

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

David B. v. Frank Bisignano, Commissioner of Social Security
Administration

David B. · No. 4:25-CV-839 SRW · Decided April 6, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri reviews the Social Security Administration’s denial of David B.’s application for disability insurance benefits. The court concludes that the ALJ did not adequately explain the consistency analysis concerning nurse practitioner Kacey Patterson’s medical opinion under 20 C.F.R. § 404.1520c. The court reverses the Commissioner’s denial and remands the case for further proceedings.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	April 6, 2026
DOCKET	4:25-CV-839 SRW
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying Plaintiff's application for disability insurance benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence on the record as a whole and applies the relevant legal standards. It considers evidence supporting and detracting from the ALJ's decision, does not reweigh the evidence, and defers to credibility determinations supported by good reasons and substantial evidence.
PRECEDENTIAL VALUE	unpublished
PARTIES	David B. v. Frank Bisignano, Commissioner of Social Security Administration

TOPICS

judicial review of agency action

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disability definition

PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated and explained the supportability and consistency of Nurse Practitioner Kacey Patterson's medical opinion under 20 C.F.R. § 404.1520c.
2. Whether substantial evidence supported the ALJ's residual functional capacity assessment and the Commissioner's denial of disability benefits.

HOLDINGS

1. The ALJ failed to adequately explain the consistency of NP Patterson's medical opinion with the longitudinal record because the ALJ relied on a conclusory statement and a string citation without identifying which records demonstrated improvement or stabilization or explaining how those records conflicted with the functional limitations Patterson identified.
2. The Commissioner's denial of Plaintiff's disability application must be reversed and the case remanded for reconsideration and further proceedings consistent with the opinion.

KEY QUOTATIONS

“An ALJ’s mere use of the word “consistent” does not satisfy the regulatory requirement.”

“Simply, the ALJ has failed to sufficiently address the consistency of NP Patterson’s medical opinion with the entirety of the medical record.”

FACTUAL BACKGROUND

David B. alleged disability beginning May 26, 2022, based principally on severe mental-health impairments, including depressive, bipolar, and related disorders and anxiety. He experienced manic and psychotic symptoms requiring emergency treatment and a lengthy involuntary psychiatric hospitalization in 2022, followed by structured behavioral-health treatment. During subsequent treatment, he showed clinical improvement and stabilization but continued to experience depression, fatigue, decreased motivation, social withdrawal, suicidal thoughts, medication-management difficulties, and a need for community support. His treating psychiatric nurse practitioner, Kacey Patterson, completed a medical source statement identifying numerous marked and extreme mental-work limitations and predicting more than four absences per month.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits, and the application was denied initially and on reconsideration. Following a telephonic hearing, the ALJ issued an unfavorable decision. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court reversed and remanded under

sentence four of 42 U.S.C. § 405(g) for further proceedings because the ALJ inadequately explained the consistency of a treating nurse practitioner's medical opinion with the record.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for reconsideration and further proceedings consistent with the opinion, including adequate evaluation and explanation of the supportability and consistency of NP Patterson's medical opinion under 20 C.F.R. § 404.1520c.

CASES CITED

- Hurd v. Astrue, 621 F.3d 734, 738 (8th Cir. 2010)
- Kirby v. Astrue, 500 F.3d 705, 707 (8th Cir. 2007)
- Martise v. Astrue, 641 F.3d 909, 923 (8th Cir. 2011)
- Boyd v. Colvin, 831 F.3d 1015, 1020 (8th Cir. 2016)
- Hensley v. Colvin, 829 F.3d 926, 932 (8th Cir. 2016)
- Brock v. Astrue, 574 F.3d 1062, 1064 (8th Cir. 2012)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Reece v. Colvin, 834 F.3d 904, 908 (8th Cir. 2016)
- KKC ex rel. Stoner v. Colvin, 818 F.3d 364, 370 (8th Cir. 2016)
- Brian O. v. Commissioner of Social Security, 2020 WL 3077009, at *4-5 (N.D.N.Y. June 10, 2020)
- Martini v. Kijakazi, 2022 WL 705528, at *4-5 (E.D. Mo. Mar. 9, 2022)
- Lucas v. Saul, 960 F.3d 1066, 1069 (8th Cir. 2020)
- Walker v. Commissioner, Social Security Administration, 911 F.3d 550, 554 (8th Cir. 2018)
- Pipkins v. Kijakazi, 2022 WL 218898, at *4 (E.D. Mo. Jan. 25, 2022)
- Hirner v. Saul, 2022 WL 3153720, at *9 (E.D. Mo. Aug. 8, 2022)
- Trosper v. Saul, 2021 WL 1857124, at *5 (E.D. Mo. May 10, 2021)
- Krieg v. Kijakazi, 2023 WL 4824558, at *9 (E.D. Mo. July 27, 2023)
- Milam v. Colvin, 794 F.3d 978, 983 (8th Cir. 2015)