

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Andrew L. Swango v. Frank Bisignano, Commissioner of Social
Security

Swango · No. 3:25-cv-192-AZ · Decided March 17, 2026

SUMMARY

The United States District Court for the Northern District of Indiana affirmed the Commissioner of Social Security’s denial of Andrew Swango’s application for disability benefits. The Court held that the ALJ’s residual functional capacity determination was supported by substantial evidence and that the ALJ adequately explained the rejection of consulting physician Nicole Dyer’s opinion. Judgment was entered for the Commissioner.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Abizer Zanzi
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	March 17, 2026
DOCKET	3:25-cv-192-AZ
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's final decision denying disability insurance benefits and supplemental security income.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and reverses only when the findings lack substantial evidentiary support or the ALJ applied an erroneous legal standard. The court does not reweigh evidence, resolve evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	Andrew L. Swango v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

disability definition

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately addressed an alleged conflict between the vocational expert's testimony and the Dictionary of Occupational Titles or Social Security policy.
2. Whether the ALJ's residual functional capacity limitation to brief and occasional supervision and coworker interaction was inconsistent with the ability to sustain full-time competitive employment.
3. Whether the ALJ adequately explained the rejection of consulting physician Nicole Dyer's medical opinion under the supportability and consistency requirements.

HOLDINGS

1. The ALJ did not commit reversible error by accepting the vocational expert's testimony because the plaintiff identified no obvious conflict between that testimony and the Dictionary of Occupational Titles, particularly because the DOT does not address restrictions involving supervisor interaction.
2. The ALJ's limitation to brief and occasional supervision and coworker interaction did not preclude full-time competitive employment because it reasonably described work involving independent tasks and limited direct oversight, and the representative jobs identified by the vocational expert reflected that environment.
3. The ALJ adequately explained why Dr. Dyer's opinion was unpersuasive, and substantial evidence supported the ALJ's assessment.
4. The Commissioner's decision denying benefits was supported by substantial evidence and was not based on reversible legal error.

KEY QUOTATIONS

"The phrase 'substantial evidence' is a 'term of art' used throughout administrative law to describe how courts are to review agency factfinding." (Discussion)

"A court reviewing the findings of an ALJ will reverse only if the findings are not supported by substantial evidence, or if the ALJ has applied an erroneous legal standard." (Discussion)

"Weighing conflicting evidence from medical experts, however, is exactly what the ALJ is required to do." (Discussion, Part B)

FACTUAL BACKGROUND

Swango, age 47 when he applied for benefits, had previously worked as a janitor, caregiver, housekeeper, and assembler. He alleged disability based on physical and mental impairments, including lumbar degenerative disc disease with bilateral radiculopathy, obesity, COPD, depressive and anxiety disorders, PTSD, and a personality

disorder. The ALJ found that Swango could perform a restricted range of light work, including simple and repetitive tasks with brief and occasional supervision and coworker interaction. Relying on vocational-expert testimony, the ALJ identified representative jobs such as mail clerk, inspector, and assembler, while discounting consulting physician Nicole Dyer's more restrictive opinion.

PROCEDURAL HISTORY

Swango applied for disability benefits on August 19, 2022, alleging disability beginning June 7, 2022. His application was denied initially and on reconsideration. After a November 27, 2023, administrative hearing, the ALJ issued a decision on March 4, 2024, finding Swango not disabled at step five because he could perform other work. The Appeals Council denied review, and Swango filed a complaint in the district court. The district court affirmed the Commissioner's decision and directed entry of judgment for the Commissioner.

DISPOSITION

affirmed

CASES CITED

- *Briscoe v. Barnhart*, 425 F.3d 345, 351 (7th Cir. 2005)
- *Biestek v. Berryhill*, 587 U.S. 97, 102 (2019)
- *Brace v. Saul*, 970 F.3d 818, 821 (7th Cir. 2020)
- *Boiles v. Barnhart*, 395 F.3d 421, 425 (7th Cir. 2005)
- *Roddy v. Astrue*, 705 F.3d 631, 636 (7th Cir. 2013)
- *O'Connor-Spinner v. Astrue*, 627 F.3d 614, 618 (7th Cir. 2010)
- *Scott v. Barnhart*, 297 F.3d 589, 595 (7th Cir. 2002)
- *Diaz v. Chater*, 55 F.3d 300, 307 (7th Cir. 1995)
- *Beardsley v. Colvin*, 758 F.3d 834, 837 (7th Cir. 2014)
- *Wolford v. Kijakazi*, 658 F. Supp. 3d 664, 668 (N.D. Ind. 2023)
- *Overman v. Astrue*, 546 F.3d 456, 463 (7th Cir. 2008)
- *Lorenzo K. v. Commissioner of Social Security*, No. 3:23-CV-550-SJF, 2025 WL 938495, at *9 (N.D. Ind. Mar. 27, 2025)
- *Rice v. Barnhart*, 384 F.3d 363, 371 (7th Cir. 2004)
- *Young v. Barnhart*, 362 F.3d 995, 1001 (7th Cir. 2004)

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