



**PORTLAND PUBLIC SCHOOLS  
OFFICE OF General Counsel**

501 North Dixon Street / Portland, OR 97227  
Telephone: (503) 916-3274

**Date:** May 18, 2021  
**To:** School Board  
**From:** Liz Large, Contracted General Counsel  
Mary Kane, Senior Legal Counsel  
**Subject:** Staff Analysis Report to the Board- 4.50.032-P Complaint Policy Revision

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**BACKGROUND**

PPS undertook a major revision of this policy in 2018 to better align with our state obligations for addressing student and family complaints. Since that time, the Complaint Coordinator has been receiving feedback from families and community members about their experiences with the complaint process. As a result of this feedback, staff identified some language in the policy that has confused our community and requested the Board Policy Committee revisit this policy to address some of these concerns and to provide greater clarity for complainants and staff in the process.

**RELATED POLICIES/BEST PRACTICES**

The District is committed to maintaining strong relationships with our families and our community. This includes having a fair, accessible process in which complaints can be addressed in a timely manner. Portland Public Schools welcomes expressions of concern as opportunities to learn, clarify our intentions, and engage in continuous improvement to benefit all students.

**ANALYSIS OF SITUATION**

Staff asked for specific revisions related to supports for complainants as the current policy doesn't articulate what is available. They recommended that the availability of translation services and assistance with completing the complaint be written into the policy and that it clarify that legal services are not available to complainants. They also asked that the reference to the Ombudsman be removed as that position had been eliminated. Staff also recommended several text revisions to simplify language used without changing the meaning.

In addition to these requested edits, the Policy Committee made a number of additional changes to provide more guidance on, for example, who could file a formal complaint with the District, the specific type of complaints that could be made against the Superintendent, and the expectation for Board member action (and notice from staff) when a complaint is pending.

The revised policy provides clearer expectations to the community and staff on what the formal complaint policy will address and how the District can support complainants through the process.

### **FISCAL IMPACT**

These changes will incur no financial impact.

### **COMMUNITY ENGAGEMENT**

In fall 2020, the Policy Committee began exploring revisions to the formal complaint policy. Although staff had been receiving input from complainants on their experience with the process since its revision in 2018, the Policy Committee requested a broader review of community experiences. In partnership with the Systems and Performance team, the Committee engaged in a first step with the community engagement process to obtain feedback and help inform the revisions.

The PPS Research and Evaluation team invited complainants who filed a formal complaint between 2014 and 2020 to complete the Formal Complaint Feedback Survey. This survey had a 27% response rate. The Committee asked for additional feedback from former complainants, but the Research and Evaluation team did not believe this would prove an effective effort to obtain additional information during pandemic conditions.

The responses to the survey varied from satisfaction that there was a process available to them to share their story and that the staff who assisted them were professional and courteous to frustration with the timeliness of the District's response and what was seen as a lack of action by the District to resolve their concerns.

### **RACIAL EQUITY AND SOCIAL JUSTICE LENS**

A review of the total number of formal complaints filed since 2014 reveals that White families access the District's formal complaint process in vastly disproportionate numbers. While some racial diversity was observed among the complainants who accessed this service during recent years, it is likely that barriers exist for historically underserved and non-White populations. Incorporating language highlighting the availability of translation/interpretation services and assistance in completing complaints is an important step toward making the process more available to a more diverse community.

### **TIMELINE FOR IMPLEMENTATION/EVALUATION and COMMUNICATION PLAN**

Many of the supports now identified in the policy have been available to complainants and so there is no additional time needed to put an implementation plan in place. Staff will develop a communication plan within the month to disseminate the policy to our community. Staff will also continue to work on internal processes and training to provide opportunities to address concerns early and to enhance the effectiveness of and experience for families with the complaint process.

### **STAFF RECOMMENDATION**

Staff recommends approval of the revised policy.

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*As a member of the PPS Executive Leadership Team, I have reviewed this staff report.*

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ATTACHMENTS

- A. 4.50.032-P Complaint Policy Draft
- B. 4.50.032-P Complaint Policy Redlined Draft