

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Annette Straub v. Frank Bisignano, Commissioner of Social Security

Annette Straub v. Frank Bisignano, Commissioner of Social Security · No. 1:25-cv-00078 · Decided March 30, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviews the Commissioner of Social Security’s denial of Annette Straub’s claims for disability insurance benefits and supplemental security income. The court concludes that the administrative decision is unsupported by substantial evidence in material respects, including the evaluation of Straub’s migraine headaches, and remands the case to the Commissioner for further proceedings.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Susan E. Schwab
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 30, 2026
DOCKET	1:25-cv-00078
DISPOSITION	vacated
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying claims for disability insurance benefits and supplemental security income.
STANDARD OF REVIEW	The court has plenary review of legal issues and reviews factual findings for substantial evidence, scrutinizing the record as a whole. The court also reviews whether the Commissioner applied the correct legal standards and adequately articulated the basis for the decision.
PRECEDENTIAL VALUE	Unknown; memorandum opinion from a United States district court with no reporter citation or stated precedential designation.
PARTIES	Annette Straub v. Frank Bisignano, Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ adequately articulated the step-three analysis concerning whether Straub's migraine headaches medically equaled Listing 11.02.
2. Whether the ALJ's failure to adequately analyze medical equivalence was harmless.
3. Whether remand for further administrative proceedings or an award of benefits was the appropriate remedy.

HOLDINGS

1. The ALJ failed to adequately articulate the step-three analysis because the decision did not address the requirements of Listing 11.02B or 11.02D or the factors identified in Social Security Ruling 19-4p, including headache frequency, severity and duration, treatment side effects, and functional limitations.
2. The error was not harmless because Straub identified record evidence that could support application of Listing 11.02, and the court could not conclude that no set of facts would entitle her to benefits.
3. Remand for further proceedings was appropriate rather than an immediate award of benefits.

KEY QUOTATIONS

“But reading the ALJ’s decision as a whole—including his discussion of Straub’s headaches in connection the RFC assessment—we nevertheless conclude that the ALJ’s step three analysis is beyond meaningful judicial review.” (Discussion section V.B)

“In sum, the ALJ’s step three analysis—even when coupled with his later RFC assessment—fails to adequately address whether Straub’s migraine headaches are equivalent to Listing 11.02 in accordance with SSR 19-4p, which “prevents the Court from conducting a meaningful, albeit deferential, review.”” (Discussion section V.B)

FACTUAL BACKGROUND

Straub alleged disability beginning April 1, 2013, based principally on degenerative disc disease, migraine headaches, and mental impairments. The administrative record included evidence of recurring migraines, medication changes, neurological treatment, and reports of headaches requiring her to lie down in a quiet location. The ALJ found that Straub could perform a restricted range of sedentary work and denied benefits at step five, but did not adequately explain whether her migraines medically equaled Listing 11.02 under Social Security Ruling 19-4p.

PROCEDURAL HISTORY

Straub applied for disability insurance benefits and supplemental security income, but the Commissioner denied her claims administratively. After a hearing, the ALJ denied benefits, and the Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Straub then filed this action seeking reversal and benefits or, alternatively, remand. The court vacated the Commissioner's decision and remanded for further proceedings because the ALJ inadequately articulated the step-three analysis of whether Straub's migraine headaches medically equaled Listing 11.02.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Remand to the Commissioner for further proceedings pursuant to sentence four of 42 U.S.C. § 405(g), including an adequate analysis of whether Straub's migraine headaches medically equal Listing 11.02 under Social Security Ruling 19-4p. The court did not decide Straub's remaining claims concerning the evaluation of her mental impairments.

CASES CITED

- *Ficca v. Astrue*, 901 F. Supp. 2d 533, 536 (M.D. Pa. 2012)
- *Biestek v. Berryhill*, 587 U.S. 97, 99, 103 (2019)
- *Consolidated Edison Co. of New York v. N.L.R.B.*, 305 U.S. 197, 229 (1938)
- *Jesurum v. Secretary of U.S. Department of Health & Human Services*, 48 F.3d 114, 117 (3d Cir. 1995)
- *Mason v. Shalala*, 994 F.2d 1058, 1064 (3d Cir. 1993)
- *Consolo v. Federal Maritime Commission*, 383 U.S. 607, 620 (1966)
- *Leslie v. Barnhart*, 304 F. Supp. 2d 623, 627 (M.D. Pa. 2003)
- *Hess v. Commissioner of Social Security*, 931 F.3d 198, 198 n.2, 202 (3d Cir. 2019)
- *Burnett v. Commissioner of Social Security Administration*, 220 F.3d 112, 119-21 (3d Cir. 2000)
- *Hartranft v. Apfel*, 181 F.3d 358, 359 n.1 (3d Cir. 1999)
- *Smith v. Commissioner of Social Security*, 631 F.3d 632, 634 (3d Cir. 2010)
- *Fargnoli v. Massanari*, 247 F.3d 34, 39, 44 n.7 (3d Cir. 2001)
- *Cotter v. Harris*, 642 F.2d 700, 704-05 (3d Cir. 1981)
- *Schaudeck v. Commissioner of Social Security Administration*, 181 F.3d 429, 433 (3d Cir. 1999)
- *Johnson v. Commissioner of Social Security*, 529 F.3d 198, 204 (3d Cir. 2008)
- *Sullivan v. Zebley*, 493 U.S. 521, 530-32 (1990)
- *Plummer v. Apfel*, 186 F.3d 422, 428 (3d Cir. 1999)
- *Jones v. Barnhart*, 364 F.3d 501, 505 (3d Cir. 2004)
- *Diaz v. Commissioner of Social Security*, 577 F.3d 500, 504 (3d Cir. 2009)
- *Izalia V. v. O'Malley*, 2024 WL 4505469, at *5 (M.D. Pa. Oct. 16, 2024)

- Fewell v. O'Malley, 2024 WL 4182115, at *4, *6 (M.D. Pa. Aug. 19, 2024), report and recommendation adopted, 2024 WL 4173790 (M.D. Pa. Sept. 12, 2024)
- Tyson v. Kijakazi, 2022 WL 3975002, at *10, *15 (M.D. Pa. July 25, 2022), report and recommendation adopted, 2022 WL 3971041 (M.D. Pa. Aug. 31, 2022)
- Falardo-Weller v. Kijakazi, 2023 WL 6119101, at *6, *8-*9 (M.D. Pa. Sept. 18, 2023)
- Amy B. v. Bisignano, 2026 WL 567656, at *8 (M.D. Pa. Jan. 28, 2026), report and recommendation adopted, 2026 WL 565809, at *1 (M.D. Pa. Feb. 27, 2026)
- Holloman v. Commissioner of Social Security, 639 F. App'x 810, 814 (3d Cir. 2016)
- Shinseki v. Sanders, 556 U.S. 396, 413 (2009)
- Brown v. Astrue, 649 F.3d 193, 195 (3d Cir. 2011)
- Securities & Exchange Commission v. Chenery Corp., 318 U.S. 80, 87 (1943)
- Brownawell v. Commissioner of Social Security, 554 F.3d 352, 358 (3d Cir. 2008)
- Morales v. Apfel, 225 F.3d 310, 320 (3d Cir. 2000)
- Podedworny v. Harris, 745 F.2d 210, 221-23 (3d Cir. 1984)
- Diaz v. Berryhill, 388 F. Supp. 3d 382, 391 (M.D. Pa. 2019)