BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA

IN THE MATTER OF:

PARENTS ON BEHALF OF STUDENT,

v.

ROCKLIN UNIFIED SCHOOL DISTRICT.

OAH CASE NUMBER 2025120123

ORDER DETERMINING

DUE PROCESS COMPLAINT SUFFICIENT

DECEMBER 18, 2025

On December 1, 2025, Student filed a Due Process Hearing Request, called a complaint, with the Office of Administrative Hearings, referred to as OAH, naming Rocklin Unified School District. On December 16, 2025, Rocklin filed a Notice of Insufficiency as to the complaint. The sole basis of Rocklin's claim of insufficiency of Student's complaint is that it raises issues outside the two-year statute of limitations without an explanation or basis for the extension of the statute of limitations.

On December 17, 2025, Student filed a document entitled, Student's Withdrawal of Issue 1(a) and Issue 2 In Response to Rocklin Unified School District's Notice of Insufficiency.

APPLICABLE LAW

The named parties have the right to challenge the complaint's sufficiency. (20 U.S.C. § 1415(b) & (c).) The party filing the complaint is not entitled to a hearing unless the complaint meets the requirements of title 20 United States Code section 1415(b)(7)(A).

A complaint is sufficient if it: (1) describes the problem relating to the proposed change regarding the Student's identification, evaluation, or educational placement, or providing the Student a free appropriate public education; (2) includes facts about the problem; and (3) includes a proposed resolution to the extent known and available to the party at the time. (20 U.S.C. § 1415(b)(7)(A)(ii)(III) & (IV).) These requirements prevent vague and confusing complaints, and promote fairness by providing the named parties with sufficient information to know how to prepare for the hearing and how to participate in resolution sessions and mediation. (See H.R.Rep. No. 108-77, 1st Sess. (2003), p. 115; Sen. Rep. No. 108-185, 1st Sess. (2003), pp. 34-35.)

The complaint provides enough information when it provides "an awareness and understanding of the issues forming the basis of the complaint." (Sen. Rep. No. 108-185, *supra*, at p. 34.) The pleading requirements should be liberally construed in light of the broad remedial purposes of the IDEA and the relative informality of the due process hearings it authorizes. (*Alexandra R. ex rel. Burke v. Brookline School Dist.* (D.N.H., Sept. 10, 2009, CIV. 06-CV-0215-JL) 2009 WL 2957991[nonpub. Opn.]; *Escambia County Bd. Of Educ. V. Benton* (S.D. Ala. 2005) 406 F.Supp.2d 1248, 1259-1260; *Sammons v. Polk County School Bd.* (M.D. Fla., Oct. 28, 2005, 8:04CV2657T24EAJ) 2005 WL 2850076 [nonpub. Opn.]; but cf. *M.S.-G v. Lenape Regional High School Dist. Bd. Of Educ.* (3d Cir. 2009) 306 Fed.Appx. 772, 775 [nonpub. Opn.].) Whether the complaint is sufficient is a matter within the sound discretion of the Administrative Law Judge. (*Assistance to*

States for the Educ. Of Children with Disabilities & Preschool Grants for Children with Disabilities (Aug. 14, 2006) 71 FR 46,540-46541, 46699.)

DISCUSSION

In California, the statute of limitations is two years from the date the party initiating the request knew or had reason to know of the facts underlying the basis for the request. (Ed. Code, § 56505, subd. (l).) There are two exceptions that extend the statute of limitations. The first is when an educational rights holder was prevented from requesting a due process hearing because the local educational agency made a specific misrepresentation that a problem raised in the due process hearing request was solved. The second is when an educational rights holder was prevented from filing a due process hearing request because the local educational agency withheld information it was required to provide pursuant to the IDEA or California special education law. (Ed. Code § 56505, subd. (l)(1) or (2).)

Student's due process complaint was filed on December 1, 2025. Therefore, the two-year statute of limitations bars claims arising before December 1, 2023. Rocklin challenged the sufficiency of Student's Issue One as it raised claims during the 2023-2024 school year, including the months preceding December 1, 2023, without any proffered basis for extending the two-year statute of limitations. Rocklin contends this lack of clarity did not enable Rocklin to respond to the complaint or prepare for a resolution session, mediation, or hearing.

An independent review of Student's complaint established Student's complaint contained eight issues. Issue One and Two raised claims outside the two-year statute of limitations, as those issues included the time preceding December 1, 2023. Student did not offer any basis in his complaint for extending the two-year statute of limitations.

Those issues were insufficient as they lacked clarity as to the basis upon which Student sought to extend the statute of limitations.

Student's filing in response to Rocklin's Notice of Insufficiency established Student's withdrawal of Issue One (a) and Issue Two, and Student's concession that those issues were beyond the two-year statute of limitations. Student's response also stated, "Student maintains all other Issues in the complaint are within the two-year statute of limitations, including Issue 1 (b-i) and Issues 3, 4, 5, 6, 7, and 8."

Student's filed response to Rocklin's Notice of Insufficiency established that all of Student's issues raised claims within the two-year statute of limitations. Accordingly, Student's complaint is sufficient, and Student's issues at hearing are limited to those within the two-year statute of limitations.

ORDER

1. This Order confirms Student's withdrawal of all claims preceding the two-year statute of limitations.
2. The remaining issues in the complaint are sufficient under title 20 United States Code section 1415(b)(7)(A)(ii).

3. All mediation, prehearing conference, and hearing dates in this matter are confirmed.

IT IS SO ORDERED.

Rita Defilippis

Rita Defilippis

Administrative Law Judge

Office of Administrative Hearings