.





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## Phase 1: Planning & Scoping

Initial kickoff with CMS leadership that will:

- a. Define scope across Human Resources, Finance, and other identified departments
- b. Identify applicable federal and North Carolina legal requirements
- c. Develop document request list

## Phase 2: Document & Policy Review

Review policies, procedures, and internal controls to evaluate alignment with:

- a. Federal laws (e.g., Title IX, FERPA, IDEA)
- b. North Carolina public school requirements
- c. Conduct compliance mapping against legal standards

## Phase 3: Stakeholder Engagement

Conduct structured interviews with:

- a. District leadership
- b. HR and Finance personnel
- c. Compliance and program administrators
- d. Validate operational practices against written policies

## Phase 4: Risk Analysis & Reporting

Identify:

- a. Compliance gaps
- b. Root causes
- c. Operational and legal risk exposure
- d. Prioritize findings based on severity and likelihood

## Phase 5: Deliverables & Action Planning

Deliver a comprehensive report including:

- a. Executive summary for Board-level review
- b. Detailed findings and legal analysis



- c. Risk-ranked compliance gaps
- d. Develop a Corrective Action Plan (CAP) with:
- e. Clear timelines
- f. Responsible parties
- g. Implementation steps

Sample Deliverables- *Sample deliverables can be provided upon request.*

HEC Partners provides structured, decision-ready deliverables, including:

Compliance Assessment Report

Executive summary

Department-specific findings

Legal/regulatory analysis

Risk Scorecard Dashboard (High / Medium / Low risk categorization)

Corrective Action Plan (CAP), where necessary

Action steps with timelines and ownership

Current vs. required state/federal standards

#### 4. Estimated Timeline

Phase	Duration
Planning & Scoping	3 weeks
Document Review	4-5 weeks
Stakeholder Interview	2–3 week



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Analysis & Reporting	4 weeks
Final Deliverables	3-4 weeks
<b>Total Estimated Timeline</b>	<b>16-19 weeks</b>

*Timeline may be adjusted based on scope and district availability.*

## 5. Estimated Cost

HEC Partners proposes a fixed-fee pricing structure in the range of **\$100,000 – \$120,000** for the requested compliance assessment. This pricing reflects a best-value approach that balances cost efficiency with the depth, rigor, and defensibility required for a large public school district such as Charlotte-Mecklenburg Schools (CMS).

Cost variables include:

Number of departments included

Depth of review required

Volume of policies and documentation

Stakeholder interview scope

A more refined cost proposal can be provided following scope clarification.

## 6. Pricing Justification & Value Proposition

The proposed fixed-fee pricing structure is based on the following:

A. Alignment with Market Conditions

Our proposed pricing is consistent with current market benchmarks for comparable K–12 compliance assessments in large urban districts, which typically range from \$80,000 to \$130,000 for full-scope reviews.



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### B. Scope-Driven Pricing Rationale

The proposed fee reflects the complexity and breadth of the requested engagement , including:

Multi-department review (Human Resources, Finance, and additional areas as needed)

Evaluation of compliance with federal and North Carolina legal requirements

Stakeholder interviews across operational and leadership levels

Identification of compliance gaps and associated legal and operational risks

Development of a comprehensive written report and corrective action plan

This scope requires a cross-functional team, including legal, compliance, and operational experts, as well as structured project management.

### C. Legal and Risk-Based Value

Unlike lower-cost, checklist-based assessments, HEC Partners provides a risk-informed, legally grounded analysis, which delivers identification of high-risk exposure areas (e.g., civil rights compliance, employment practices, financial controls), and documentation that supports defensibility in audits, complaints, or litigation.

This approach reduces long-term costs by helping CMS avoid regulatory penalties, mitigate litigation risk, and strengthen internal controls and governance.

### D. Deliverable Quality and Implementation Value

The proposed pricing includes high-value deliverables designed for immediate use by district leadership such as an executive-level summary for Board review, detailed compliance findings with legal analysis and risk-prioritized recommendations.

These deliverables go beyond identification of issues and support practical implementation, reducing the need for follow-on consulting engagements.

### E. Efficiency and Cost Control

HEC Partners leverages:

- a. Standardized compliance assessment frameworks



- b. Experienced personnel with K–12 expertise
- c. Streamlined data collection and analysis processes

This allows us to deliver a comprehensive assessment efficiently, without unnecessary cost escalation.

## 7. Key Personnel

<b>Lead Engagement Attorney / Compliance Director</b>	<b>Compliance Analysts &amp; Subject Matter Experts</b>	<b>Project Manager</b>
Regulatory attorney with extensive experience in: K–12 compliance Title IX investigations and program design ADA/504 compliance systems Experience advising public institutions on enterprise compliance risk	Specialists in: HR compliance Financial and administrative compliance Student services	Project Manager Oversees: Timeline adherence Deliverable coordination Stakeholder communication

## 8. Strengths & Differentiators

HEC Partners, LLC brings a uniquely integrated approach that combines legal expertise with operational execution, delivering not only compliance assessments but implementation-ready solutions tailored to educational environments. Our team has deep experience across both K–12 and higher education, enabling us to address the distinct regulatory, governance, and operational challenges faced by institutions. We employ a risk-based methodology aligned with Board-level oversight needs, prioritizing areas of highest exposure while ensuring practical, sustainable compliance strategies. Our deliverables go beyond identifying findings—we provide clear, actionable recommendations, tools, and frameworks that institutions can immediately



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operationalize. Importantly, HEC has a proven track record of translating complex legal and regulatory requirements into effective day-to-day practices, ensuring compliance is not only achieved but maintained.

## 9. Alignment with RFI Objectives

HEC Partners fully aligns with the objectives outlined in the RFI, including:

- Evaluating compliance with federal and North Carolina laws

- Identifying risk and noncompliance areas

- Providing actionable recommendations

- Delivering a written report

## 10. Contact Information

Melissa Flores, J.D., Ph.D.

Higher Education Compliance Partners, LLC

[Melissa@hecpartners.com](mailto:Melissa@hecpartners.com)

801-557-1657

## 11. Closing Statement

HEC Partners appreciates the opportunity to support the Charlotte-Mecklenburg Board of Education in strengthening its compliance framework. We are committed to delivering a thorough, defensible, and actionable assessment that enhances both legal compliance and operational effectiveness.