

**LOS ANGELES UNIFIED SCHOOL DISTRICT
Program Evaluation and Research Branch**

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DATE: November 28, 2005

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SUBJECT: EVALUATION OF THE COMPLAINT RESPONSE UNIT / PARENT
RESOURCE NETWORK

The attached report is an evaluation of the Complaint Response Unit/Parent Resource Network. The primary purpose is to describe CRU/PRN activities and determine the unit's effectiveness in addressing parent concerns while avoiding the filing of external complaints. The evaluation is informed by the Modified Consent Decree, questions posed by the plaintiff's counsel, and an examination of the CRU/PRN database.

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**Evaluation of the Complaint Response Unit/
Parent Resource Network**

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BACKGROUND

The Complaint Response Unit (CRU) / Parent Resource Network (PRN), an office under the oversight of the Senior Deputy Superintendent of Educational Services, was established under the Modified Consent Decree (MCD) (April 21, 2003, revised) to respond to the concerns of parents of students with disabilities. The CRU/PRN is required to provide complete and accurate information to the parents who contact it, and accurately record all parent inquiries and complaints, as well as the District's responses to all parent inquiries and complaints. The ultimate purpose of the CRU/PRN is to give the District an opportunity to resolve complaints without the need for parents to resort to more formal external complaint and due process mechanisms.

The MCD provides guidelines for the operation and requirements of the CRU/PRN. Outcome 11 of the MCD requires the District to provide lawful responses to parents filing complaints within certain timelines. Section 9 discusses the requirements of the CRU/PRN, including procedures and protocols for complaint processing, data retention, staffing, record keeping and reporting, and parent notification.

The Division of Special Education issued Procedures and Protocols for the CRU/PRN (see Attachment A). This document was approved by the Independent Monitor on March 2, 2004. It includes information concerning staffing, dissemination of information, the definition of a complaint, receiving and investigating complaints, response to parents, follow-up and resolution of complaints, and retention of data.

The following document presents an evaluation study conducted by the Program Evaluation and Research Branch (PERB) at the request of the plaintiff's counsel. Its purpose is to describe the activities conducted by the CRU/PRN and determine its effectiveness in addressing parent concerns while avoiding the filing of complaints. The evaluation is informed by the requirements of the Modified Consent Decree, the questions posed by the plaintiff's counsel, and a review of existing CRU/PRN databases.

METHODOLOGY

To complete the evaluation, PERB evaluators conducted the following activities: an organizational analysis of the procedures, protocols, and operation of the CRU/PRN, an evaluation of current closed cases for information quality (completeness and accuracy)

and alignment with the requirements of the MCD; an analysis of the parent complaint data, written procedures and protocols, and interviews with CRU/PRN staff members and support unit administrators, as well as with a sample of parents who have contacted the CRU/PRN.

STAFF INTERVIEWS

Eight staff members and administrators in the CRU/PRN were interviewed in person. The interviews were open-ended and lasted from 30 to 60 minutes. All staff members including the Administrator, the Director, three Parent Community Facilitators, two Parent Coordinators, and one Specialist are full-time employees who are in contact with parents. Support Unit Administrators at all four support units were also contacted for interviews. Four administrators from three support units participated in phone interviews.

Staff members were informed of the purpose of the interviews and of the overall evaluation. The interviews were divided into the following areas: overall purpose of the CRU/PRN, descriptions of typical work days and parent concerns, action and resolution of concerns, description of procedures and protocol, training and professional development, language, data, and due process.

PARENT INTERVIEWS

The second part of this evaluation consisted of telephone interviews with a random sample of parents who had contacted the CRU/PRN with a special education concern and whose complaints had been met with a lawful response and whose cases had been closed. The purpose of these interviews was to get a better understanding of the nature of parent complaints, assess the extent to which parents believe that their complaints have been responded to, and assess whether information provided by the CRU/PRN was complete and accurate. Parents were also asked about the current status of their complaint and whether there has been any need to resort to external complaint and due process mechanisms.

A probability sample of 128 parents were selected to participate in telephone interviews to determine the quality of CRU/PRN response to complaints. This represents

approximately 10 percent of the total concerns made in the past 12 months with response times within 5, 10 and 20 days, and 100 percent of concerns in the categories of within 30 days and 30 days or higher. All concerns in these two categories were selected because these were more complex cases involving more contact with the CRU/PRN and may represent different attitudes compared to other parents. Table 1 shows the distribution of this sample in terms of number of response days.

