

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Eley v. District of Columbia

Civil Action No. 25-3628 (SLS) (D.D.C. June 29, 2026) · No. Civil Action No. 25-3628 (SLS) · Decided June 29, 2026

SUMMARY

The United States District Court for the District of Columbia reviews a hearing officer’s decision concerning Shanda Eley’s claim for compensatory education under the Individuals with Disabilities Education Act. Although the court recognizes that DCPS denied Shanda a free appropriate public education by failing to address her attendance issues in her individualized education programs, it holds that the hearing officer reasonably found no educational harm warranting compensatory education. The court denies the plaintiffs’ motion for summary judgment and grants the District’s cross-motion.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Sparkle L. Sooknanan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 29, 2026
DOCKET	Civil Action No. 25-3628 (SLS)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs sought review under the Individuals with Disabilities Education Act of a hearing officer's decision denying compensatory education after finding that DCPS had denied Shanda Eley a free appropriate public education. The parties cross-moved for summary judgment on the administrative record.
STANDARD OF REVIEW	The court reviewed the administrative record under the IDEA through the procedural vehicle of summary judgment. The party challenging the administrative determination bears the burden of persuading the court by a preponderance of the evidence that the hearing officer was wrong. Administrative factual findings are prima facie correct and receive due weight, although a decision lacking reasoned and specific findings receives little deference.
PRECEDENTIAL VALUE	published district court memorandum opinion
PARTIES	Shalonda Eley, Shanda Eley v. District of Columbia

TOPICS

remedies

judicial review of agency action

summary judgment

administrative law

civil procedure

PRACTICE AREAS

special education

administrative law

civil procedure

education law

QUESTIONS PRESENTED

1. Whether the hearing officer erred in declining to award compensatory education after finding that DCPS denied Shanda a FAPE by failing to address her attendance problems in her 2024 IEPs.
2. Whether the hearing officer's factual findings and conclusion that the FAPE denial caused no compensable educational harm were sufficiently reasoned and supported by the administrative record.

HOLDINGS

1. A denial of a FAPE does not automatically require an award of compensatory education; the remedy is appropriate when necessary to remedy educational harm caused by the denial. Because the hearing officer reasonably found no educational harm requiring correction, the decision denying compensatory education was affirmed.
2. The court must give due weight to a hearing officer's reasoned and specific factual findings and may not substitute its own view of educational policy absent a persuasive basis in the record to reject those findings.

KEY QUOTATIONS

“The purpose of a compensatory education award, when one is warranted, is to put a student in the position that they would have been in “absent the FAPE denial.”” (Discussion)

“Notably, however, “an award of compensatory education is not mandatory in cases where a denial of a FAPE is established.”” (Discussion)

“Thus, the proper question in most cases is not merely whether a student has been denied a FAPE, but rather, whether the denial of a FAPE has caused educational harm.” (Discussion)

“For the reasons above, the Court denies the Eleys’ Motion for Summary Judgment, ECF No. 7, and grants the District’s Cross-Motion for Summary Judgment, ECF No. 9.” (Conclusion)

FACTUAL BACKGROUND

Shanda Eley, a twenty-one-year-old student with autism, received special education services from DCPS. During the 2023-2024 school year, she developed significant attendance problems, and DCPS amended her IEPs without providing accommodations or supports specifically addressing those problems. Her attendance later improved, she transferred to a workforce development program in November 2024, and she was reported to be thriving there. The hearing officer found that DCPS had denied FAPE but concluded that the record did not establish educational harm requiring compensatory education.

PROCEDURAL HISTORY

On May 5, 2025, Shalonda Eley filed an administrative complaint concerning DCPS's failure to address Shanda's attendance problems in her 2023-2024 and 2024-2025 IEPs. After a July 2025 administrative hearing, the hearing officer found a denial of FAPE but declined to award compensatory education because the attendance problems had resolved and the record did not establish compensable educational harm. Plaintiffs filed this action on October 10, 2025, seeking reversal or remand. The district court denied plaintiffs' motion for summary judgment and granted the District's cross-motion.

DISPOSITION

other

CASES CITED

- Boose v. D.C., 786 F.3d 1054, 1056, 1057, 1059 (D.C. Cir. 2015)
- Lesesne ex rel. B.F. v. D.C., 447 F.3d 828, 830 (D.C. Cir. 2006)
- Honig v. Doe, 484 U.S. 305, 311 (1988)
- Lopez-Young v. D.C., 211 F. Supp. 3d 42, 46, 51 (D.D.C. 2016)
- Reid ex rel. Reid v. D.C., 401 F.3d 516, 521-22, 524, 527 (D.C. Cir. 2005)
- D.R. ex rel. Robinson v. D.C., 637 F. Supp. 2d 11, 16 (D.D.C. 2009)
- Q.C-C. v. D.C., 164 F. Supp. 3d 35, 44 (D.D.C. 2016)
- Holman v. D.C., 153 F. Supp. 3d 386, 392-94 (D.D.C. 2016)
- Bd. of Educ. of Hendrick Hudson Cent. Sch. Dist., Westchester Cnty. v. Rowley, 458 U.S. 176, 206 (1982)
- B.D. v. D.C., 817 F.3d 792, 797-98 (D.C. Cir. 2016)
- Phillips ex rel. T.P. v. D.C., 932 F. Supp. 2d 42, 50 & n.4 (D.D.C. 2013)
- Wade v. D.C., No. 20-cv-1433, 2021 WL 11585179, at *10 (D.D.C. Feb. 19, 2021), report and recommendation adopted, 2021 WL 3663630 (D.D.C. Aug. 18, 2021)
- Z. B. v. D.C., 888 F.3d 515, 519 (D.C. Cir. 2018)
- Savoy v. D.C., 844 F. Supp. 2d 23, 30 (D.D.C. 2012)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 247 (1986)