

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
ILLINOIS, WESTERN DIVISION

Vicki A. v. Frank J. Bisignano, Commissioner of Social Security

Vicki A. · No. 3:24-cv-50192 · Decided February 6, 2026

SUMMARY

The United States District Court for the Northern District of Illinois affirmed the Commissioner of Social Security’s denial of Vicki A.’s applications for disability insurance benefits and supplemental security income. The court rejected arguments concerning the retroactive application of Social Security Ruling 24-2p’s five-year past-relevant-work period, the adequacy of the residual functional capacity assessment, and the evaluation of subjective symptoms.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Illinois, Western Division                                                                                                                                                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Michael F. Iasparro                                                                                                                                                                                                                                                                                                                                                                                                                    |
| JURISDICTION          | United States District Court for the Northern District of Illinois, Western Division                                                                                                                                                                                                                                                                                                                                                   |
| DECIDED               | February 6, 2026                                                                                                                                                                                                                                                                                                                                                                                                                       |
| DOCKET                | 3:24-cv-50192                                                                                                                                                                                                                                                                                                                                                                                                                          |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                                                                                               |
| PROCEDURAL POSTURE    | Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of applications for disability insurance benefits and supplemental security income.                                                                                                                                                                                                                                                                              |
| STANDARD OF REVIEW    | The court reviews whether the Commissioner's decision is supported by substantial evidence and is free from legal error. Factual findings supported by substantial evidence are conclusive; the court reviews the record as a whole but may not reweigh evidence, resolve evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's. The court will reverse only if the record compels a contrary result. |
| PRECEDENTIAL VALUE    | unpublished district court opinion                                                                                                                                                                                                                                                                                                                                                                                                     |
| PARTIES               | Vicki A. v. Frank J. Bisignano, Commissioner of Social Security                                                                                                                                                                                                                                                                                                                                                                        |

## TOPICS

judicial review of agency action

agency adjudication

administrative law

rulemaking

## PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

## QUESTIONS PRESENTED

1. Whether the court should apply the Social Security Administration's post-decision five-year definition of past relevant work retroactively to Plaintiff's claims.
2. Whether the ALJ adequately accounted for Plaintiff's moderate limitations in concentration, persistence, or pace in the residual functional capacity assessment.
3. Whether the ALJ improperly evaluated Plaintiff's subjective symptoms.

## HOLDINGS

1. The court must apply the rules in effect when the ALJ issued the decision and therefore would not apply Social Security Ruling 24-2p and the corresponding five-year timeframe retroactively.
2. The ALJ adequately accounted for Plaintiff's moderate concentration, persistence, or pace limitations by limiting her to understanding, remembering, and carrying out simple, routine instructions and making simple work-related decisions.
3. The ALJ's evaluation of Plaintiff's subjective symptoms was adequately supported and was not patently wrong.

## KEY QUOTATIONS

*"Given the Agency's own ruling, the Court lacks authority to substitute its judgment for that of the Agency and cannot apply SSR 24-2p retroactively."* (Discussion Part I)

*"For the foregoing reasons, Plaintiffs motion to reverse or remand the Commissioner's decision is denied, and Defendant's motion for summary judgment is granted. The Commissioner's decision is affirmed."* (Conclusion)

## FACTUAL BACKGROUND

Plaintiff protectively filed for disability insurance benefits and supplemental security income in February 2022, alleging disability beginning November 22, 2019 based on numerous physical and mental conditions. The ALJ found severe impairments of post-traumatic stress disorder, anxiety, and depression, but determined that Plaintiff retained the residual functional capacity for work at all exertional levels subject to limitations to simple, routine instructions and simple work-related decisions. The ALJ relied on generally normal mental-status findings, improvement and control of symptoms with medication and therapy, and state-agency psychological opinions. The ALJ concluded that Plaintiff could perform her past relevant work.

## PROCEDURAL HISTORY

An administrative law judge found Plaintiff not disabled and determined that she could perform her past relevant work as a storage facility rental clerk and hand packager. The Appeals Council denied review on March 18, 2024. Plaintiff filed this action seeking reversal or remand, and the court denied Plaintiff's motion, granted Defendant's motion for summary judgment, and affirmed the Commissioner's decision.

## DISPOSITION

affirmed

## CASES CITED

- Thorlton v. King, 127 F.4th 1078, 1081 (7th Cir. 2025)
- Mandrell v. Kijakazi, 25 F.4th 514, 515 (7th Cir. 2022)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Warnell v. O'Malley, 97 F.4th 1050, 1052–54 (7th Cir. 2024)
- Beardsley v. Colvin, 758 F.3d 834, 836 (7th Cir. 2014)
- Loper Bright Enterprises v. Raimondo, 603 U.S. 369, 412–13 (2024)
- Velasquez-Garcia v. Holder, 760 F.3d 571, 579 (7th Cir. 2014)
- Bowen v. Georgetown University Hospital, 488 U.S. 204, 208 (1988)
- Shilts v. Commissioner of Social Security, No. 3:24-CV-368 JD, 2025 WL 2013577, at \*4 (N.D. Ind. July 17, 2025)
- Pope v. Shalala, 998 F.2d 473, 483 (7th Cir. 1993)
- Kimberly C. v. Commissioner of Social Security Administration, No. 2:23-CV-01469, 2024 WL 4052181, at \*11 (S.D. Ohio Sept. 5, 2024)
- Jarnutowski v. Kijakazi, 48 F.4th 769, 774 (7th Cir. 2022)
- Lothridge v. Saul, 984 F.3d 1227, 1233 (7th Cir. 2021)
- Sanders v. Colvin, 600 F. App'x 469, 470 (7th Cir. 2015) (unpublished)
- Gedatus v. Saul, 994 F.3d 893, 900 (7th Cir. 2021)
- Richards v. Berryhill, 743 F. App'x 26, 30 (7th Cir. 2018) (unpublished)
- Schmidt v. Astrue, 496 F.3d 833, 845 (7th Cir. 2007)
- Outlaw v. Astrue, 412 F. App'x 894, 898 (7th Cir. 2011) (unpublished)
- Grotts v. Kijakazi, 27 F.4th 1273, 1278–79 (7th Cir. 2022)
- Cullinan v. Berryhill, 878 F.3d 598, 603 (7th Cir. 2017)
- Halsell v. Astrue, 357 F. App'x 717, 722 (7th Cir. 2009) (unpublished)
- Prill v. Kijakazi, 23 F.4th 738, 749 (7th Cir. 2022)
- Jones v. Astrue, 623 F.3d 1155, 1162 (7th Cir. 2010)
- Schrank v. Saul, 843 F. App'x 786, 789 (7th Cir. 2021) (unpublished)

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