Table 1. Sampling Approach Using Number of Response Days to Parent Complaints by the CRU/PRN: Sampling Period of March 2004 through February 2005

Response Within __ Days	N	%	Sample*
5 Days	367	42.7	37
10 Days	244	28.4	24
20 Days	201	23.4	20
30 Days	36	4.2	36
Over 30 Days	11	1.3	11
Total	859	100	128

* 100% of complaints were selected from response time categories of 30 days and Over 30 days

Concentrated efforts were made to ensure all parents had an opportunity to be interviewed. Parents were called up to five times until a contact was made and an interview completed. A sixth or seventh attempt was made in cases where additional phone numbers were made available. In cases where parents could not be contacted after five or more attempts, letters were sent to available addresses. A total of 24 letters were sent and one additional interview was completed as a result of this method.

Parents completed the interview in English or Spanish. Two of the four interviewers were bilingual English-Spanish. Two parents with home languages listed as Farsi and one parent with a home language of Thai completed the interview in English without difficulty. Overall, 47 (61.8%) of the interviews were completed in English and 29 (38.2%) were completed in Spanish. Of the 128 parents contacted, 76 (59.4%) completed their interviews, six (4.7%) refused to be interviewed, and there was no contact with 46 (35.9%) parents even after 5 or more telephone calls and a US Mail letter urging participation. Table 2 shows the distribution of interview status in the different categories of CRU/PRN response time. With one exception, interview response rates

were similar across CRU/PRN response time (between 50% and 60%). The highest response rate (79.2%) was among parents whose concerns were responded to between 6 and 10 days.

Table 2. Interview Status and Number of Response Days

Interview Status	5 days	10 days	20 days	30 days	Over 30 days	Total
Interviewed	21	19	12	18	6	76
Refused	4	0	0	2	0	6
No Contact	12	5	8	16	5	46
Total	37	24	20	36	11	128

Parent interviews took an average of 15 minutes to complete and included questions in the following areas: how parents learned of the CRU/PRN, reasons for contacting the CRU/PRN, ways in which parents tried to resolve concerns prior to contacting CRU/PRN, action taken by the CRU/PRN, call type/satisfaction, external complaints/due process, overall quality of CRU/PRN response, notification of final status, and likelihood of parent contacting CRU/PRN again.

FINDINGS

Overall Purpose of the Complaint Response Unit

According to Section 9 of the Modified Consent Decree, “the purpose of the Complaint Response Unit is to give the District the opportunity to respond parent complaints without the need for parents to resort to external complaint and due process mechanisms.” Furthermore, the Modified Consent Decree defines a complaint as “the allegation of a perceived violation of a (1) the Individuals with Disabilities Education Act and implementing regulations; (2) the California State Education Code related to special education and implementing regulations; (3) the District’s Special Education Compliance Guide.”

When asked to provide their perceptions of the overall purpose of the CRU/PRN, most staff members said that the purpose is to provide information, help, and assistance

to parents of students with disabilities. Specific staff responses provided more detail about the types of assistance provided, including: “inform parents of their rights, responsibilities, and special education options,” “assist parents of students with disabilities find resources,” “avoid having them go to outside sources,” “make sure that the district is in compliance with state laws and regulations,” and “give the district an opportunity to resolve parent complaints prior to becoming a state complaint.” One staff member shared a somewhat different view: “provide parents with clarification, to assist them in learning procedural safeguards, and to inform them of the availability of services.” One interviewee opined that the staff perceives its role as different from what it currently is due to the history of the CRU/PRN and changes in its responsibilities over the years. While no individual staff member mentioned advocacy as the primary purpose of the CRU/PRN, helping parents and children was strongly emphasized in their responses.

Both administration and staff agreed that while the CRU/PRN fulfilled a need to help to resolve parent complaints without the need for due process mechanisms or external complaints, the CRU/PRN was also responsible to “advise” parents of their due process rights. They disagreed as to the lengths to which that responsibility should be taken, as in the example of one staff member who reported assisting a parent file a state complaint.

