BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA

IN THE MATTER OF:

PARENTS ON BEHALF OF STUDENT,

v.

LA MESA-SPRING VALLEY SCHOOL DISTRICT.

OAH CASE NUMBER 2025100704

ORDER DETERMINING DUE PROCESS COMPLAINT SUFFICIENT

NOVEMBER 5, 2025

On October 16, 2025, Parent, on behalf of Student, filed a Due Process Hearing Request, also called a complaint, with the Office of Administrative Hearings, called OAH, naming La Mesa-Spring Valley School District as respondent. On October 31, 2025, La Mesa-Spring Valley filed a Notice of Insufficiency as to the complaint. On November 3, 2025, Student opposed the 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 party has the right to file a notice asserting a complaint is insufficient within 15 days of receiving a request for due process hearing. (20 U.S.C. § 1415 (c)(2)(C); Ed. Code § 56502, subd. ((d)(1).) 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 with 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 Individuals with Disabilities Education Act, or 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.] 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 Fed. Reg. 46541, 46699.)

DISCUSSION

Student alleges claims from January 2023 through the 2024-2025 school years for failing to assess Student. Student's areas of need are identified in the complaint. Student also claims failure to offer goals and services to meet Student's needs in the 2024-2025 and 2025-2026 school years, which are also specified in the complaint.

La Mesa-Spring Valley objects that Student has not detailed the basis on which the claims predating October 16, 2023 are pled. La Mesa-Spring Valley also contends that Student's asserted claims are vague. Minimal pleading standards apply to requests for due process pursuant to the Individuals with Disabilities Education Act. (*Schaffer ex rel. Schaffer v. Weast*, (2005) 546 U.S. 49, 54 [126 S.Ct. 528, 163 L.Ed.2d 387].)

The Individuals with Disabilities Education Act, or IDEA, allows states to establish their own statute of limitations for special education cases. (20 U.S.C. §1415(b)(6)(B) and (f)(3)(C).) 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).)

Both the IDEA and California special education law establish exceptions to the statute of limitations, in cases in which the parent was prevented from filing a request for due process, due to specific misrepresentations by the local educational agency that it had resolved the problem forming the basis of the complaint; or when parents were prevented from filing because the local educational agency's withheld information from the parent that was required to be provided. (20 U.S.C. § 1415(f)(3)(D); Ed. Code § 56505, Subd. (l).)

Student's complaint alleges facts asserting misrepresentations by La Mesa-Spring Valley staff that Student relied upon regarding Student's qualification for special

education. Student also alleges that La Mesa-Spring Valley failed to provide Parent with necessary notice of procedural safeguards after refusing Parent's request for assessment. Accordingly, Student provided notice to La Mesa-Spring Valley of the facts underlying issues alleged in the complaint, including notice of issues arising more than two-years prior to the filing of the complaint.

The facts alleged in Student's complaint are sufficient. Student's complaint identifies the issues and adequate facts about the problem to permit La Mesa-Spring Valley to respond and participate in a resolution session, mediation and hearing.

ORDER

1. The complaint is sufficient under title 20 United States Code section 1415(b)(7)(A)(ii).
2. The prehearing conference, and hearing dates in this matter are confirmed.

IT IS SO ORDERED.

Penelope Pahl

Penelope S. Pahl
Administrative Law Judge
Office of Administrative Hearings