

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Scotty H. v. Frank Bisignano

Scotty H. v. Bisignano, No. 4:24-cv-01083 PLC (E.D. Mo. Apr. 24, 2026) · No. No. 4:24-cv-01083 PLC ·
Decided April 24, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri reviews the denial of Scotty H.’s applications for Disability Insurance Benefits and Supplemental Security Income. The court reverses the Commissioner’s decision and remands for further proceedings, addressing the administrative law judge’s failure to fully develop the record concerning the plaintiff’s treating psychiatrist and the support for the residual functional capacity finding.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Patricia L. Cohen
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	April 24, 2026
DOCKET	No. 4:24-cv-01083 PLC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner of Social Security's final decision denying Disability Insurance Benefits and Supplemental Security Income. The Commissioner defended the administrative law judge's decision, and Plaintiff sought reversal and remand.
STANDARD OF REVIEW	The court must affirm the Commissioner's decision if it complies with applicable legal requirements and is supported by substantial evidence in the record as a whole. The court considers evidence supporting and detracting from the decision, but may not reweigh the evidence or reverse merely because substantial evidence supports a contrary outcome.
PRECEDENTIAL VALUE	unpublished

PARTIES

Scotty H. v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action

administrative law

exhaustion of remedies

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ fulfilled the independent duty to fully and fairly develop the administrative record when the record plainly lacked years of treatment notes from the claimant's identified treating psychiatrist.
2. Whether the Commissioner's decision should be reversed and remanded because the undeveloped record prevented a reliable assessment of the claimant's mental limitations and residual functional capacity.

HOLDINGS

1. The ALJ failed to fulfill the independent duty to fully and fairly develop the record because the record plainly lacked approximately five years of treatment notes from Plaintiff's identified treating psychiatrist, and the ALJ could not reasonably rely on counsel's inaccurate representation that the submitted records were complete.
2. Reversal and remand under sentence four of 42 U.S.C. § 405(g) was warranted because the missing psychiatric treatment records left a crucial issue undeveloped and prevented a reliable determination of the effect of Plaintiff's impairment on his ability to work.

KEY QUOTATIONS

"Here, the absence of the missing treatment notes left a crucial issue undeveloped and the record did not contain enough evidence for the ALJ to determine the impact of Plaintiffs impairment on his ability to work."
(Discussion, Part V.B)

"While a claimant has the responsibility of providing medical evidence, the administrative process is not adversarial and the ALJ has an independent duty to fully and fairly develop the record." (Discussion, Part V.B)

FACTUAL BACKGROUND

Scotty H. alleged disability based on physical conditions and longstanding mental-health conditions, including depression, anxiety, paranoia, anger, and difficulty interacting with others. He identified Dr. Narsimha R. Muddasani as his treating psychiatrist and testified that he had received ongoing psychiatric treatment for more than five years following a 2017 suicide attempt. Although the ALJ recognized that psychiatric treatment records after 2017 were missing and left the record open for additional submissions, the records submitted consisted

primarily of physical-treatment records and did not include Dr. Muddasani's succeeding treatment notes. The ALJ nevertheless found only moderate mental limitations, assessed an RFC for restricted light work, and found Plaintiff not disabled.

PROCEDURAL HISTORY

Plaintiff filed applications for DIB and SSI in April 2018. After the SSA denied the applications initially, an ALJ held a hearing on September 6, 2022, and issued a decision on June 13, 2023, finding Plaintiff not disabled. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court reversed and remanded under sentence four of 42 U.S.C. § 405(g) because the ALJ failed to adequately develop the record concerning treatment records from Plaintiff's treating psychiatrist.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings consistent with the memorandum and order, including more fully developing the record concerning Plaintiff's psychiatric treatment with Dr. Muddasani and reevaluating the RFC in light of any additional medical evidence and the existing record.

CASES CITED

- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Page v. Astrue, 484 F.3d 1040, 1043 (8th Cir. 2007)
- Caviness v. Massanari, 250 F.3d 603, 605 (8th Cir. 2001)
- Moore v. Astrue, 572 F.3d 520, 523 (8th Cir. 2009)
- Lacroix v. Barnhart, 465 F.3d 881, 887 (8th Cir. 2006)
- McCoy v. Astrue, 648 F.3d 605, 611-12 (8th Cir. 2011)
- Brock v. Astrue, 674 F.3d 1062, 1064 (8th Cir. 2012)
- Cuthrell v. Astrue, 702 F.3d 1114, 1117-18 (8th Cir. 2013)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Pate-Fires v. Astrue, 564 F.3d 935, 942 (8th Cir. 2009)
- Chesser v. Berryhill, 858 F.3d 1161, 1164 (8th Cir. 2017)
- Prosch v. Apfel, 201 F.3d 1010, 1012 (8th Cir. 2000)
- Renstrom v. Astrue, 680 F.3d 1057, 1064 (8th Cir. 2012)
- Gonzales v. Barnhart, 465 F.3d 890, 894 (8th Cir. 2006)
- Wright v. Colvin, 789 F.3d 847, 852 (8th Cir. 2015)
- Perkins v. Astrue, 648 F.3d 892, 897 (8th Cir. 2011)
- Battles v. Shalala, 36 F.3d 43, 44-45 (8th Cir. 1994)
- Kamann v. Colvin, 721 F.3d 945, 950 (8th Cir. 2013)

- Naber v. Shalala, 22 F.3d 186, 189 (8th Cir. 1994)
- Twyford v. Commissioner, Social Security Administration, 929 F.3d 512, 517 n.3 (8th Cir. 2019)
- Shannon v. Chater, 54 F.3d 484, 488 (8th Cir. 1995)
- Harris v. O'Malley, No. 4:23-cv-00287-AGF, 2024 WL 1989017, at *4 (E.D. Mo. May 6, 2024)
- Cox v. Apfel, 160 F.3d 1203, 1209 (8th Cir. 1998)

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