Parent Contacts in the CRU/PRN

Parents learned about the existence of the CRU/PRN in a variety of ways. Of the 74 parents responding to this question, 20 learned of the CRU/PRN through other parents, 19 found out about it during IEP meetings or from IEP materials, 13 heard about from it school staff, and 10 from district staff. Only one parent learned of the CRU/PRN from the district’s website. No parents reported learning of the CRU/PRN solely through posters placed in schools. Two parents reported difficulty in reaching the CRU/PRN when they contacted local and central district offices. One parent believed that the CRU/PRN needs “more advertising” and that many parents simply have not heard about it.

The primary reasons parents contacted the CRU/PRN varied greatly. Concerns about IEP scheduling and diagnosis (20 parents) were the most common, followed by resource time/services (11). Other concerns included: problems with school staff (7), school placement (6), requests for general information (6), and child behavior problems (5). Most parents (59) contacted the CRU/PRN with only one primary concern, 12 parents had two different concerns, and three parents had three concerns. Table 3 shows the distribution of parent concerns among interview respondents. Although parents may have had made several calls to the CRU/PRN, they were instructed to describe their concern for one particular contact with the CRU/PRN, identified to them by date of initial contact with the CRU/PRN.

Table 3. Primary Reasons for Contacting the Complaint Response Unit

Primary Concern	N	%
IEP scheduling/diagnosis	20	27.8%
Resource time/services	11	15.3%
Problem with school staff	7	9.7%
General information	6	8.3%
School placement	6	8.3%
Behavior problems	5	6.9%
Least Restrictive Environment issues	4	5.6%
Help/assistance	3	4.2%
Graduation eligibility	2	2.8%
Speech services	2	2.8%
Transportation	2	2.8%
Bullying/violence	1	1.4%
Expulsion/suspension	1	1.4%
Retention	1	1.4%
School environment	1	1.4%
Total	72	100.0%

According to staff, the following types of concerns were the most common: student placement, availability of services, compliance with laws, the availability of speech and language therapists, and assessments. One individual noted that availability of services was a common issue and that parents call about “anything that has to do with enabling the child to access curriculum.” Three staff members reported that concerns

about a child who is out of school, due to of suspension or some other reason, are high priority.

Categorization, Procedures, and Protocols

While the PRN has been in existence and has served in the capacity of answering and reporting on parent complaints for several years, the roles and requirements of the CRU/PRN have changed since the Modified Consent Decree. While all calls to the CRU/PRN are logged into the data system, calls are categorized as either informational or as parent concerns and whether they refer to general or special education issues. Table 4 presents special education calls identified as concerns. The mean and maximum number of workdays from complaint to lawful response extracted from the PRN database from July 1, 2002 to February 28, 2005 is also presented. Because the role of the CRU/PRN has changed and the number of complaints has more than doubled since the adoption of the Modified Consent Decree (revised April 21, 2003) this evaluation focused upon services provided during the 2003-04 and 2004-05 school years.

Table 4. Number of Response Days to Parent Complaints by the CRU/PRN from 2002-03 to 2004-05: Shaded Cells Indicate Sample Period

Month	2002-03			2003-04			2004-05		
	N	Max Days	Mean Days	N	Max Days	Mean Days	N	Max Days	Mean Days
July	29	172	24	30	61	17	50	20	6
August	18	201	32	34	67	13	57	23	8
September	19	91	22	68	36	13	83	33	9
October	49	239	46	93	31	9	56	21	8
November	31	176	41	81	47	14	57	22	8
December	19	207	32	45	28	9	44	31	10
January	37	218	39	90	27	9	80	25	8
February	22	184	48	79	33	9	50	17	6
March	39	116	27	88	43	12	--	--	--
April	40	86	19	52	45	11	--	--	--
May	36	131	29	71	26	9	--	--	--
June	48	116	19	92	27	7	--	--	--
Total	387	239	31	823	67	10	477	31	8

When asked about how staff categorizes a parent call as either ‘an information request’ or ‘a concern,’ it was noted that sometimes information calls are wrongly categorized as ‘a concern.’ When this happens, the call is included in the CRU/PRN database as a concern and, after the information is provided, is considered resolved. This could serve to inflate the number of concerns and could possibly inflate the success rate for the MCD. The random sample of 128 parent concerns contained only two cases categorized as ‘concerns,’ but described as ‘information call[s]’ in the notes describing the resolution. Both of these cases were responded to within five days. The magnitude of the effect on outcome performance is expected to be small. Issues such as this should be easily resolved with additional training with staff about proper categorization of parent informational calls.

