

Vander Weele Group^{LLC}

A Certified Woman-Owned
Business Enterprise

Response to:

**Charlotte-Mecklenburg Board of
Education**

for:

Compliance Assessment Services

RFI #: 163-0410261GB



April 24, 2026

Charlotte-Mecklenburg Board of Education
600 East Fourth Street
Charlotte, NC 28202

Dear Anna Hehenberger,

The Vander Weele Group^{LLC} is pleased to present this response to the Request for Information (RFI) from the Charlotte-Mecklenburg Board of Education (Board) for Compliance Assessment Services. Based on the team's strength and expertise in school system compliance monitoring and oversight, we are well qualified to support the Board, as the governing body for the public school district of Mecklenburg County, Charlotte-Mecklenburg Schools (CMS), in this critical oversight function.

We are a 23-year-old niche firm specializing in oversight, risk assessment, and program evaluation for publicly funded programs. Headquartered near Chicago, our multi-disciplinary team includes school, district, and state education agency (SEA) professionals, Certified Public Accountants (CPAs), Certified Internal Auditors (CIAs), Certified Fraud Examiners (CFEs), former Inspectors General, and a former federal prosecutor. This depth of expertise, rooted in our founding by a former Chicago Public Schools Inspector General, enables us to conduct evidence-based assessments aligned with Government Accountability Office (GAO) standards and Quality Standards for Inspection and Evaluation (QSI&E).

We have designed and implemented compliance monitoring frameworks for education agencies across more than 20 states, including large-scale federal grant programs. Our proposed Project Manager, Dr. Kristen Mokofisi, a former SEA program director, has deep practitioner-led experience working with the Individuals with Disabilities Education Act (IDEA), Title IX of the Education Amendments Act, and the Federal Educational Rights and Privacy Act (FERPA).

Protecting the integrity of publicly funded programs is our flagship mission. Our firm has supported oversight of more than \$34.5 billion in public funds across federal, state, and local programs. We bring extensive experience conducting compliance assessments across both rural and urban complex school district environments, including on-site and remote reviews involving stakeholder interviews, policy and documentation analysis, and operational walkthroughs. We apply a structured, risk-based approach that integrates fieldwork, data analysis, and quality assurance processes to ensure all findings are grounded in verifiable evidence and aligned with applicable standards.

We are particularly experienced in producing timely, accurate, and actionable reports that meet Inspector General expectations for clarity, independence, and evidentiary support. Understanding that this engagement requires both technical expertise and sensitivity to the operational realities of a large school district, our approach emphasizes collaboration and transparency. We ensure the receipt of a compliance assessment that empowers the Board to strengthen internal systems, mitigate risk, and support effective delivery.

We trust this response meets your expectations. Thank you for your time and consideration.

Sincerely,

Maribeth Vander Weele
President, Vander Weele Group^{LLC}
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I. COMPANY OVERVIEW AND RELEVANT EXPERIENCE

A. Firm Overview

The Vander Wee Group is a 23-year-old federally certified Woman-Owned Small Business (WOSB) and Disadvantaged Business Enterprise (DBE) specializing in compliance monitoring, oversight, and program evaluation for federally and state-funded programs.

Built on a foundation of education oversight, accountability, and reform, the firm was founded in 2003 by Maribeth Vander Wee, a former Inspector General for Chicago Public Schools and member of the district's management team. Today, we are a nationally recognized leader in grants oversight and compliance monitoring, with more than 45 staff members located across 15 states and the capacity to deploy teams on-site as needed.

We bring extensive experience supporting education systems through designing and executing compliance monitoring programs aligned with federal and state requirements. Our firm has developed monitoring frameworks for more than 30 education grant programs and conducted programmatic and fiscal monitoring reviews across more than 20 states. We have supported oversight of billions of dollars in public education funding, helping agencies strengthen internal controls, ensure regulatory compliance, and improve program performance.

