



North Carolina Department of Public Safety

Private Protective Services Board

Roy Cooper, Governor
Eddie M. Buffaloe, Jr., Secretary

Tamara Rabenold, Chair
Paul Sherwin, Director

December 14, 2023
Amended August 15, 2024

MEMORANDUM FOR RECORD

SUBJECT: Follow-up Registration Compliance Audit Policy

The Private Protective Services Board voted during its meeting on Thursday, December 14, 2023, to enact the following policy regarding its use of follow-up registration compliance audits:

A follow-up registration compliance audit is typically ordered as part of a Board finding that registration violations occurred previously and is intended to determine whether a company has improved its registration compliance rate (the percentage of employees who were registered as required) relative to the initial registration compliance audit.

When ordering a follow-up audit, the standard time period for the audit will start with a quarter not less than six months from the date of the Grievance Committee meeting when the originating complaint is heard. For example, if a registration violation complaint is heard by the Board in December 2023, a follow-up audit would examine registration records beginning no earlier than Q3 (July, Aug., Sept.) of 2024; or for a registration violation complaint heard in April 2024, a follow-up audit would examine registration records beginning no earlier than Q4 (Oct., Nov., Dec.) of 2024; etc.

A typical follow-up registration compliance audit will examine two quarters (six months) of employee records, though the period covered by the audit is subject to the discretion of the Board.

If the results of a follow-up registration compliance audit show a compliance rate of at least 90% [Compliance Rate = (Number of employees audited - Number of violations) ÷ Number of employees audited], and the audit findings are not disputed, the licensee may enter into a consent agreement with Board without having to appear before the Grievance Committee. Furthermore, the Grievance Committee may choose to not order an additional follow-up audit if the previous audit's compliance rate is at least 90%.

-###-