When asked about the categorization of parent concerns as special or general education, one CRU/PRN staff member reported that a student must have a special education eligibility to be considered a special education concern. Other staff indicated that if a parent has a concern surrounding an assessment that may result in the student receiving a special education eligibility, the call should be considered a special education call. Several respondents believed that, generally, the CRU/PRN staff interprets the majority of the concerns of parents as special education concerns.

All of the staff members who directly deal with parents reported using appropriate procedures when resolving parent concerns. Specifically, they said that they provided parents with a written response when a concern was met with a lawful response. In some cases, staff made additional phone contact with parents. Staff members also reported making follow-up calls after a case was closed with some parents. This is consistent with parents who, for the most part, reported in their interviews receiving written verification and, in some cases, phone verification and follow-up calls.

One staff member expressed frustration at not receiving recognition for the work accomplished by the unit, saying “We were not praised for the good work, for achieving the Outcome” by the District or the Division of Special Education. S/he added, “Our tools for helping the parents are being taken away.”

The procedures and protocols listed in Attachment A provide guidance on defining, categorizing, and responding to parent concerns. A directive issued in May

2005 provided more details instructing CRU/PRN staff to electronically forward all parent concerns to support units and allow two working days for a response. One administrator noted that the CRU/PRN sometimes does not give support units enough time to respond to parent concerns. The same administrator said that CRU/PRN staff ignores procedures and steps into an “advocacy” role inconsistent with their defined role. This belief was echoed by two support unit administrators, one of whom did not believe that district employees should advocate “against the district.”

One CRU/PRN administrator and one support unit administrator both reported that protocols were not followed in cases where parents met with staff in the CRU/PRN office. Specifically, these individuals stated that parents and staff may meet for over an hour but very little information gets entered into the database or sent to the support units. To them, this seemed to go against procedures, specifically collecting complete and accurate information, making it difficult for support unit personnel to properly respond to the concerns.

Data

Staff members reported general satisfaction with ease of use and accuracy of the data system. Information on all incoming calls is entered into a database. Data include parent and student names, school, IEP information, eligibility, and concerns. However, one staff member stated that “Overall we need to improve how information is input” and that parents be asked to clarify concerns when necessary. Staff members reported that data from each case is easy to print and have available when parents call back, whether about the same concern or a new one.

All staff members confirmed that once a case is closed, it cannot be reopened (i.e., a new case number is assigned). Also, when parents have multiple concerns about the same child, they are treated as separate concerns in the database.

Based on staff interviews and PERB’s examination of the 2004-05 database of parent concerns, a number of issues surrounding data quality arose. Complaints in the CRU/PRN database are not linked by student ID to the Student Information System (SIS) or Welligent. If a link existed, data concerning the student’s eligibility, location, grade, home language, and age would be more easily available. Such a link would expedite data

processing and lead to more accurate data reporting. Also, based on a merge of data from SIS and the CRU/PRN database, some student names in the database appear to be inaccurately transcribed. There were 13 discrepancies in names (first, last, or both) between the two sources of the 128 students in the sample. In one case, no student name was listed in the CRU/PRN database. School information was also missing or inaccurate (non-existent location codes) from 11 cases in the sample.

Another limitation to the current data system is that multiple concerns regarding the same students are not necessarily linked when calls come in on different dates and are typically assigned different student and parent identification numbers. Linking the CRU/PRN database would ensure that the same student would always have the same ID, making it easier for CRU/PRN representatives to have easier access to all of the relevant information concerning a particular child.

In some cases in the database there is an indication that a parent has elected to file a due process or state complaint. This information often appears in a “Comments” field. However, there is no definitive information in all concerns indicating whether a parent has taken a case to that level. It would be helpful to include such information in order to determine whether the CRU/PRN is successful in reducing the need for external complaints. The district’s Due Process office may have information allowing them to link cases back to the CRU/PRN database but issues concerning parent and student confidentiality may limit how much information can be shared between the two offices.

In addition to the belief that in-person meetings yield incomplete data, support unit administrators reported some dissatisfaction with the data made available to them. One person wished that CRU/PRN staff would ask more follow-up questions of parents. Specifically, this administrator wanted to have more information about initial steps parents have taken prior to bringing their complaint to the CRU/PRN. Another support unit administrator reported that data elements are sometimes missing but that generally the data are accurate.

