

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Uhlenkamp v. District of Columbia

Uhlenkamp v. District of Columbia · No. 1:21-cv-2662 (TNM) · Decided June 9, 2026

SUMMARY

The U.S. District Court for the District of Columbia reviewed objections to a magistrate judge’s Report and Recommendation in an Individuals with Disabilities Education Act dispute involving the adequacy of a student’s December 2019 individualized education program. The court overruled the parents’ objections, adopted the Report in full, and held that the December IEP was reasonably calculated to enable the student to make progress. The court therefore denied the parents’ tuition reimbursement claim and granted in part and denied in part both parties’ summary judgment motions.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Trevor N. McFadden
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 9, 2026
DOCKET	1:21-cv-2662 (TNM)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs and the District filed cross-motions for summary judgment seeking review of a hearing officer's administrative determination under the Individuals with Disabilities Education Act. Plaintiffs objected to a magistrate judge's Report and Recommendation concerning the adequacy of A.U.'s December 2019 individualized education program and related tuition reimbursement.
STANDARD OF REVIEW	In IDEA cases presented through cross-motions for summary judgment without additional evidence, the motions function as a procedural vehicle for review of the administrative record. The court gives due weight and some deference to the hearing officer and school officials, particularly to credibility determinations based on live testimony, but gives little deference to hearing decisions lacking reasoned and specific findings. Proper objections to a magistrate judge's recommendation are reviewed de novo under Federal Rule of Civil Procedure 72(b)(3).

PRECEDENTIAL VALUE	Published district court opinion; persuasive authority within the District of Columbia but not binding precedent outside the court's jurisdiction.
PARTIES	Bowen Uhlenkamp and Sadaf Lakhani, parents of the minor child A.U. v. District of Columbia

TOPICS

judicial review of agency action

summary judgment

exhaustion of remedies

administrative law

civil procedure

PRACTICE AREAS

special education

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the December 2019 IEP was reasonably calculated to enable A.U. to make progress in light of his individual circumstances and therefore satisfied the IDEA's FAPE requirement.
2. Whether the hearing officer adequately addressed the issues identified in the district court's remand instructions and made sufficiently reasoned findings.
3. Whether Plaintiffs were entitled to tuition reimbursement for A.U.'s enrollment at Siena based on the alleged inadequacy of the December 2019 IEP.
4. What standard governs district-court review of an IDEA administrative determination and objections to a magistrate judge's Report and Recommendation.

HOLDINGS

1. The December 2019 IEP was reasonably calculated to enable A.U. to make progress in light of his individual circumstances and satisfied the IDEA's requirements.
2. Cross-motions for summary judgment in this IDEA setting are treated as requests for review of the administrative determination, with due weight and some deference given to the hearing officer's findings, especially credibility determinations, while decisions lacking reasoned and specific findings receive little deference.
3. Plaintiffs were not entitled to tuition reimbursement for A.U.'s enrollment at Siena because that claim depended on finding the December 2019 IEP inadequate, and the court found the IEP adequate.
4. The court overruled Plaintiffs' objections and adopted the magistrate judge's Report and Recommendation in full.

KEY QUOTATIONS

"Although styled as motions for summary judgment, the Court treats the cross-motions before it as seeking review of Hearing Officer Banks' administrative determination." (at 3)

“IDEA’s mandate “requires an educational program,”—here the December IEP— “reasonably calculated to enable a child to make progress in light of the child’s circumstances.”” (at 5)

“Because DCPS provided A.U. with an adequate December IEP, the claim fails.” (at 15)

FACTUAL BACKGROUND

A.U. had learning disabilities, and his parents alleged that DCPS failed to develop an IEP adequately addressing those disabilities and failed to provide him a free appropriate public education. The parents moved A.U. to the private Siena school and sought tuition reimbursement and other education-related relief. The dispute on this appeal centered on the December 2019 IEP, including its specialized instruction, goals, occupational-therapy services, placement, accommodations, reading program, and supports for math and English.

PROCEDURAL HISTORY

Plaintiffs challenged DCPS's alleged failure to provide A.U. a free appropriate public education, first pursuing administrative relief before Hearing Officer Terry Michael Banks, who denied their claims. The district court previously remanded the matter for reconsideration of three IEPs and tuition reimbursement. On remand, the hearing officer again rejected the challenges and denied reimbursement. Magistrate Judge Matthew J. Sharbaugh recommended granting and denying both parties' summary-judgment motions in part. The district court overruled Plaintiffs' objections, adopted the Report and Recommendation in full, and granted in part and denied in part both motions.

DISPOSITION

other

CASES CITED

- Uhlenkamp v. District of Columbia, 691 F. Supp. 3d 224 (D.D.C. 2023)
- Massey v. District of Columbia, 400 F. Supp. 2d 66, 70 (D.D.C. 2005)
- S.B. v. District of Columbia, 783 F. Supp. 2d 44, 50 (D.D.C. 2011)
- M.G. v. District of Columbia, 246 F. Supp. 3d 1, 8 (D.D.C. 2017)
- Gill v. District of Columbia, 751 F. Supp. 2d 104, 109 (D.D.C. 2010)
- Roark ex rel. Roark v. District of Columbia, 460 F. Supp. 2d 32, 38 (D.D.C. 2006)
- McAllister v. District of Columbia, 45 F. Supp. 3d 72, 76 (D.D.C. 2014)
- Kerkam v. Superintendent of D.C. Pub. Schs., 931 F.2d 84, 87 (D.C. Cir. 1991)
- Edward M.R. v. District of Columbia, 660 F. Supp. 3d 82, 97 (D.D.C. 2023), *aff’d*, 128 F.4th 290 (D.C. Cir. 2025)
- Jones v. Kirchner, 835 F.3d 74, 83 (D.C. Cir. 2016)
- A.I. ex rel. Iapalucci v. District of Columbia, 402 F. Supp. 2d 152, 161, 170 (D.D.C. 2005)
- Block v. District of Columbia, 748 F. Supp. 891, 896 (D.D.C. 1990)
- Garriss v. District of Columbia, 210 F. Supp. 3d 187, 190 (D.D.C. 2016)

- Goodman v. Colvin, 233 F. Supp. 3d 88, 109 (D.D.C. 2017)
- L.R.L. ex rel. Lomax v. District of Columbia, 896 F. Supp. 2d 69, 74 (D.D.C. 2012)
- Sciacca v. FBI, 23 F. Supp. 3d 17, 27 (D.D.C. 2014)
- Endrew F. v. Douglas Cnty. Sch. Dist., 580 U.S. 386, 403 (2017)
- Jones v. District of Columbia, No. 17-1437, 2018 WL 7286022, at *13 (D.D.C. Sept. 5, 2018)
- Q.K. v. Smith, No. 21-0283, 2022 WL 912720, at *13 (D. Md. Mar. 29, 2022)
- A.K. ex rel. J.K. v. Alexandria City Sch. Bd., 484 F.3d 672, 682 (4th Cir. 2007)
- Z.B. v. District of Columbia, 888 F.3d 515, 526 (D.C. Cir. 2018)
- A.W. v. District of Columbia, No. 12-411, 2014 WL 12884524, at *5 (D.D.C. Sept. 19, 2014)

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