Our approach is grounded in what we call “**Meaningful Monitoring™**,” a methodology that goes beyond checklist compliance to assess how policies and procedures function in practice. We evaluate not only alignment with legal and regulatory requirements, but also effective implementation, identifying gaps between policy and practice and the root causes of compliance risks.

Our core capabilities include:

- **Compliance Assessments and Monitoring Reviews:** Conducting on-site and remote reviews to evaluate adherence to federal, state, and local requirements, including policy analysis, documentation review, and stakeholder interviews
- **Organizational and Operational Assessments:** Observing program implementation, conducting site visits, and assessing internal processes across departments such as Human Resources and Finance
- **Data Collection and Analysis:** Analyzing program and operational data to identify trends, risks, and areas for improvement
- **Performance and Risk Assessments:** Evaluating program effectiveness and identifying compliance gaps, control weaknesses, and operational risks
- **Technical Assistance and Capacity Building:** Providing actionable recommendations, tools, and training to support sustainable compliance improvements
- **Audit Resolution and Corrective Action Planning:** Assisting the Board in remediating prior audit findings, developing sustainable corrective action plans, and establishing clear pathways to resolve regulatory deficiencies

B. Why Our Team?

The Vander Wee Group offers a practitioner-led, multidisciplinary team with deep expertise in education compliance, oversight, and program evaluation. Our team includes former

school, district, and SEA professionals, CPAs, CIAs, CFEs, former Inspectors General, former prosecutors, and public-sector program leaders. With more than 50 years of combined experience, the proposed key personnel bring both technical compliance expertise and practical knowledge of how education systems operate. Figure 1 reflects four key areas that set the Vander Wee Group apart from our competitors.

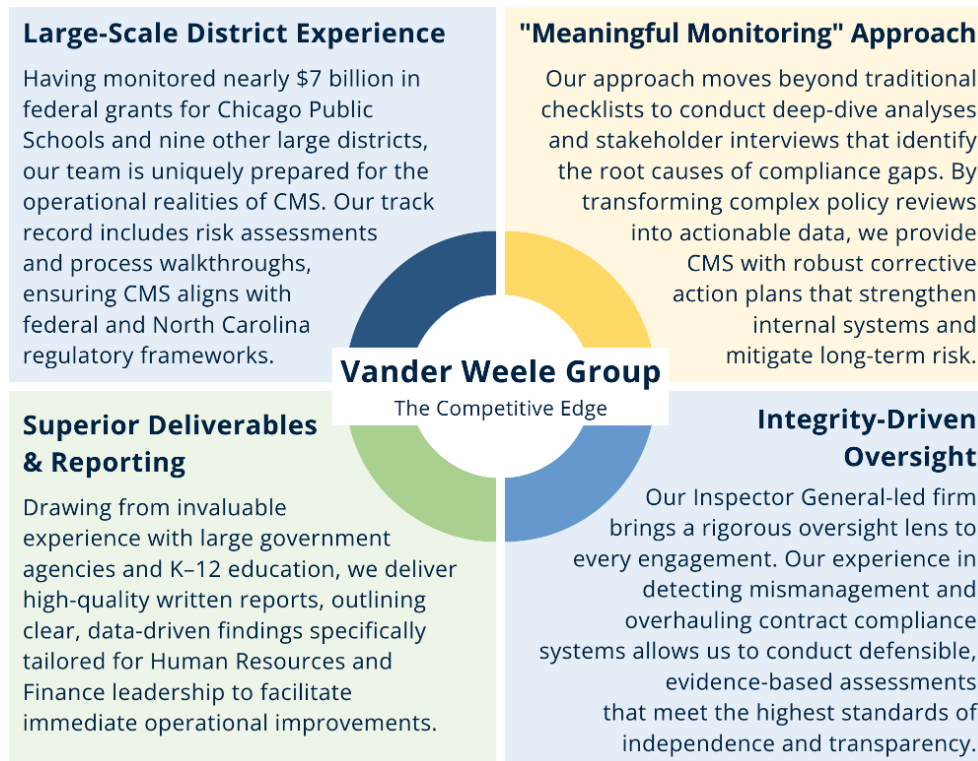


Figure 1. Competitive Edge.