Actions and Resolutions of Parent Concerns

Parents were asked to describe what the CRU/PRN did to respond to their concerns. According to parents, the most common action taken by the CRU/PRN was to communicate directly with the appropriate district office or staff (22 parents). Other responses include advising parents to write letters or assisting with letters (9 parents), helping parents with paperwork (8), setting up meetings between parents and schools (7), explaining legal rights and options to parents (6), and making referrals to appropriate district office or staff (6). An additional eight parents said that the CRU/PRN was unable to provide a response to the parent concern. Table 5 shows the distribution of CRU/PRN responses to parent concerns. If the CRU/PRN took more than one action, only the primary response is counted here.

Table 5. CRU/PRN Responses to Parent Concerns

CRU/PRN Action	N	%
Communication with appropriate office/staff	22	29.3%
Advised parents to write letter	9	12.0%
No action	8	10.7%
Helped with paperwork	8	10.7%
Set up meeting between parent and school	7	9.3%
Explained legal rights/options	6	8.0%
Referral to appropriate office/staff	6	8.0%
Met with parent and staff	4	5.3%
Advised parents on questions/requests	3	4.0%
Set up assessment	2	2.7%
Total	75	100.0%

In staff interviews, the issue of how the CRU/PRN should respond to parent concerns arose. Based on a directive issued in May 2005, the CRU/PRN's primary role should be to refer complaints to the local district or support unit staff. As all of the parents contacted for interviews were called regarding complaints that predated May 2005, the parent data cannot speak to current CRU/PRN response behavior. Further analysis of more recent data will better determine the degree to which CRU/PRN responses have changed. However, it can be noted that, of the 75 responses listed in Table 5, 28 were similar to what the CRU/PRN is being asked to currently do

(communication with or referral to appropriate staff/agency). An additional 12 responses (set up meeting, advised parents on questions/requests, set up assessment) could also be defined as being consistent with the current CRU/PRN role.

The staff interviews revealed that certain CRU/PRN staff believed that the unit was acting in the role of “advocate” for parents, thus encouraging the likelihood of parents filing external complaints. Of 75 parents, six reported that the CRU/PRN’s primary action was to inform them of their legal rights and options. An additional nine parents were advised to write a letter and eight were helped with paperwork; these cases could involve advocacy. These three categories of CRU/PRN responses involved 23 of the 75 parents (30.6%) contacted for interviews.

Parents were also asked whether they had received written notification, as required by the MCD. Specifically, parents were asked:

Were you contacted by the Complaint Response Unit to inform you of the final status of your complaint? Was the contact made in writing, by telephone, or in some other way?

All but two of the 76 parents reported receiving written notification. The two parents who reported not receiving written notification said that they had not received any other kind of notification.

Staff members who have worked for the CRU/PRN for several years reported that the steps they can take in response to a parent concern have changed over the past year. The written memorandum in May of 2005 advised staff not to contact schools directly, rather to make electronic contact with local district support units. This memorandum asked staff to allow two working days for the units to respond (acknowledging receipt of the parent concern and beginning the work to resolve the concern) and caused some consternation in the Unit. While this change was viewed by leadership as necessary to help build local district capacity and to resolve problems at the local level without the need for central intervention, other staff members were resistant to implementing the change and allowing local district support units to resolve the concerns.

Some CRU/PRN staff posited that this change will make it more difficult for the district to meet the timelines of Outcome 11 of the Modified Consent Decree. The outcome states, “25% of complaints will be responded to within 5 working days, 50% of complaints within 10 working days, 75% of complaints within 20 working days, and 90%

of complaints within 30 working days.” They argued that two additional days make the outcome even more difficult to achieve. Because this directive was implemented toward the end of the 2004-05 school year, its effect on Outcome 11 performance will be clearer when data from the 2005-06 school year become available.

