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## No Special Hurdles U.S. Supreme Court Rejects Higher Burden for Students in Disability Discrimination Claims

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On June 12, 2025, the United States Supreme Court issued a decision in *A.J.T. by and through A.T. v. Osseo Area Schools, Independent School District No. 279* (U.S., June 12, 2025, No. 24-249) 605 U.S. \_\_\_, holding that students bringing disability discrimination claims under the Americans with Disabilities Act (ADA) and the Rehabilitation Act of 1973 cannot be held to a higher legal standard solely because their claims arise in an educational context. Specifically, the Court held students are not required to show that a denial of educational accommodations was the result of “bad faith or gross misjudgment.” While all nine Justices joined in the opinion, Justices Thomas and Sotomayor wrote separately indicating they would have decided additional arguments raised by Osseo Area Schools.

### Background

A.J.T. is a teenage student with a rare and severe form of epilepsy. Her seizures are more prevalent in the morning hours and prevent her from attending school before noon. A.J.T.’s former school district accommodated her condition by allowing her to start her school day in the afternoon and by providing evening instruction. However, when A.J.T. moved, her new school district, Osseo Area Schools, denied her requests for similar accommodations. As a result, A.J.T. received only 4.25 hours of instruction per day, compared to 6.5 hours received by nondisabled students in the same district.

A.J.T. initially filed an administrative complaint alleging that Osseo Area Schools’s refusal to provide accommodations denied her a free appropriate public education as required by the Individuals with Disabilities Education Act (IDEA). The Administrative Law Judge ruled in A.J.T.’s favor and ordered Osseo Area Schools to provide hundreds of hours of compensatory education and include after-hours at-home instruction in A.J.T.’s individualized education program (IEP).

Following two appeals both affirming the Administrative Law Judge’s ruling, A.J.T. separately sued Osseo Area Schools seeking damages under Title II of the ADA and Section 504 of the Rehabilitation Act of 1973. Although the trial court found that A.J.T. qualified for relief under both statutes, the court granted summary judgment for Osseo Area Schools on the basis that A.J.T. was unable

to show that school officials acted with bad faith or gross misjudgment in denying her accommodations requests. This “bad faith or gross misjudgment” standard was based on Eighth Circuit precedent that imposed a heightened standard in education-related disability discrimination cases.

The Supreme Court took A.J.T.’s case to resolve the issue of whether a higher standard can be imposed on students than is imposed on other plaintiffs bringing the same claims outside of the educational context.

## **The Supreme Court Unanimously Levels the Playing Field for Students**

In an opinion authored by Chief Justice John Roberts and joined by all nine Justices, the Supreme Court ruled that students cannot be subjected to a higher burden than other plaintiffs when pursuing claims under the ADA or the Rehabilitation Act of 1973.

The text of the ADA and the Rehabilitation Act of 1973 played a key role in the Court’s decision. The Court noted that both the ADA and the Rehabilitation Act of 1973 provide remedies for “any person,” and do not include any textual basis that the application of such remedies applies differently depending on the nature of an individual’s claim.

Discussing the origins of the Eighth Circuit’s standard, the Court noted the standard arose under an earlier version of the IDEA which was interpreted to be the exclusive avenue for students to challenge the adequacy of their education. However, Congress later amended the IDEA, specifically providing that it does not limit the remedies available under the ADA or the Rehabilitation Act of 1973.

Ultimately, the Court found that students are not required to meet a higher standard to prevail under the ADA or the Rehabilitation Act of 1973, as compared to plaintiffs outside of the educational context.

## **Impact on California School Districts**

This decision should not significantly affect California school districts. The standard at issue was unique to the Eighth Circuit. By contrast, the Ninth Circuit, encompassing all of California, already applies the “deliberate indifference” standard to claims under the ADA and the Rehabilitation Act, a standard that remains unchanged following the Court’s decision in *A.J.T.*

## **Takeaways**

While the Supreme Court clarified the standard students must meet to prevail in claims under the ADA and the Rehabilitation Act of 1973, the decision applies only to the Eighth Circuit’s previously heightened standard for student claims. Since California schools already apply the “deliberate indifference” standard, the decision aligns with existing Ninth Circuit precedent and will not increase local liability.

If you have any questions about *A.J.T. v. Osseo Area Schools* or need guidance related to discrimination claims under the IDEA, ADA, or Rehabilitation Act of 1973, please contact the author of this Client News Brief or an attorney at one of our [eight offices](#) located statewide. You can also subscribe to our [podcast](#), follow us on [Facebook](#), and [LinkedIn](#) or download our [mobile app](#).

# Client News Brief

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