Unlike traditional consulting firms, we are practitioners with hands-on experience conducting monitoring visits, compliance reviews, and risk assessments in real-world environments. This allows us to identify not only whether compliance gaps exist, but why they occur and how they can be effectively addressed. We are particularly well positioned to support Charlotte-Mecklenburg Schools due to our ability to:

- Conduct structured, risk-based compliance assessments across multiple departments, including HR and Finance
- Evaluate both policy alignment and real-world implementation
- Identify root causes of compliance gaps, not just surface-level issues
- Deliver clear, defensible reports tailored to both operational leaders and Board-level stakeholders
- Engage stakeholders effectively to ensure accuracy, transparency, and buy-in

C. Past Performance

The Vander Wee Group has extensive experience conducting compliance assessments, monitoring reviews, and oversight activities across federally and state-funded education programs. We have supported oversight of billions of dollars in education funding and have

worked with state education agencies and program administrators to strengthen compliance systems and improve program performance. Our reporting emphasizes clarity, accuracy, and usability, ensuring that findings translate into meaningful operational improvements.

Table 1 below highlights our firm's notable engagements we have performed that are relevant to this assignment.

Past Performance

Project: State of New Jersey, Department of Education (NJDOE)

Period of Performance (PoP): See below

Client Contact: Robert Amon, Director, Office of Budget and Accounting,
robert.amon@doe.nj.gov, (609) 376-3942

Project Description: The Vander Wee Group has partnered with the New Jersey Department of Education to provide comprehensive risk assessment and integrity monitoring services across three major programs:

- *Additional or Compensatory Special Education and Related Services (ACSERS) Program:* The firm monitored \$600 million in ARPA funds designated for services provided to students with disabilities. The team conducted a single-entity risk assessment of the department, followed by comparative risk assessments of individual school districts to prioritize monitoring. During fieldwork, the firm monitored the use of funds to determine the eligibility of students, allowability, and proper documentation in accordance with federal and state regulations.
PoP: October 2022-September 2024

- *New Jersey Learning Acceleration Program:* High-Impact Tutoring Grant: The firm was engaged to monitor more than \$50 million in grant funds allocated to LEAs to help students disproportionately impacted by the COVID-19 pandemic. The team conducted a risk assessment of the department's internal controls, policies, and procedures to ensure adequate systems were in place to detect, prevent, and investigate fraud and other integrity breaches.
PoP: January 2024-August 2026

- *Universal Pre-Kindergarten (UPK) Program:* To support the state's initiative to make full-day preschool universally available, the firm conducted risk assessments evaluating the department's organizational structure, capacity, internal controls, and previous audits. The engagement involved conducting individual district risk assessments and actively monitoring selected districts for grant compliance, eligibility, and vendor payment documentation.
PoP: October 2023-August 2024

Project: Illinois State Board of Education (ISBE): Multi-Year Risk-Based Monitoring Program

Period of Performance: May 2018–Present

Client Contact: Kristopher Pickford, Director, Federal and State Monitoring, (217) 782-1053,
kpickford@isbe.net