Call Type and Satisfaction with CRU/PRN Response

CRU/PRN concerns are divided into four types: remedy, referral, information, and determined unfounded. Parents were also asked to categorize the CRU/PRN response to their concern as one of these four types. Table 6 shows the distribution of concerns into these four types. Also, parents were asked the degree to which they were satisfied with the CRU/PRN response, on a scale from 1 to 5. Table 6 shows the average rating for each of the four call types. Only four parents reported that their concern was determined to be unfounded. Parents were most satisfied with information they received (4.42, on a scale from 1 to 5) but also reported high satisfaction ratings for referral (4.19) and remedy (3.94). Parents were not satisfied (1.75) if their concern was deemed unfounded; however, there were only four cases in this category. Because parents were not selected completely randomly for the sample – 10% of parents were selected from the 5, 10, 20, and 30-day categories but 100% of parents from the over 30-day category were selected – the satisfaction ratings were weighted. The weighting reflects the over-representation of the over 30-day category (i.e., ratings from these parents receive a lower weight). The weighting is only used in reporting the satisfaction ratings in Table 6 and in the section on overall parent satisfaction. Other reported data does not reflect these weights because it is primarily descriptive. Some parents noted that the CRU/PRN did not take any action in response to their concern and were not asked to provide a rating. Most parents described the CRU/PRN response as a remedy.

Table 6. Concern Type and Satisfaction Rating

Concern Type	N	%	Weighted Rating
Remedy	40	52.6%	3.94
Information	19	25.0%	4.42
Referral	8	10.5%	4.19
None	5	6.6%	na
Unfounded	4	5.3%	1.75
Total	76	100.0%	4.27

External Complaints, Legal Actions, and Due Process

One of the stated goals of the Modified Consent Decree is to provide the opportunity to resolve parent complaints without the need for external complaint or due process mechanisms. Parents were asked whether was any need to file an external complaint or engage in any legal action or due process about their concern. Parents were reminded to only answer this question in light of the specific CRU/PRN concern about which they were being interviewed. Most parents (64, 84.2%) answered “no” to this question. One noted that the existence of the CRU/PRN was the reason she did not file an external or due process complaint. The remaining parents (12, 15.8%) did file an external or due process complaint about their concern.

When asked if the CRU/PRN was helping achieve the goal of resolving parent complaints without the need for external complaint or due process mechanisms, all staff members who work directly with parents answered yes to this question. One explained “that’s the whole purpose” of the CRU/PRN, adding that “if a school and local district can’t provide services to a parent, the parent has the right” to file an external complaint. This same individual noted that “we try to exhaust every possibility” before a parent reports to an external complaint. Another staff member explained that they do not encourage parents to file external complaints and that “no parent wants to go to due process” given the length of time involved. One staff member was concerned that the directive to refer all concerns to the support units will slow the complaint resolution process down and lead to parent frustration, which could lead to more parents filing due process complaints. In most cases, there is no documentation of whether a case goes to due process in the CRU/PRN database, so it will be difficult to determine whether this will occur more often in the future than in the past.

Support unit administrators generally believed that the CRU/PRN provided an opportunity to avoid external complaints or due process, although that they still sometimes take on the role of advocate. One person said that the CRU/PRN keep many problems from escalating. However, the same person wished that the demeanor of some CRU/PRN staff members were more professional.

Overall Quality of Complaint Response Unit

The final question parents were asked was to rate their overall quality of the Complaint Response Unit, on a scale from 1 to 5. Again, parents were asked to provide this rating solely based on the concern about which they were interviewed. Again, ratings were weighted to account for the oversampling of certain parent concerns based on the method described above.

Parents reported a high degree of satisfaction with the CRU/PRN, with the average rating being 4.19. Of the 75 parents responding to this question, 48 (64.0%) gave a rating of 5 and 11 (14.7%) parents gave a rating of 4. Seven parents (9.3%) gave a rating of 1.

Several parents reported extreme satisfaction with the CRU/PRN: “I would give it the highest score possible” and “Thank God for this kind of unit. The district should allow the CRU/PRN to go to schools to talk to parents. It shouldn’t be this adversarial [working] with the district.” One parent was happy with the fact that the CRU/PRN provided follow-up, indicating, “The representative who handled the case is still calling and checking up on the situation.” One parent noted that while satisfied with the CRU/PRN, she was still unhappy with the resolution: “The CRU/PRN was helpful. The school is unhelpful.” One unhappy parent reported that the CRU/PRN never returned her call. Another reported dissatisfaction with the CRU/PRN because her complaint was never resolved.

Parents were asked what they would do if they had another concern. Specifically, they were asked:

Based only on this interaction with the Complaint Response Unit, if you had another concern, what would you do?

