

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
MISSOURI

Jennifer Ann Sisler v. Commissioner, Social Security Administration

Sisler v. Commissioner, Soc. Sec. Admin., No. 4:24-cv-00778-RK (W.D. Mo. Mar. 31, 2026) · No. Case No. 4:24-cv-00778-RK · Decided March 31, 2026

SUMMARY

The United States District Court for the Western District of Missouri reviewed Jennifer Ann Sisler’s challenge under 42 U.S.C. § 405(g) to the denial of supplemental security income benefits. The court held that the ALJ failed to adequately account for or explain the omission of a persuasive limitation concerning Plaintiff’s ability to adapt to workplace changes under Social Security Ruling 96-8p. The court reversed the ALJ’s decision and remanded for a supplemental administrative hearing and a new written decision.

CASE DETAILS

|                       |                                                                                                                                             |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Western District of Missouri                                                                           |
| WRITING FOR THE COURT | Roseann A. Ketchmark                                                                                                                        |
| JURISDICTION          | United States District Court for the Western District of Missouri, Western Division                                                         |
| DECIDED               | March 31, 2026                                                                                                                              |
| DOCKET                | Case No. 4:24-cv-00778-RK                                                                                                                   |
| DISPOSITION           | reversed_and_remanded                                                                                                                       |
| PROCEDURAL POSTURE    | Appeal from denial of disability benefits by ALJ                                                                                            |
| STANDARD OF REVIEW    | Whether the ALJ's decision complies with the relevant legal requirements and is supported by substantial evidence in the record as a whole. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                 |
| PARTIES               | Jennifer Ann Sisler v. Commissioner, Social Security Administration                                                                         |

TOPICS

- judicial review of agency action
- disability definition
- administrative procedure act
- standard of review

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the ALJ erred in evaluating the persuasiveness of medical opinions under 20 C.F.R. § 416.920c
2. Whether the ALJ failed to comply with SSR 96-8p by not including persuasive limitations in the RFC assessment
3. Whether substantial evidence supports the ALJ's finding that expert opinions limiting Plaintiff to one-to-two-step instructions were unpersuasive

## HOLDINGS

1. The ALJ properly considered both supportability and consistency factors in evaluating the state agency consultants' opinions under § 416.920c.
2. The ALJ failed to comply with SSR 96-8p because the RFC did not account for the persuasive limitation that Plaintiff could only adapt to changes that are predictable and introduced gradually.
3. Substantial evidence supports the ALJ's determination that the one-to-two-step instruction limitation was unpersuasive.

## KEY QUOTATIONS

*“If the ALJ intended the limitation to 'simple work-related decisions as to workplace changes' to account for Plaintiff's adaptation limitation... on this record and without any logical bridge between the RFC limitation and the nature Plaintiff's adaptation limitation... the Court is unable to say whether the ALJ's RFC assessment is supported by substantial evidence.”*

*“The ability to make simple work-related decisions, however, is a different area of mental functioning (judgment) than an ability to deal with changes in the workplace (adaptation).”*

## FACTUAL BACKGROUND

Plaintiff applied for SSI benefits alleging disability beginning June 21, 2022, based on severe mental impairments including major depression disorder, bipolar II disorder, and generalized anxiety disorder. State agency consultants and a consultative examiner found Plaintiff had moderate limitations in understanding/memory, concentration/persistence, social interaction, and adaptation, with opinions she could follow one-to-two-step instructions and would struggle with complex tasks. The ALJ assessed an RFC for simple, routine, repetitive tasks not at production pace, with occasional interactions and simple work-related decisions, but rejected the limitation to one-to-two-step instructions based on Plaintiff's activities of daily living and consultative exam findings.

## PROCEDURAL HISTORY

Plaintiff filed application for SSI benefits, denied at initial and reconsideration levels, hearing before ALJ, ALJ issued unfavorable decision, Appeals Council denied review, Plaintiff sought judicial review under 42 U.S.C. § 405(g).

## DISPOSITION

reversed\_and\_remanded

## REMAND INSTRUCTIONS

Remand for a supplemental administrative hearing followed by a new written decision, leaving to the ALJ to address issues regarding physical RFC, reliance on lack of treatment under SSR 16-3p, and whether Plaintiff's past work as a housekeeper cleaner constitutes past relevant work.

## CASES CITED

- Halverson v. Astrue, 600 F.3d 922, 929 (8th Cir. 2010)
- Ford v. Astrue, 518 F.3d 979, 981 (8th Cir. 2008)
- Cropper v. Dudek, 136 F.4th 809, 813 (8th Cir. 2025)
- Lucus v. Saul, 960 F.3d 1066, 1069 (8th Cir. 2020)
- Grable v. Colvin, 770 F.3d 1196, 1201 (8th Cir. 2014)
- Davis v. Apfel, 239 F.3d 962, 966 (8th Cir. 2001)
- Cline v. Colvin, 771 F.3d 1098, 1102 (8th Cir. 2014)
- Smith v. Colvin, 756 F.3d 621, 625 (8th Cir. 2014)
- Guilliams v. Barnhart, 393 F.3d 798, 801 (8th Cir. 2005)
- Baldwin v. Barnhart, 349 F.3d 549, 555 (8th Cir. 2003)
- Hurd v. Astrue, 621 F.3d 734, 738 (8th Cir. 2010)
- Jones v. Astrue, 619 F.3d 963, 971 (8th Cir. 2010)
- Cox v. Astrue, 495 F.3d 614, 619 (8th Cir. 2007)
- Bonnett v. Kijakazi, 859 F. App'x 19, 20 (8th Cir. 2021)
- Brueggemann v. Barnhart, 348 F.3d 689, 694 (8th Cir. 2003)
- Howard v. Massanari, 255 F.3d 577 (8th Cir. 2001)
- Galloway v. Kijakazi, 46 F.4th 686, 690 (8th Cir. 2022)
- Batson v. Kijakazi, 2022 WL 501405, at \*4 (W.D. Mo. Feb. 18, 2022)
- Richardson v. Colvin, 2017 WL 6420283, at \*2 (W.D. Mo. Dec. 18, 2017)
- Lewis v. Barnhart, 353 F.3d 642, 646 (8th Cir. 2003)
- Hepp v. Astrue, 511 F.3d 798, 806 (8th Cir. 2008)
- Jennifer v. Kijakazi, 2023 WL 3998033, at \*4-5 (E.D. Mo. May 26, 2023)
- McGehee v. Saul, 2019 WL 6219507, at \*10 (D.N.M. Nov. 21, 2019)
- Hardy v. Dudek, 2025 WL 917222, at \*7 (E.D. Mo. Mar. 26, 2025)
- Thurman v. Colvin, 2013 WL 2385231, at \*4 (W.D. Ark. May 30, 2013)
- Reece v. Colvin, 834 F.3d 904, 910 (8th Cir. 2016)
- Singh v. Apfel, 222 F.3d 448 (8th Cir. 2000)

- Alicia G. v. O'Malley, 2024 WL 53105, at \*6 (D. Kan. Jan. 4, 2024)

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