

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Brandon B. v. Commissioner of Social Security

Brandon B. · No. 1:22-CV-00184 CDH · Decided February 27, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the Commissioner of Social Security’s denial of Brandon B.’s application for disability insurance benefits. The court held that the administrative law judge failed to adequately explain the supportability and consistency factors when evaluating medical opinions under 20 C.F.R. § 404.1520c. The court granted the plaintiff’s motion in part, denied the Commissioner’s motion, and remanded the matter for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Colleen D. Holland
JURISDICTION	United States District Court for the Western District of New York
DECIDED	February 27, 2026
DOCKET	1:22-CV-00184 CDH
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The parties moved for judgment on the pleadings.
STANDARD OF REVIEW	The court reviews whether the Commissioner's conclusions are supported by substantial evidence and based on the correct legal standard. Findings of fact supported by substantial evidence are conclusive, while legal conclusions are reviewed without deference.
PRECEDENTIAL VALUE	unpublished district court decision
PARTIES	Brandon B. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication

PRACTICE AREAS

Social Security

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ complied with 20 C.F.R. § 404.1520c by adequately explaining the supportability and consistency of the medical opinions of Mental Health Counselor Staphanie Fisk and Nurse Practitioner Peter Coggiola.
2. Whether the ALJ adequately evaluated the supportability of Dr. Sydney Domanowski's June 16, 2020 medical opinion.
3. Whether the errors in evaluating the medical opinions required remand for further administrative proceedings.

HOLDINGS

1. The ALJ failed to adequately articulate the supportability factor when evaluating the persuasiveness of MHC Fisk and NP Coggiola's joint medical opinion.
2. The ALJ failed to adequately explain the supportability and consistency of Dr. Domanowski's June 16, 2020 opinion.
3. The ALJ did not commit reversible error by failing to analyze Dr. Domanowski's statement that Plaintiff was fully disabled and unable to work as a medical opinion.

KEY QUOTATIONS

“The ALJ plainly did not comply with the regulations in assessing MHC Fisk and NP Coggiola’s joint opinion.” (Discussion II.B)

“Under these circumstances, “the Court is left to guess at the ALJ’s reasoning, which frustrates meaningful review.”” (Discussion II.B)

“For the foregoing reasons, Plaintiff’s motion for judgment on the pleadings (Dkt. 5) is granted to the extent that the matter is remanded for further administrative proceedings, and the Commissioner’s motion for judgment on the pleadings (Dkt. 6) is denied.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff applied for disability insurance benefits, alleging disability beginning June 5, 2019, based primarily on mental-health conditions. The ALJ found severe anxiety disorder, major depressive disorder, bipolar disorder, and Asperger's Syndrome, but determined that Plaintiff retained the residual functional capacity for work at all exertional levels with restrictions to simple tasks, no fast-paced quotas, and at most occasional contact with others. The ALJ found that Plaintiff could not perform past relevant work but could perform jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff filed an application for disability insurance benefits that was denied initially and on reconsideration. After an administrative hearing, the ALJ issued an unfavorable decision, and the Appeals Council denied review. Plaintiff then filed this action and moved for judgment on the pleadings; the court remanded for further administrative proceedings and denied the Commissioner's motion.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further administrative proceedings so that the ALJ can explain the supportability and consistency factors concerning the medical opinion evidence and further develop the record as necessary.

CASES CITED

- *Szczepanski v. Saul*, 946 F.3d 152, 156 (2d Cir. 2020)
- *Selian v. Astrue*, 708 F.3d 409, 418 (2d Cir. 2013)
- *Rosa v. Callahan*, 168 F.3d 72, 77 (2d Cir. 1999)
- *Schaal v. Apfel*, 134 F.3d 496, 501 (2d Cir. 1998)
- *Selian v. Astrue*, 708 F.3d 409, 417 (2d Cir. 2013)
- *Moran v. Astrue*, 569 F.3d 108, 112 (2d Cir. 2009)
- *Byam v. Barnhart*, 336 F.3d 172, 179 (2d Cir. 2003)
- *Matta v. Astrue*, 508 F. App'x 53, 56 (2d Cir. 2013)
- *Ayala v. Kijakazi*, 620 F. Supp. 3d 6, 30 (S.D.N.Y. 2022)
- *Jackson v. Kijakazi*, 588 F. Supp. 3d 558, 585 (S.D.N.Y. 2022)
- *Kaliegh O. o/b/o S.S.T. v. Commissioner of Social Security*, No. 5:24-CV-0662 (MAD/TWD), 2025 WL 2933177, at *5 (N.D.N.Y. Aug. 11, 2025)
- *Loni S. v. Commissioner of Social Security*, No. 3:22-CV-805 (CFH), 2023 WL 4195887, at *15 (N.D.N.Y. June 27, 2023)
- *Nicole L. v. Kijakazi*, No. 6:20-CV-01576 (NAM), 2022 WL 160274, at *8 (N.D.N.Y. Jan. 18, 2022)
- *Zabala v. Astrue*, 595 F.3d 402, 410 (2d Cir. 2010)

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