

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Patrick F. v. Frank Bisignano, Commissioner of Social Security

No. 1:23-cv-21313 (D.N.J. Dec. 8, 2025) · No. 1:23-cv-21313 · Decided December 8, 2025

SUMMARY

The United States District Court for the District of New Jersey reviewed the denial of Patrick F.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court held that the Administrative Law Judge did not adequately explain the relationship between the plaintiff's alcohol use disorder, mental limitations, and residual functional capacity, preventing meaningful review. The court reversed the Commissioner's decision and remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Norah McCann King
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	December 8, 2025
DOCKET	1:23-cv-21313
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disability Insurance Benefits and Supplemental Security Income. The court reviewed the administrative record and reversed and remanded for further proceedings.
STANDARD OF REVIEW	The court reviews legal issues de novo and reviews the ALJ's factual findings for substantial evidence. Substantial evidence requires more than a scintilla of evidence and means such relevant evidence as a reasonable mind might accept as adequate; the court must review the record as a whole, account for evidence detracting from the ALJ's conclusion, and require sufficient explanation to permit meaningful judicial review.
PRECEDENTIAL VALUE	Unknown; district court opinion
PARTIES	Patrick F. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the RFC determination and connected the assessed mental limitations to the evidence of record.
2. Whether the ALJ properly considered alcohol or drug addiction materiality under the Social Security Act, 20 C.F.R. §§ 404.1535 and 416.935, and SSR 13-2p.
3. Whether the Commissioner's finding of nondisability was supported by substantial evidence and sufficiently articulated for meaningful judicial review.

HOLDINGS

1. The ALJ's reasoning was insufficient because it did not identify the specific functional areas, record evidence, periods, or degree of improvement underlying its conclusions about Plaintiff's mental limitations and alcohol abstinence. Without that explanation, the court could not determine whether substantial evidence supported the RFC or the finding of nondisability.
2. The matter had to be remanded for further consideration of Plaintiff's alcohol use disorder and whether it was material to the disability determination because the ALJ did not adequately explain the relationship between alcohol use, sobriety, mental-health improvement, and functional limitations.

KEY QUOTATIONS

“Under the substantial-evidence standard, a court looks to an existing administrative record and asks whether it contains sufficien[t] evidence to support the agency’s factual determinations.” (2)

“In short, without further explanation and additional citation to the record, the Court simply cannot determine if substantial evidence supports the ALJ’s RFC determination, her finding of nondisability, and, relatedly, whether she properly considered the DAA issue.” (14)

FACTUAL BACKGROUND

The ALJ found that Plaintiff had severe impairments including alcohol use disorder, type II diabetes with peripheral neuropathy, depressive disorder, anxiety disorder, and hypertension. The ALJ determined that Plaintiff retained the capacity for light work with physical and mental limitations and could perform past relevant work and other jobs existing in significant numbers in the national economy. In evaluating the mental limitations and alcohol use disorder, the ALJ stated that Plaintiff's mental health improved with treatment compliance and alcohol abstinence, but did not clearly identify the evidence, periods, degree of improvement, or specific functional areas supporting those conclusions.

PROCEDURAL HISTORY

Plaintiff's applications for Disability Insurance Benefits and Supplemental Security Income were denied initially and on reconsideration. After a hearing, the ALJ found Plaintiff not disabled, and the Appeals Council denied review, making the ALJ's decision final. Plaintiff timely filed this action, consented to magistrate-judge jurisdiction, and the court reversed and remanded under Sentence Four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further consideration of Plaintiff's mental limitations, alcohol use disorder, and RFC determination, with additional explanation and record citations sufficient to permit meaningful judicial review. The ALJ may reach the same nondisability conclusion, but must support it with a properly developed record and adequate reasoning.

CASES CITED

- Knepp v. Apfel, 204 F.3d 78, 83 (3d Cir. 2000)
- Sykes v. Apfel, 228 F.3d 259, 262 (3d Cir. 2000)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Bailey v. Commissioner of Social Security, 354 F. App'x 613, 616 (3d Cir. 2009)
- K.K. ex rel. K.S. v. Commissioner of Social Security, No. 17-2309, 2018 WL 1509091, at *4 (D.N.J. Mar. 27, 2018)
- Hunter Douglas, Inc. v. NLRB, 804 F.2d 808, 812 (3d Cir. 1986)
- Fargnoli v. Massanari, 247 F.3d 34, 38 (3d Cir. 2001)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Kent v. Schweiker, 710 F.2d 110, 114 (3d Cir. 1983)
- Fargnoli v. Massanari, 247 F.3d 34, 38 (3d Cir. 2001)
- Schonewolf v. Callahan, 972 F. Supp. 277, 284-85 (D.N.J. 1997)
- Wallace v. Secretary of Health & Human Services, 722 F.2d 1150, 1153 (3d Cir. 1983)
- Gober v. Matthews, 574 F.2d 772, 776 (3d Cir. 1978)
- Jones v. Barnhart, 364 F.3d 501, 505 (3d Cir. 2004)
- Burnett v. Commissioner of Social Security, 220 F.3d 112, 119, 121 (3d Cir. 2000)
- Plummer v. Apfel, 186 F.3d 422, 429 (3d Cir. 1999)
- Cotter v. Harris, 642 F.2d 700, 705-06 (3d Cir. 1981)
- Cotter v. Harris, 650 F.2d 481, 482 (3d Cir. 1981)
- Podedworny v. Harris, 745 F.2d 210, 221-22 (3d Cir. 1984)
- Adorno v. Shalala, 40 F.3d 43, 48 (3d Cir. 1994)
- Martin v. Commissioner of Social Security, 547 F. App'x 153, 156 (3d Cir. 2013)

- Poulos v. Commissioner of Social Security, 474 F.3d 88, 92 (3d Cir. 2007)
- Bowers v. Commissioner of Social Security, No. CV 16-6589, 2017 WL 4711470, at *3 (D.N.J. Oct. 20, 2017)
- Duvall-Duncan v. Colvin, No. 1:14-CV-17, 2015 WL 1201397, at *13 (M.D. Pa. Mar. 16, 2015)
- Ambrosini v. Astrue, 727 F. Supp. 2d 414, 431-32 (W.D. Pa. 2010)
- Gamret v. Colvin, 994 F. Supp. 2d 695, 698 (W.D. Pa. 2014)
- Sanford v. Commissioner of Social Security, No. CIV. 13-0366 NLH, 2014 WL 1294710, at *2 (D.N.J. Mar. 28, 2014)
- Zuschlag v. Commissioner of Social Security Administration, No. 18-CV-1949, 2020 WL 5525578, at *8 (D.N.J. Sept. 15, 2020)

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