

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA

Tiyana M. v. Frank Bisignano, Commissioner of Social Security

No. 25-CV-1929 (E.D. Pa. Jan. 20, 2026) · No. No. 25-CV-1929 · Decided January 20, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania reviews the Commissioner of Social Security’s denial of Tiyana M.’s claims for Disability Insurance Benefits and Supplemental Security Income. The court recommends granting the request for review in part and remanding for evaluation by a rheumatologist of medical records concerning fibromyalgia and related autoimmune conditions. It also directs reevaluation of the claimant’s subjective symptom statements in light of the new medical opinion evidence.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                      |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Pennsylvania                                                                                                                                                                                                                |
| WRITING FOR THE COURT | Scott W. Reid                                                                                                                                                                                                                                                                        |
| JURISDICTION          | United States District Court for the Eastern District of Pennsylvania                                                                                                                                                                                                                |
| DECIDED               | January 20, 2026                                                                                                                                                                                                                                                                     |
| DOCKET                | No. 25-CV-1929                                                                                                                                                                                                                                                                       |
| DISPOSITION           | remanded                                                                                                                                                                                                                                                                             |
| PROCEDURAL POSTURE    | Action under 42 U.S.C. § 405(g) seeking judicial review of the Commissioner's denial of Disability Insurance Benefits and Supplemental Security Income. The claimant filed a Request for Review, and the court recommended granting the request in part and remanding to the agency. |
| STANDARD OF REVIEW    | Whether the Commissioner's decision is supported by substantial evidence and whether the ALJ applied the proper legal standards.                                                                                                                                                     |
| PRECEDENTIAL VALUE    | Unknown                                                                                                                                                                                                                                                                              |
| PARTIES               | Tiyana M. v. Frank Bisignano, Commissioner of Social Security                                                                                                                                                                                                                        |

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- civil procedure

## PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

## QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of the consulting examiner's opinion concerning functional limitations caused by fibromyalgia.
2. Whether the ALJ's reliance on largely normal clinical findings and the absence of cited contradictory treatment records was supported by substantial evidence.
3. Whether the claimant's subjective reports should be reevaluated in light of additional medical opinion evidence on remand.

## HOLDINGS

1. The ALJ's assessment of Nurse Slade's opinion was not supported by substantial evidence because the ALJ dismissed limitations based largely on painful trigger points and largely normal examination findings without adequately addressing the opinion's consistency with the medical record or identifying specific contradictory treatment records.
2. The matter must be remanded to the agency for review of the relevant medical records by a rheumatologist and for a supplemental or amended ALJ decision addressing the claimant's functioning during the relevant period.
3. On remand, the ALJ should reevaluate Tiyana M.'s subjective claims in light of the new medical opinion evidence obtained from a rheumatologist.

## KEY QUOTATIONS

*"Therefore, it was illogical for the ALJ to dismiss Nurse Slade's finding of limitations on the basis that it was based largely on painful trigger points." (Section IV.A)*

*"As a whole, therefore, the ALJ's assessment of Nurse Slade's opinions was not supported by substantial evidence." (Section IV.A)*

*"I conclude that the Plaintiff's Request for Review should be granted in part and the matter remanded to the Agency for review of the relevant medical records by a rheumatologist, followed by the issuance of a supplemental or amended decision by the ALJ." (Section V)*

## FACTUAL BACKGROUND

Tiyana M. alleged disability beginning December 2, 2021, based principally on Sjogren's syndrome, fibromyalgia, hypertension, depression, and anxiety. A consulting examiner diagnosed fibromyalgia and documented positive trigger points, reduced strength, decreased hand and finger dexterity, and significant limitations in standing, walking, lifting, handling, and fingering. The ALJ found that she had several severe impairments but retained the capacity for a restricted range of light work, and denied benefits after finding that she could perform other jobs.

## PROCEDURAL HISTORY

Tiyana M.'s applications for DIB and SSI were denied initially and on reconsideration. Following a January 18, 2024 hearing, the ALJ denied benefits on May 14, 2024, and the Appeals Council denied review on March 5, 2025. Tiyana M. then brought this action for review of the Commissioner's final decision.

## DISPOSITION

remanded

## REMAND INSTRUCTIONS

The agency must obtain review of the relevant medical records by a rheumatologist, including an opinion regarding how and to what extent the claimant's autoimmune conditions, including fibromyalgia, limited her functioning during the relevant period. The ALJ must then issue a supplemental or amended decision and reevaluate the claimant's subjective reports in light of the new evidence.

## CASES CITED

- Richardson v. Perales, 402 U.S. 389 (1971)
- Newhouse v. Heckler, 753 F.2d 283, 285 (3d Cir. 1985)
- Coria v. Heckler, 750 F.2d 245 (3d Cir. 1984)
- Palmisano v. Saul, Civ. A. No. 20-1628605, 2021 WL 162805, at \*3 (E.D. Pa. Apr. 27, 2021)
- Henderson v. Astrue, 887 F. Supp. 2d 617, 634-36 (W.D. Pa. 2012)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 244 (6th Cir. 2007)
- Emily K. v. Dudek, No. 3:22-CV-3279, 2025 WL 762688, at \*10 (D.N.J. Mar. 11, 2025)
- Foley v. Barnhart, 432 F. Supp. 2d 465, 475 (M.D. Pa. 2005)

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