

Mr. STEIGER. You made the statement that you usually provided it. Do you always provide it or do you usually provide it?

Mrs. MARTIN. We don't always provide a copy of the complaint but the experience has been that a complainant in a northern school district will generally try to deal with the school board first, sending a copy of their complaint to the school board even before they send it to us and they sort of use us as a last resort, realizing that we don't have too much muscle in the northern school district situation.

Mr. STEIGER. I would only make the observation that I think it would be appropriate for you to always provide the board with the complaint. You may not necessarily wish to identify and I can appreciate the situation in the southern school system in which you might not want to identify the specific person involved but it would only be appropriate from your standpoint as well as the board's to have an opportunity to review the complaint.

Mr. LIBASSI. If it is not the complaint itself, it is the essence of the complaint and the allegations are fully made to the school district. We do not wander into a school district and engage in an investigation which does not disclose fully the problems which have been brought to our attention and these are made fully available to the school district.

I will see to it and make sure on Monday that that it is the case, that there is no effort on our part.

Mr. STEIGER. I think it would be well to do that.

Do you always inform the school district prior to the coming into the district for an investigation that you will be there?

Mr. LIBASSI. Yes, sir; that is done. In our southern field investigations we do not inform the school district that we are interviewing parents or children but we do inform and advise the school district that we are coming into the school district and wish to discuss the case with them.

Mr. STEIGER. Can you give me an opportunity to fill me in on why you may handle the South differently from the North in these kinds of problem areas?

Mr. LIBASSI. Most of our southern complaints come from small rural districts. There is a serious problem of safety, physical safety as well as economic reprisals which is a constant danger that the people are living under in these smaller more isolated districts.

Mr. STEIGER. Is there a legal difference between what you do in the North and in the South?

Mr. LIBASSI. There is a difference in responsibility in terms of the protection of the individual parents and children who may be raising complaints. In the South we tell—we always tell the school district exactly the nature of the complaint and we have fully disclosed the problem which has been brought to our attention and frequently we must disclose the identity of the parent if it is a problem that a parent alleges a child was improperly disciplined.

Of course we have to reveal the identity of the child to conduct the investigation. But if it is a general complaint that children are generally harassed in the corridors of the school and teachers are not taking adequate steps to prevent the harassment of the schools, we simply advise the superintendent we received this complaint, ask him