

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
IOWA, CENTRAL DIVISION

DANIEL H. v. FRANK BISIGNANO, Commissioner of Social
Security

Daniel H. · No. C24-3047-LTS-MAR · Decided March 31, 2026

SUMMARY

The United States District Court for the Northern District of Iowa reviewed a magistrate judge’s report and recommendation in a Social Security disability benefits action. Finding no clear error and substantial evidence supporting the Commissioner’s decision, the court adopted the recommendation, affirmed the denial of benefits, and entered judgment for the Commissioner.

CASE DETAILS

COURT	United States District Court for the Northern District of Iowa, Central Division
WRITING FOR THE COURT	Leonard T. Strand
JURISDICTION	United States District Court for the Northern District of Iowa, Central Division
DECIDED	March 31, 2026
DOCKET	C24-3047-LTS-MAR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Review of a magistrate judge's Report and Recommendation recommending affirmance of the Commissioner's denial of disability insurance benefits. Neither party objected to the R&R.
STANDARD OF REVIEW	The Commissioner's factual findings must be affirmed if supported by substantial evidence on the record as a whole. The court may not reweigh the evidence or review the factual record de novo. Because neither party objected to the magistrate judge's Report and Recommendation, the district court reviewed it for clear error.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation or stated precedential designation.
PARTIES	Daniel H. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

Administrative Law

Federal Civil Procedure

QUESTIONS PRESENTED

1. Whether the magistrate judge's Report and Recommendation contained clear error when it concluded that the administrative law judge adequately considered the claimant's need for a hand-held assistive device, medical history, treatment, and subjective allegations.
2. Whether the Commissioner's determination that Daniel H. was not disabled was supported by substantial evidence on the record as a whole.

HOLDINGS

1. When neither party objects to a magistrate judge's Report and Recommendation, the district court may review the recommendation for clear error; the court did so here and found no clear error.
2. The Commissioner's determination that Daniel H. was not disabled is affirmed because it was supported by substantial evidence and the magistrate judge's recommendation disclosed no clear error.

KEY QUOTATIONS

“The Commissioner’s decision must be affirmed “if it is supported by substantial evidence on the record as a whole.””

“The court, however, does not “reweigh the evidence presented to the ALJ,””

“The Commissioner’s determination that the Claimant was not disabled is affirmed.”

FACTUAL BACKGROUND

Daniel H. sought disability insurance benefits under Title II of the Social Security Act. The Commissioner determined that he was not disabled. The R&R addressed whether the administrative law judge adequately considered Daniel H.'s need for a hand-held assistive device, medical history, treatment, and subjective allegations, and concluded that the denial was supported by substantial evidence.

PROCEDURAL HISTORY

The Commissioner denied Daniel H.'s application for Title II disability insurance benefits. Magistrate Judge Mark A. Roberts recommended affirming the denial. After the parties failed to object, the district judge reviewed the R&R for clear error, adopted it without modification, affirmed the Commissioner's determination, and directed entry of judgment for the Commissioner.

DISPOSITION

affirmed

CASES CITED

- Pelkey v. Barnhart, 433 F.3d 575, 577 (8th Cir. 2006)
- Lewis v. Barnhart, 353 F.3d 642, 645 (8th Cir. 2003)
- Culbertson v. Shalala, 30 F.3d 934, 939 (8th Cir. 1994)
- Vester v. Barnhart, 416 F.3d 886, 889 (8th Cir. 2005)
- Kluesner v. Astrue, 607 F.3d 533, 536 (8th Cir. 2010)
- Baldwin v. Barnhart, 349 F.3d 549, 555 (8th Cir. 2003)
- Cline v. Sullivan, 939 F.2d 560, 564 (8th Cir. 1991)
- Sobania v. Secretary of Health & Human Services, 879 F.2d 441, 444 (8th Cir. 1989)
- Bates v. Chater, 54 F.3d 529, 532 (8th Cir. 1995)
- Roe v. Chater, 92 F.3d 672, 675 (8th Cir. 1996)
- Naber v. Shalala, 22 F.3d 186, 188 (8th Cir. 1994)
- Finch v. Astrue, 547 F.3d 933, 935 (8th Cir. 2008)
- Browning v. Sullivan, 958 F.2d 817, 822 (8th Cir. 1992)
- Baker v. Heckler, 730 F.2d 1147, 1150 (8th Cir. 1984)
- Goff v. Barnhart, 421 F.3d 785, 789 (8th Cir. 2005)
- Grinder v. Gammon, 73 F.3d 793, 795 (8th Cir. 1996)
- Anderson v. City of Bessemer City, 470 U.S. 564, 573 (1985)
- United States v. U.S. Gypsum Co., 333 U.S. 364, 395 (1948)
- Thomas v. Arn, 474 U.S. 140, 150 (1985)

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