

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, TEXARKANA DIVISION

Rhonda Martz v. Frank Bisgnano, Commissioner, Social Security
Administration

Civil No. 25-cv-04035 (W.D. Ark. Dec. 1, 2025) · No. 25-cv-04035 · Decided December 1, 2025

SUMMARY

The court reviews the Commissioner of Social Security’s denial of Rhonda Martz’s claim for disability insurance benefits. It concludes that the administrative law judge failed to adequately consider Martz’s migraine headaches at step two and in the residual functional capacity assessment, including limitations identified in medical opinions. The court reverses the denial of benefits and remands the matter to the Commissioner for further consideration under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Texarkana Division
WRITING FOR THE COURT	Chrasty Comstock
JURISDICTION	United States District Court for the Western District of Arkansas, Texarkana Division
DECIDED	December 1, 2025
DOCKET	25-cv-04035
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance benefits. The parties filed appeal briefs, and the district court reviewed the administrative record.
STANDARD OF REVIEW	The court reviews whether the Commissioner's findings are supported by substantial evidence on the record as a whole. Substantial evidence is less than a preponderance but sufficient for a reasonable mind to find the evidence adequate. The ALJ's decision must be affirmed when supported by substantial evidence, even if substantial evidence could support a contrary result.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

PARTIES

Rhonda Martz v. Frank Bisgnano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

agency adjudication

administrative law

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to address Martz's migraines at step two and in the RFC assessment.
2. Whether the RFC was supported by substantial evidence when the ALJ did not explain the omission of migraine-related limitations identified in medical opinions.
3. Whether the step-five determination was supported when it relied on an RFC that did not adequately account for Martz's migraines.

HOLDINGS

1. The ALJ's decision was not supported by substantial evidence because the ALJ omitted migraines at step two and failed to adequately address their effects, including medical-opinion evidence of environmental limitations, in the RFC assessment.

KEY QUOTATIONS

"While it is not reversible error to fail to find an impairment severe at step two so long as said impairment is considered in the RFC assessment, failure to find an impairment severe at step two and then failing to consider the effect of the impairment on Plaintiff's RFC is reversible error."

"Therefore, the Court finds remand is necessary for the ALJ to more clearly consider the Plaintiff's migraines and the impact they may have on her RFC."

FACTUAL BACKGROUND

Martz alleged disability from migraines and several physical and mental conditions, including rheumatoid arthritis, lupus, degenerative disc disease, and anemia. The ALJ found several severe impairments but did not determine whether migraines were severe at step two and adopted an RFC that did not include restrictions related to noise, vibration, or hazards associated with migraines. Several medical opinions identified migraines and related environmental limitations, but the ALJ did not explain why those limitations were omitted from the RFC.

PROCEDURAL HISTORY

Martz protectively filed for disability insurance benefits in August 2021, alleging disability beginning March 1, 2019. After a December 2023 administrative hearing, the ALJ issued an unfavorable decision on April 23, 2024,

finding that Martz was not disabled through her date last insured. Martz filed this action, and the district court reversed the Commissioner's decision and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must reconsider Martz's migraines and their impact on her residual functional capacity, including the environmental limitations identified in the medical opinions, and then reconsider the disability determination under sentence four of 42 U.S.C. § 405(g).

CASES CITED

- Ramirez v. Barnhart, 292 F.3d 576, 583 (8th Cir. 2002)
- Edwards v. Barnhart, 314 F.3d 964, 966 (8th Cir. 2003)
- Haley v. Massanari, 258 F.3d 742, 747 (8th Cir. 2001)
- Young v. Apfel, 221 F.3d 1065, 1068 (8th Cir. 2000)
- Misty G. v. Berryhill, 0:18-CV-00587-KMM, 2019 WL 1318355 (D. Minn. Mar. 22, 2019)
- Coleman v. Astrue, No. 4:11CV2131 CDP, 2013 WL 665084, at *10, 20 (E.D. Mo. Feb. 25, 2013)
- Lauer v. Apfel, 245 F.3d 700, 704 (8th Cir. 2001)
- Lewis v. Barnhart, 353 F.3d 642, 646 (8th Cir. 2003)
- St. Clair v. Colvin, 12-cv-4250, 2013 WL 4400832, at *2 (W.D. Mo. Aug. 14, 2013)
- Sarchet v. Chater, 78 F.3d 305, 307 (7th Cir. 1996)
- Arnett v. Astrue, 676 F.3d 586, 592 (7th Cir. 2012)