BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA

IN THE MATTER OF:

PARENTS ON BEHALF OF STUDENT,

v.

MANTECA UNIFIED SCHOOL DISTRICT.

OAH CASE NUMBER 2026010605

ORDER DETERMINING DUE PROCESS COMPLAINT SUFFICIENT

FEBRUARY 5, 2026

On January 20, 2026, Parents on behalf of Student filed a due process hearing request, called a complaint, with the Office of Administrative Hearings, naming Manteca Unified School District. February 4, 2026, Manteca Unified filed a notice of insufficiency as to Student's complaint.

MANTECA UNIFIED FILED A TIMELY NOTICE OF INSUFFICIENCY DETERMINATION

The complaint is deemed sufficient unless a party notifies OAH and the other party in writing within 15 days of receiving the complaint that the party believes the

complaint has not met the notice requirements. (20 U.S.C. § 1415(c)(2)(C); Ed. Code, § 56502, subd. (d)(1).) Manteca Unified timely filed its notice of insufficiency determination.

STUDENT'S COMPLAINT IS SUFFICIENT

Manteca Unified file a notice of insufficiency arguing that Student's complaint is vague and it is unable to prepare a defense without more specificity. Specifically, Mantica Unified maintained:

"Petitioner's Complaint indicates he is not raising claims outside the statutory time period, but then also cites to law regarding exceptions to the statute of limitations. (Complaint, fn. 1 and pp. 32-34.). It is unclear what is being pled.

•Petitioner conflates legally significant terms, such that the District is unable to determine whether the Complaint is alleging a procedural or substantive violation.

•Petitioner asserts overbroad allegations regarding multiple IEPs and extensive time periods without specifying which particular components of the Student's educational program are alleged to be inappropriate.

•Petitioner asserts issues which are not connected to a legal obligation of the District, or asserts claims that are outside the jurisdiction of OAH as pled."

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.)

Student filed a 79-page complaint with 16 issues alleging violations from 2020 through the time of filing. As to Manteca Unified's argument that the statute of limitations allegation is unclear, Student expressly alleges only those claims that fall

within the applicable statute of limitations, except where state and federal authorities permits consideration of claims beyond that period. The complaint further pleads, with specific facts and time periods, misrepresentations by Manteca Unified in paragraphs 13, 23, 37, and 58, and in some of the fact sections under specific issues. The issues section expressly addresses the statute of limitations standard and separately sets forth each issue with time frames that sufficiently demonstrates which issues Student is raising a statute of limitations extension. Student's statute of limitations allegations are sufficient.

As to Student's 16 specific issues pled, Student sets forth each issue and sub issues. Accompanied under each issue is the law and facts supporting the claims, including time frames, IEP dates if appropriate, the particular IEP components at issue and connects them to Manteca Union's legal obligations and the type of violation.

It appears as if Manteca Unified disagrees with how some of the legal analysis was presented and how some of the issues were characterized. However, Student sufficiently set forth the issues in this matter. Student satisfied the pleading requirements at this stage such that Manteca Unified can prepare for mediation, due process hearing, and a defense in this matter.

To the extent Manteca Unified argued issues are outside of OAH's jurisdiction, a sufficiency challenge is not the proper procedural mechanism to resolve jurisdictional objections. For all the reasons above:

1. The complaint is sufficient under title 20 United States Code section 1415(b)(7)(A)(ii).

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

IT IS SO ORDERED.

Cynthia Fritz

Cynthia Fritz

Administrative Law Judge

Office of Administrative Hearings