Project Description: Vander Wee Group created and executed a risk-based monitoring program that provides technical assistance and monitors the expenditure of federal grants distributed by ISBE to the Chicago Public Schools (CPS) School District 299. In 2020 and again in 2023, the state awarded our firm additional three-year contracts to monitor nine of the state's other large school districts in a manner similar to the CPS engagement. Our team reviews policies, procedures, and district-wide documentation to ensure individual schools and Central Office units comply with Title 2 U.S. Code of Federal Regulations, §200 (*Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*—"Uniform Guidance")

and other requirements of individual grant funds, ensuring we adhere to applicable education laws. If deficiencies are identified, we provide technical assistance and recommendations to remedy the issue and avoid future findings. From 2018 through 2023, CPS received \$4.9 billion in federal grants under review. Our team completed in-depth monitoring of \$678.8 million in grants expended at Chicago Public Schools for elementary, secondary, and early childhood education. In the first year, the team developed program infrastructure, reviewed grant distribution and management processes in three Central Office units, and—based on a large-scale comparative risk assessment—identified schools and Central Office units for monitoring. Between 2020 and 2023, we reviewed up to 13 different grant streams annually in 169 Detroit Public School Community District schools, 51 charter schools, 8 citywide units, and 37 central offices.

Project: North Dakota Department of Public Instruction

Period of Performance: March 2023 – December 2023

Client Contact: Rebecca Pollert, Assistant Director of Fiscal Management/Director of Strategic Operations, rpollert@nd.gov, (708) 328-2615

Project Description: The Vander Wee Group created and supported the implementation of a comprehensive monitoring plan for over 30 Federal and state grants. Our team developed a risk assessment process, grantee communication templates, fiscal and programmatic monitoring tools, and rigorous quality control processes to standardize oversight across discretionary, formula, and entitlement programs.

Table 1. Past Performance

II. PROPOSED METHODOLOGY AND APPROACH

A. Our Understanding

We understand that the Charlotte-Mecklenburg Board of Education is seeking an independent compliance assessment of Charlotte-Mecklenburg Schools (CMS), a large and complex public school district, to evaluate the implementation of applicable federal and North Carolina public school legal requirements. This review will focus on key functional areas, including Human Resources and Finance, as well as other departments as needed.

The engagement will involve reviewing policies, procedures, and practices; conducting stakeholder interviews; and assessing operational processes to identify compliance gaps and associated risks. The Board is seeking actionable recommendations, including a written report and, if necessary, a corrective action plan to strengthen compliance and support effective implementation across the district.

B. Phased Approach

The Vander Wee Group proposes a structured, risk-based, and evidence-driven approach to support the Board of Education in conducting a comprehensive compliance assessment of district policies, procedures, and practices. Our methodology is designed to evaluate both alignment with applicable federal and North Carolina public school requirements and the effective implementation in practice, ensuring that findings are actionable and operationally relevant.

Quality assurance and stakeholder collaboration are embedded across all phases of our approach. We will maintain ongoing communication with the Board throughout the engagement to ensure transparency and alignment. All work products will undergo internal quality review for accuracy, consistency, and defensibility.

Our approach is organized into three core phases: (1) Planning and Risk-Based Scoping, (2) Fieldwork and Compliance Assessment, and (3) Analysis, Reporting, and Recommendations.

Phase 1: Planning and Risk-Based Scoping

In Phase 1, the Vander Wee Group establishes the foundation for a targeted and efficient assessment by identifying key compliance requirements and prioritizing areas of risk.

Key activities include:

- Conducting initial coordination meetings with the Board leadership to confirm scope, priorities, and areas of concern.
- Identifying applicable federal and North Carolina regulatory frameworks (e.g., *IDEA*, *Title IX*, *FERPA*).
- Creating tailored compliance matrices and assessment tools to guide consistent evaluation.
- Developing a **risk-based assessment plan** focused on high-impact areas, including Human Resources, Finance, and other departments as needed.

This phase ensures that the assessment is aligned with the Board's operational environment and focused on areas of greatest compliance risk and organizational importance.

Phase 2: Fieldwork and Compliance Assessment

In Phase 2, our team conducts a comprehensive review of policies, processes, and practices to assess both compliance and implementation.