The way this question was worded, if a parent indicated that they would contact the CRU/PRN, it would potentially send two messages. First, parents are satisfied enough to

contact the CRU/PRN again. Second, parents would not go through other channels (initially contacting school and local district staff) prior to contacting the CRU/PRN. Still, many parents who indicated that they would indeed call the CRU/PRN also mentioned that they would try to exhaust other options first. One parent stated that she would “First try the district, going through the steps and then go through the CRU/PRN.” This was a common response among parents. Some parents expressed great levels of frustration with school and local district staff and preferred to go straight to the CRU/PRN because of their satisfaction with the unit.

Two parents said they would bypass the school, local district, and CRU/PRN and first take legal action. One of these parents stated “I wouldn’t deal with the school. I’d go straight to an attorney and file a state complaint.” While both parents expressed overall satisfaction with the CRU/PRN, they expressed extremely high levels of frustration with the schools.

Challenges perceived by CRU/PRN staff

There are a number of challenges reported by CRU/PRN staff members relating to professional development, language difficulties, and uncertainty brought about by recent developments in the unit. Staff members reported frustration at not receiving enough training or professional development related to their work. One person reported that CRU/PRN staff receives written packets of legal information at staff meetings but little else in the way of guidance or professional development. Another individual reported a need for additional training in case management, laws, and conflict resolution. CRU/PRN administration reported that information regarding changes in laws is regularly distributed, as well as district reference guides and bulletins. This individual stated that there will be between 12 and 15 invited speakers at CRU/PRN staff meetings in the future. Both CRU/PRN administrators reported that some cases are reviewed for professional development purposes.

With respect to language, the CRU/PRN is required to handle concerns in the seven primary languages of the district. Six of the seven CRU/PRN staff in direct contact with parents are fluent in English and Spanish. Table 7 shows the distribution of CRU/PRN positions and languages spoken.

Table 7. Languages Spoken by CRU/PRN Staff Members

Title	N	N English	% English	N Spanish	% Spanish
Parent Community Facilitator	3	3	100%	3	100%
Parent Network Coordinator	2	2	100%	2	100%
Specialist	1	1	100%	0	0%
Total	6	6	100%	5	83.3%

When calls other than English or Spanish come in, a telephone translation service outside of LAUSD is used. The degree to which the CRU/PRN is able to serve parents who speak different languages is another area of disagreement between staff and administration. Staff members reported that some calls were lost because of the delay in contacting the phone service, identifying the correct language, and waiting for the translator. Staff members identified that the languages most common other home languages of were Armenian, Korean, Mandarin, and Farsi. There were few individuals in the random sample of parent concerns used in this study who speak these languages, but staff members believe that the lack of representatives speaking these languages and the lack of parental knowledge of the CRU/PRN in communities that speak these languages is a problem. Administration, on the other hand, believes that the telephone translation system is adequate. One individual indicated that staff members have been given written and recorded scripts in over 40 languages that inform parents to hold on while a translator is located.

An analysis of SIS data for students with disabilities indicated that 96.6% had home languages of English or Spanish, 1.9% (approximately 1,500 students) had home languages of Armenian, Pilipino, Farsi, Korean, or Cantonese, with the remaining 1.5% having one of over 60 other home languages. Because of the very small proportion of home languages other than English or Spanish, it would probably be impractical to hire additional staff that speaks other languages. Instead, the Division of Special Education should investigate the claims of dropped calls and work with the translation service to improve this service to ensure that the needs of parents with these other five languages are being met and that Complaint Response Unit materials are available in these languages.

Procedures and protocol represent an area of disagreement between leadership and staff. In the directive issued in May of 2005, CRU/PRN staff members were instructed in writing to electronically forward all parent concerns to local district support unit staff and to not contact schools directly. CRU/PRN administration views this document as an effort to operationalize the policies and procedures. Furthermore, it serves the purpose of building local capacity. CRU/PRN staff believe that this directive has served to limit their ability to respond to parent concerns by giving support units more control over cases. Staff members expressed concern that this impairs their own ability to take action in responding to parents. Also, although CRU/PRN administration has allowed for reduced wait times in urgent cases, staff indicate that waiting 48 hours in cases that involve students who are out of school hurts students who need to get back to school immediately. CRU/PRN administration believes that this policy helps build capacity at the school and local district level and allows parents to have their problems solved at the most local levels, and has allowed for reduced wait times for cases identified as “urgent.” Still, by adding a waiting period of up to two working days, the directive may have the unintended effect of delaying response process, thereby possibly making it more difficult to achieve the Outcome 11. This is especially true of the portion of outcome that requires 25% of concerns to be resolved within five working days.

