

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

Wendy Woehrmann v. Frank J. Bisignano, Commissioner of Social
Security

No. 4:24-cv-1340-RHH (E.D. Mo. Mar. 27, 2026) · No. No. 4:24-cv-1340-RHH · Decided March 27, 2026

SUMMARY

The court reverses and remands the Commissioner of Social Security’s denial of Wendy Woehrmann’s application for Disability Insurance Benefits. The court holds that the administrative law judge did not adequately explain the supportability and consistency of the medical opinion evidence as required by 20 C.F.R. § 404.1520c. The court does not reach Woehrmann’s remaining arguments.

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	March 27, 2026
DOCKET	No. 4:24-cv-1340-RHH
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal under 42 U.S.C. § 405(g) from the Commissioner of Social Security's denial of Disability Insurance Benefits. The parties consented to magistrate-judge jurisdiction under 28 U.S.C. § 636(c).
STANDARD OF REVIEW	The court must affirm if the Commissioner's decision complies with applicable legal requirements and is supported by substantial evidence in the record as a whole. The court considers evidence supporting and detracting from the decision, but does not reweigh the evidence or substitute its judgment for the ALJ's credibility determinations when those determinations are supported by good reasons and substantial evidence.
PRECEDENTIAL VALUE	unpublished district-court memorandum and order; precedential status not stated
PARTIES	Wendy Woehrmann v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

administrative procedure act

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

disability law

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of the medical opinions and prior administrative medical findings under 20 C.F.R. § 404.1520c.
2. Whether the ALJ's failure to independently explain the supportability and consistency of the medical opinions constituted reversible error.
3. Whether the case should be remanded for reconsideration of the medical opinion evidence rather than for an immediate award of benefits.

HOLDINGS

1. The ALJ erred by failing to explain adequately how the medical opinions and prior administrative medical findings were supported by objective evidence and consistent with the record, as required by 20 C.F.R. § 404.1520c(b)(2).
2. The ALJ may not formulate an RFC and then assess medical opinions merely by whether they support that preexisting RFC; the ALJ must independently evaluate the medical opinions before formulating the RFC.
3. The appropriate remedy was reversal and remand for further administrative proceedings and reconsideration of the medical opinion evidence, rather than an immediate award of benefits.

KEY QUOTATIONS

“The ALJ’s mere summary of certain medical records does not constitute an explanation of the degree to which this objective medical evidence supports the medical opinions expressed.” (Section V.A.)

“In order to properly evaluate the medical opinion evidence, the regulations direct the ALJ to specifically address the supportability of the medical opinion itself, not the supportability of the RFC.” (Section V.A.)

“Accordingly, IT IS HEREBY ORDERED that pursuant to sentence four of 42 U.S.C. § 405(g), the decision of the Commissioner is REVERSED, and this cause is REMANDED to the Commissioner for further consideration consistent with this opinion.” (Section VI)

FACTUAL BACKGROUND

Wendy Woehrmann alleged disability based on physical and mental conditions including residual effects of breast-cancer treatment, pain, headaches, depression, anxiety, cognitive dysfunction, and COPD. The ALJ found severe impairments consisting of depression, anxiety, headaches, residual effects from right-breast-cancer treatment, and COPD, and determined that Woehrmann retained the residual functional capacity for restricted light work. The ALJ concluded that she could not perform past relevant work but could perform other jobs

existing in significant numbers in the national economy. The district court focused on the ALJ's treatment of the medical opinions concerning Woehrmann's physical and mental limitations.

PROCEDURAL HISTORY

Woehrmann applied for Disability Insurance Benefits in April 2019, alleging disability beginning November 10, 2018. The application was denied initially and on reconsideration. Following an administrative hearing, the ALJ determined that Woehrmann was not disabled through December 31, 2021. The Appeals Council denied review on August 27, 2024. The district court reversed the Commissioner's decision and remanded under sentence four of 42 U.S.C. § 405(g) because the ALJ inadequately evaluated the medical opinion evidence.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must reconsider the claim and fully evaluate and explain the supportability and consistency of all medical opinion evidence in accordance with 20 C.F.R. § 404.1520c. The court did not reach Woehrmann's remaining arguments concerning the physical RFC and evaluation of pain and other subjective reports.

CASES CITED

- Hurd v. Astrue, 621 F.3d 734, 738 (8th Cir. 2010)
- Singh v. Apfel, 222 F.3d 448, 451 (8th Cir. 2000)
- Pearsall v. Massanari, 274 F.3d 1211, 1217 (8th Cir. 2001)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Pate-Fires v. Astrue, 564 F.3d 935, 942 (8th Cir. 2009)
- Estes v. Barnhart, 275 F.3d 722, 724 (8th Cir. 2002)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Renstrom v. Astrue, 680 F.3d 1057, 1063-64 (8th Cir. 2012)
- Gonzales v. Barnhart, 465 F.3d 890, 894 (8th Cir. 2006)
- Partee v. Astrue, 638 F.3d 860, 863 (8th Cir. 2011)
- Goff v. Barnhart, 421 F.3d 785, 789 (8th Cir. 2005)
- Starman v. Kijakazi, 2021 WL 4459720, at *4 (E.D. Mo. Sept. 29, 2021)
- Nolen v. Kijakazi, 61 F.4th 575, 577 (8th Cir. 2023)
- Swarthout v. Kijakazi, 35 F.4th 608, 611 (8th Cir. 2022)
- Thomas v. Berryhill, 881 F.3d 672, 675 (8th Cir. 2018)
- Martini v. Kijakazi, No. 4:20 CV 1711 CDP, 2022 WL 705528, at *5 (E.D. Mo. Mar. 9, 2022)
- Pipkins v. Kijakazi, No. 1:20 CV 161 CDP, 2022 WL 218898, at *4 (E.D. Mo. Jan. 25, 2022)
- Lucas v. Saul, 960 F.3d 1066, 1069-70 (8th Cir. 2020)

- Bonnett v. Kijakazi, 859 F. App'x 19, 20 (8th Cir. 2021)
- McKinney v. O'Malley, No. 23-3220, 2024 WL 1327965, at *1 (8th Cir. Mar. 28, 2024)
- Starman v. Kijakazi, No. 2:20-CV-00035-SRC, 2021 WL 4459729, at *5 (E.D. Mo. Sept. 29, 2021)
- Doss v. Soc. Sec. Admin., No. 4:25-CV-00408-WJE, 2026 WL 456846, at *4 (W.D. Mo. Feb. 18, 2026)
- Viessman v. Saul, No. 4:19-CV-04063-VLD, 2020 WL 133431, at *17 (D.S.D. Jan. 13, 2020)
- Hirner v. Saul, No. 2:21-CV-38 SRW, 2022 WL 3153720, at *9-10 (E.D. Mo. Aug. 8, 2022)
- Buckner v. Apfel, 213 F.3d 1006, 1011 (8th Cir. 2000)
- Leeper v. Colvin, No. 4:13-CV-367 ACL, 2014 WL 4713280, at *11 (E.D. Mo. Sept. 22, 2014)

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