Key activities include:

- **Stakeholder Interviews:** Conducting structured interviews with personnel across HR, Finance, and other relevant departments to understand roles, processes, and challenges.
- **Process Walkthroughs:** Reviewing workflows and internal controls to evaluate how policies are operationalized in practice.
- **Documentation Review:** Examining records, procedures, and supporting documentation to verify compliance with applicable requirements such as:
 - Verifying that the district has a written policy regarding the protection of student education records and that it defines directory information clearly.
 - Confirming that an annual notice is sent to parents and eligible students regarding their rights to inspect records and opt out of directory disclosures.
 - Reviewing HR records to ensure staff who handle student data have completed FERPA training within the last 12 months.
 - Confirming that the district has designated at least one employee as the Title IX Coordinator and that their contact information is public.
 - Reviewing the district's written grievance procedures to ensure they provide for a prompt and equitable resolution of sex discrimination complaints.
 - Verifying that the required Title IX training materials for coordinators and investigators are posted on the district website.
 - Testing financial records to ensure the district is maintaining the required level of state and local funding for special education as compared to the previous year.
 - Auditing physical and digital storage areas to ensure that records related to evaluations and services for children with disabilities are secure.
 - Verifying that the district's internal procurement policies reflect the \$90,000 threshold for competitive bidding as required by North Carolina General Statute.
 - Verifying that the Board-approved self-certification documentation exists and includes a justification and risk assessment if the district has raised its micro-purchase threshold above \$10,000.
 - Reviewing the "Audit Resolution" process for state and federal grants to ensure prior deficiencies identified by the North Carolina Department of Public Instruction (NCDPI) have been remedied through a formal corrective action plan.

Our approach integrates qualitative and quantitative analysis to ensure we thoroughly understand compliance performance. We focus not only on whether policies exist, but whether they are consistently and effectively implemented across the district.

Phase 3: Analysis, Reporting, and Recommendations

In Phase 3, the Vander Weele Group synthesizes findings to identify compliance gaps, assess risk, and develop actionable recommendations.

Key activities include:

- Identifying areas of noncompliance and gaps between policy and practice.
- Conducting **root cause analysis** to determine underlying drivers of compliance issues (e.g., training gaps, process inefficiencies, resource constraints).
- Developing **risk-ranked findings** (e.g., high, medium, low) based on potential impact and likelihood.
- Preparing a comprehensive written report outlining methodology, findings, and supporting evidence.
- Developing **practical, prioritized recommendations** and, if necessary, a corrective action plan with suggested timelines and responsible parties.
- Conducting validation discussions with the Board and CMS stakeholders to ensure accuracy and contextual alignment.

Final deliverables will be clear, structured, and tailored to both operational leadership and Board-level stakeholders. All findings will be supported by verifiable evidence and align with applicable oversight standards.

III. TIMELINE

The Vander Wee Group anticipates completing the compliance assessment within an agreed timeframe coordinated with the Board and aligned with district priorities, staff availability, and document access. Our timeline is structured yet flexible, allowing for a comprehensive review of policies, procedures, and practices across key functional areas, including Human Resources and Finance, while ensuring timely delivery of findings and actionable recommendations.

The proposed timeline outlined in **Table 2** below identifies key milestones and deliverables across each phase of the engagement. During project initiation, we will work with the Board to refine a detailed workplan that reflects operational considerations, minimizes disruption to staff, and ensures efficient execution.

Phase	Milestone	Timeframe
Phase I – Planning & Risk-Based Scoping	Project kickoff and coordination with the Board	Week 1
	Consult initial stakeholders to confirm scope and priority areas	Weeks 1-2
	Identify applicable federal and North Carolina requirements	Weeks 1-3
	Develop risk-based assessment plan and compliance review framework	Weeks 3-4
Phase II - Fieldwork & Compliance Assessment	Conduct stakeholder interviews across HR, Finance, and other relevant departments	Weeks 4-6
	Review policies, procedures, and relevant documentation	Weeks 5-7
	Perform process walkthroughs and evaluate internal controls and procedures	Weeks 7-9
	Identify compliance gaps and associated risks	Weeks 8-9
Phase III – Analysis, Reporting & Recommendations	Analyze root causes and develop risk-ranked findings	Weeks 9-10
	Develop actionable recommendations and corrective action plan (if needed)	Submit concurrently with Draft Report
	Prepare draft report and supporting documentation	Weeks 10-11
	Hold validation meeting(s) with the Board leadership to review findings.	2 weeks prior to project closure
	Finalize report and deliver final compliance assessment	Less than 2 weeks after receiving feedback on the report
	Project Closeout	Within 15-30 days before PoP concludes