Another procedural area that has changed recently and created tension between administration and staff is the categorization of parent complaints. In early 2005, CRU/PRN staff were given a new categorization system that was aligned with the due process categories. CRU/PRN staff expressed concern that some parent concerns (child abuse, hostile environment) are missing from the new categories and their concerns have been at least partially addressed as administration and staff cooperated in further refining and revising the categories.

There has been confusion in the CRU/PRN concerning whether new procedures needed to be approved by the Independent Monitor. The MCD states “The District shall establish procedures and protocols for the processing of complaints which shall be approved by the Independent Monitor.” Some staff members believe that these new procedures (such as the new categorization system and the written correspondence requiring all complaints to be forwarded to local district support units) must be approved

by the Monitor prior to being implemented. Others disagree. The degree of Independent Monitor oversight of the management of the CRU/PRN is an area that should be clarified by all parties to the Modified Consent Decree, including the plaintiff's counsel, the Division of Special Education, and the Office of the Independent Monitor so that necessary changes in procedures may be made according to the intent of the MCD within a reasonable timeline.

CONCLUSION

While the Modified Consent Decree clearly states the purpose of the CRU/PRN¹, staff and administration disagree on how to achieve it. CRU/PRN staff members believe that they are primarily serving parents and children by providing information and assistance. They believe that parents need to be made aware of legal and educational information specific to students with disabilities. CRU/PRN management believes that the CRU/PRN should primarily serve in a liaison or capacity building function, helping to connect parents with local district staff and resources to resolve parent concerns.

The CRU/PRN staff clearly has experience dealing with parent complaints and exhibit broad knowledge of special education issues. They express frustration about having a less direct role in complaint resolution. On the other hand, the Division of Special Education's goal of building capacity to address parent concerns at the local district and school level is also reasonable. It is likely that the CRU/PRN's administration, with its experience with and knowledge of district policies and local staff and the CRU/PRN, with its experience and understanding of parent concerns and perspectives are both essential to the CRU/PRN's purpose as defined by the Modified Consent Decree. Because the CRU/PRN has not always been under the direction of the Division of Special Education, much of the conflict we have observed may stem from different operational guidelines while under the direction of the Specially Funded and Parent/ Community Programs Division.

¹ The purpose of the Complaint Response Unit is to give the District an opportunity to resolve parent complaints without the need for parents to resort to external complaint and due process mechanisms. The Complaint Response Unit shall accurately record all parent inquiries and complaints and the District's response thereto and shall provide complete and accurate information to parents who contact it

In the 2004-05 school year, a total of 878 parent concerns regarding students with disabilities were handled by the Complaint Response Unit. In the past two years, the CRU/PRN has met Outcome 11 of the Modified Consent Decree, and results of parent interviews indicate that the quality of CRU/PRN is high. The CRU/PRN appears to serve a real need in the district for the handling of parent complaints and concerns related to students with disabilities. However, the CRU/PRN staff and leadership were not in agreement over new policies and categories for complaint response and were confused over the degree of Independent Monitor oversight regarding management decisions. It appears that when there is communication between staff and administration, it is marked by distrust and/or confusion. With an improved working relationship, and a concerted effort to develop effective policies and procedures, the CRU/PRN will certainly continue, and perhaps improve its ability to help resolve parent concerns.

Because the CRU/PRN appears to be a valuable district asset, the Division of Special Education and CRU/PRN staff should continue regular communication about new policies and procedures, and of the overall purpose of the unit. Efforts of both the Division and CRU/PRN staff should be made to communicate more effectively and compromises should be made where appropriate. This ability to work together is evidenced in the recent decision to revise the new categories to reflect recommendations by CRU/PRN staff. However, as district employees, CRU/PRN staff should be expected to adhere to the standard administrative practice of following procedures as directed. No matter the role of the CRU/PRN, appropriate training and professional development for all staff and administration should be made available. Using the results of this evaluation, the Division of Special Education should finalize the policies of the CRU/PRN and seek the approval of the Independent Monitor.