BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA

IN THE MATTER OF:

PARENTS ON BEHALF OF STUDENT,

v.

GOLETA UNION SCHOOL DISTRICT.

OAH CASE NUMBER 2026010385

ORDER DETERMINING DUE PROCESS COMPLAINT INSUFFICIENT

JANUARY 28, 2026

On January 12, 2026, Parents on behalf of Student filed a Due Process Hearing Request, called a complaint, with the Office of Administrative Hearings, referred to as OAH, naming Goleta Union School District. On January 27, 2026, Goleta Union filed a Notice of Insufficiency as to the complaint.

APPLICABLE LAW

The named parties have the right to challenge the complaint's sufficiency. (20 U.S.C. § 1415(b) & (c).) 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).) Goleta Union timely filed the Notice of Insufficiency.

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

Goleta Union maintains that Student's complaint does not satisfy the minimum IDEA pleading requirements to sufficiently give it notice of the claims asserted; thus, it is insufficiently pled. Student pled six issues in this matter as stated below.

"The District denied [Student] a Free Appropriate Public Education by:

1. Failing to implement material components of the IEP including full-time 1:1 paraprofessional support with BCBA supervision;

2. Predetermining decisions and denying meaningful parental participation;

3. Failing to develop individualized, updated, and appropriate goals and services responsive to [Student's] current needs;

4. Failing to address health, medical, and safety needs within the IEP;

5. Permitting a hostile educational environment, including unaddressed bullying and inappropriate PE practices;

6. Improperly restricting Independent Educational Evaluations;"

All issues failed to provide Goleta Union with the required problem description and the facts related to the problem to properly notice Goleta Union of the issues in this matter.

As to Issue One, Student alleged that Goleta Union denied Student a free appropriate public education, called FAPE, by failing to implement material components

of the IEP, called individualized education program, including full-time 1:1 paraprofessional support with board certified behavior analysis supervision. Student failed to specify the other material IEP components that are not named in the issue and when Goleta Union failed to implement the 1:1 support, board certified behavior analyst supervision, and other unnamed IEP components. Issue One is vague as to time, overbroad, and fails to give Goleta Union proper notice of this issue to enable it to prepare for mediation, due process hearing, and to defend itself. Thus, Issue One is insufficiently pled.

As to Issue Two, Student alleged that Goleta Union denied Student a FAPE by predetermining decisions and denying meaningful parental participation. Student failed to describe what decisions were predetermined, when this occurred, and what IEPs are at issue. Further, is it unclear how parental participation was impeded, when this happened, and during what IEP team meetings. Student failed to provide sufficient factual information in connection with this issue. As written, Issue Two is vague as to time, overbroad, unclear, and insufficiently pled. It does not give Goleta Union an awareness and understanding of the issues forming the basis of the complaint.

As to Issue Three, Student alleged that Goleta Union denied Student a FAPE by failing to develop individualized, updated, and appropriate goals and services responsive to Student's current needs. Student makes no reference to any named goals or services in the complaint. Student failed to identify what goals and services were not appropriate or not offered at all. Student failed to specify when these allegations took place. Student failed to connect any facts to this issue. As pled, Student Issue Three is vague, overbroad, unclear, and fails to put Goleta Union on notice to defend itself and prepare for hearing. For all of these reasons, Student's Issue Three is insufficiently pled.

As to Issue Four, Student alleged that Goleta Union denied Student a FAPE by failing to address health, medical, and safety needs within the IEP. Student failed to specify the time at issue. Student failed to specify what IEP Student is referring to in the issue statement. Further, Student did not describe in any way what "addressed' means in relation to Student's health, medical, and safety issues, such as through goals, services, accommodations, supports, placement or something else. Student does not link any of its health or medical facts in the complaint to this issue or any FAPE violation. Student gives little to no facts related to safety issues and failed to connect any facts to this issue or any FAPE violation. Goleta Union is left to guess as to the nature of the multiple allegations asserted within this issue. Student's Issue Three is vague, overbroad, and unclear, and failed to give Goleta Union the proper notice to prepare for mediation, hearing, or a defense. Thus, Issue Three is insufficiently pled.

As to Issue Five, Student alleged that Goleta Union permitted a hostile educational environment, including unaddressed bullying and inappropriate PE practices, Student failed to specify the time at issue or specific facts for both the unaddressed bullying and inappropriate physical education practices. The complaint is lacking in the basic facts regarding this issue to allow Goleta Union the ability to discern the nature of the claims within Issue Five. Student failed to specify a time period regarding the unaddressed bullying and inappropriate physical education practices. Student also failed to link any facts to this issue. Student failed to connect these allegations to any FAPE denial to understand if this issue is within OAH's jurisdiction. For these reasons, Student's Issue Five is vague, overbroad, unclear, and insufficiently pled.

As to Issue Six, Student alleged that Goleta Union improperly restricting independent educational evaluations. Student failed to failed specify the independent

education evaluations at issue and the time at issue. Student failed to connect any facts to this issue. Student failed to set forth facts about how this impeded Parents' rights and denied Student a FAPE. Student's Issue Six is vague, overbroad, and fails to inform Goleta Union of the nature of the problem being alleged against it. Thus, Issue Six is insufficiently pled.

ORDER

1. Student's complaint is insufficiently pled under section title 20 United States Code 1415(c)(2)(D).
2. Student will be permitted to file an amended complaint under title 20 United States Code section 1415(c)(2)(E)(i)(II).
3. The amended complaint must comply with the requirements of title 20 U.S.C. section 1415(b)(7)(A)(ii), and must be filed not later than 14 days from the date of this order.
4. If Student fails to file a timely amended complaint, the complaint will be dismissed.
5. All dates previously set in this matter are vacated.

IT IS SO ORDERED.

Cynthia Fritz

Cynthia Fritz
Administrative Law Judge
Office of Administrative Hearings