



**PORTLAND PUBLIC SCHOOLS**  
**Office of General Counsel**

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

**Date:** June 6, 2022  
**To:** School Board  
**From:** Liz Large, Contracted General Counsel  
Mary Kane, Senior Legal Counsel  
**Subject:** Staff Analysis Report to the Board- Policy Revision  
**Policy # and Name:** Complaint Policy 4.50.032-P

---

**BACKGROUND**

After receiving feedback from families and community members about their experiences with the complaint process, the Board Policy Committee made changes to the policy in the fall of 2021. These changes included clarifying language for ease of use and providing additional information on supports available to the complainant. In 2022, the Policy Committee again reviewed the policy through the lens of the community's experience with the process, in particular, the length of time necessary to receive a final decision from the Board. The Committee's proposed revisions reduce the process from three to two steps, as well as a few additional revisions to add clarity to 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**

Currently, a complainant must go through a three-step appeal process before a complaint is heard by the Board. At Step 1, the complaint is investigated by District staff who provide complainants a response within 30 days of the complaint. At Step 2, the Superintendent's (or his appointee) reviews the Step 1 finding and provides a decision on that appeal. If appealed to the Board at Step 3, the current process provides for a 90-day timeline from receipt of the complaint to final decision by the Board, unless the parties agree to an extension.

The revised policy removes the Step appeal to the Superintendent's office, allowing for a condensed timeline for resolution for families.

**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 District obtained feedback to inform the potential improvements to the Complaint process and/or policy.

The recommendation to reduce the process from three steps to two came from this engagement process.

**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 at the initial Step1 process, but the racial/ethnic distribution is not consistent at all three of the formal complaint steps. District staff continues to work on other process improvements to make complaint resolution and the formal complaint process more accessible, transparent, and approachable.

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

This policy will be implemented immediately, and pending complaints will be afforded the right to the new process. We will update the complaint webpage and our responses to received complaints to inform complainants of the amended process.

**STAFF RECOMMENDATION**

Staff recommends approval of the revised policy.

---

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

\_\_\_\_\_ (Initials)

**ATTACHMENTS**

- A. Redline copy of Complaint Policy
- B. Clean copy of Complaint Policy