BEFORE THE
OFFICE OF ADMINISTRATIVE HEARINGS
STATE OF CALIFORNIA

IN THE MATTER OF:

PARENTS ON BEHALF OF STUDENT,

v.

OAKLAND UNIFIED SCHOOL DISTRICT.

OAH CASE NUMBER 2025090500

ORDER DETERMINING DUE PROCESS COMPLAINT SUFFICIENT

DECEMBER 15, 2025

The Office of Administrative Hearings, or OAH, granted amendment of Student's Complaint on November 25, 2025. On December 10, 2025, Oakland Unified School District filed a Notice of Insufficiency as to the complaint. On December 12, 2025, Student filed a Response to 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

Oakland challenges the sufficiency of the amended complaint on the basis that the amended complaint does not specify dates for all but two of the alleged violations. As an example of this, Oakland points to Student's amended issue 1(a)(i) that asks whether Oakland denied Student a FAPE by failing to ensure Student's engagement with learning and peers. Oakland argues this issue is insufficient because it fails to specify a time period for this violation. This argument is unpersuasive. For two of Student's sub issues, Student limited the allegation time frame to something less than the statutory time period. For all other allegations of which Student did not limit time frame, the entire statutory period applies. Student further confirmed this intention in Student's Response to Notice of Insufficiency.

Oakland also argues that the amended complaint is unclear as to which facts in the factual summary section apply to which sub issues, and, as a result, Oakland is unable to adequately respond to the complaint or prepare for and participate in hearing. This too is unpersuasive. Each of Student's amended sub issues describes a problem to be litigated under the IDEA, and meets the pleading threshold of the IDEA. Further, the amended complaint includes a factual summary on which the entirety of the complaint is based. Oakland has not provided legal authority to support a heightened requirement that a complaint must detail which facts apply to which sub issues.

The amended complaint identifies the issues and adequate facts about the problem to permit Oakland to respond and participate in a resolution session and mediation. Student's complaint is sufficient.

ORDER

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.

Claire Yazigi

Claire Yazigi
Administrative Law Judge
Office of Administrative Hearings