Table 2. Proposed Timeline

IV. ESTIMATED COST

The Vander Weele Group proposes a cost structure that provides the flexibility to scale services based on organizational needs and scheduling, while ensuring cost control and transparency.

Our estimated cost is based on actual hours worked by assigned personnel to complete the specific scope of the work identified. These proposed costs include all labor, overhead, administrative costs, and standard business expenses necessary to perform the assessment. We will submit in writing any proposed adjustments to rates or scope during the term of the contract will be submitted in writing and will require prior written approval from the Board through a formal change order or contract modification.

Based on the proposed scope of work and the required level of effort, our total estimated cost for the assessment is **\$59,548**.

V. KEY PERSONNEL AND QUALIFICATIONS

The Vander Wee Group will provide a structured and scalable staffing model aligned with this engagement's requirements. Our proposed team combines decades of experience supporting public institutions, including K–12 education systems, with expertise in compliance oversight, internal controls, and risk assessment. This multidisciplinary expertise directly supports the activities required for this engagement, including a compliance assessment, policy and process review, stakeholder engagement, and the development of actionable, evidence-based recommendations.

Our team will include a dedicated project manager serving as the primary point of contact, supported by financial and subject matter experts in public education and regulatory frameworks. This structure ensures we provide effective oversight, coordinate assessment activities, and consistently deliver high-quality outputs across all functional areas, including Human Resources, Finance, and other departments as needed.

Personnel assigned to this engagement have extensive experience conducting compliance assessments, monitoring reviews, and program evaluations under federal and state requirements. Our team is well-versed in education-related regulations, including frameworks relevant to K–12 systems, and is equipped to assess both policy alignment and real-world implementation. Team members are experienced in conducting stakeholder interviews, performing documentation reviews, and translating findings into clear, practical recommendations tailored to organizational context.

Table 3 outlines the roles, responsibilities, and experience of our proposed team members assigned to this engagement. We also maintain access to additional subject matter experts who can provide targeted support in areas such as education law, HR compliance, and financial management, ensuring adaptability as needs evolve.

KEY PERSONNEL	
NAME	ROLE
Dr. Kristen Mokofisi	Project Manager
<p>Responsibilities: Dr. Kristen Mokofisi will serve as Project Manager and primary point of contact for the Board. She will oversee all phases of the compliance assessment, including planning, fieldwork, analysis, and reporting. She will lead project coordination with the Board leadership, ensuring alignment on scope, priorities, and timelines. Kristen will direct the review of district policies, procedures, and practices across key functional areas, including Human Resources and Finance, and oversee stakeholder interviews, documentation review, and compliance mapping. She will ensure that all findings are evidence-based and translated into clear, actionable recommendations, and will lead the development and delivery of the final report and any corrective action plan.</p> <p>Experience: Kristen is the Director of Fiscal Oversight at the Vander Wee Group and leads complex compliance monitoring and program evaluation engagements across multiple sectors, with a strong emphasis on K–12 education monitoring programs for <i>IDEA</i>, <i>FERPA</i>, and Title IX. She previously served as State Director of the Title IV-B Grant at the Nevada Department of Education, where she oversaw the 21st Century Community Learning Centers program (\$10–\$12 million annually), supporting more than 135 sites across 12 districts and serving over 30,000 students. She also played a key role in monitoring ESSER (<i>CARES Act</i>) and ARPA funding totaling over \$1 billion, ensuring compliance, reporting accuracy, and effective program implementation. A former Title I teacher and department lead.</p> <p>At the Vander Wee Group, Kristen manages large-scale monitoring engagements, including multi-district contracts with state education agencies such as the Illinois State Board of Education. Her work includes risk</p>	

assessments, internal control evaluations, policy and process reviews, expenditure analysis, and development of corrective action recommendations. She also leads team development, technical assistance delivery, and process improvement initiatives to strengthen compliance systems. She holds a PhD in Psychology (Performance Psychology) from Grand Canyon University, a Master of Arts in Secondary Education from the University of Nevada, and multiple professional teaching certifications. She has also completed Project Management Institute (PMI) training in project management.

Richard Palmer	Senior Consultant
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Responsibilities: Richard Palmer will lead the compliance assessments and internal controls, with a focus on policies, procedures, and practices. He will evaluate alignment with federal and state requirements, assess internal controls, and review documentation to identify compliance gaps and risks. He will support risk assessment, contribute to stakeholder interviews where relevant, and develop findings and recommendations related to regulatory management, documentation, and oversight practices. He will also support quality assurance of findings and reporting.

Experience: Richard Palmer is a Certified Public Accountant (CPA) with extensive experience in auditing, internal controls, and compliance oversight across public and private sector organizations. At the Vander Weele Group, he serves as a Senior Consultant and leads complex monitoring engagements, including work with the New Jersey Department of Education to oversee *ARPA*-funded programs, where he conducted risk assessments, managed staff, coordinated with state officials, and oversaw reporting. He has also conducted detailed fiscal monitoring for large school districts, including Chicago Public Schools and multiple districts across Illinois, focusing on allowability of expenditures, internal controls, and compliance with federal grant requirements including monitoring programs for *IDEA* and *FERPA*. He regularly provides client training on internal control frameworks, including COSO and the GAO Green Book.

Prior to joining the Vander Weele Group, Mr. Palmer worked with leading firms including PwC, Deloitte, Marcum LLP, and CohnReznick, where he conducted integrated audits (financial statement and internal controls) and single audits in accordance with Generally Accepted Government Auditing Standards (GAGAS). His experience includes Sarbanes-Oxley (SOX) compliance, risk assessments, and audit planning across sectors such as education, healthcare, insurance, and nonprofit organizations. He holds a Master of Science in Accounting and Taxation from University of Hartford; and Bachelor of Science in Accounting from Eastern Connecticut State University.

Artecia Foster	Consultant
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Responsibilities: Artecia Foster will support the compliance assessment through detailed documentation review, data analysis, and validation of findings. She will assess policies, procedures, and supporting records to verify compliance and identify gaps across departments, including HR and Finance. She will analyze data to identify trends and risk indicators, and developing evidence-based findings and recommendations. Artecia will also prepare workpapers, support quality control processes, and contribute to the final report.

Experience: Artecia Foster has extensive expertise in grants monitoring, compliance review, and financial analysis across public-sector programs, including education systems. At the Vander Weele Group, she has supported major monitoring engagements for Chicago Public Schools, the Illinois State Board of Education, and other state agencies, conducting both desk reviews and site visits to assess compliance with federal and state requirements. Her work includes testing expenditures for allowability, reviewing financial and performance reports, conducting risk assessments, and providing technical assistance to improve client processes and documentation. She has also supported monitoring of *IDEA*, *FERPA*, and *CARES Act*-funded programs and contributed to oversight efforts involving education and public-sector infrastructure projects.

With a strong background in accounting and finance, including prior roles with City Colleges of Chicago, Artecia supported financial reporting, reconciliations, and preparation of annual financial reports. She has also managed internal finance and compliance functions. She holds a Bachelor of Science in Business Administration (Accounting) from Roosevelt University and an Associate of Arts in Accounting.

Table 3. Key Personnel