

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, PEORIA DIVISION

Ronald C. v. Frank Bisignano, Commissioner of Social Security

Ronald C. v. Bisignano, No. 1:25-cv-01158-RLH (C.D. Ill. May 18, 2026) · No. 1:25-cv-01158-RLH · Decided
May 18, 2026

SUMMARY

The United States District Court for the Central District of Illinois affirmed the Commissioner of Social Security’s denial of Ronald C.’s applications for disability and supplemental security income benefits. The court held that the administrative law judge’s decision was supported by substantial evidence, and that although the ALJ failed to expressly discuss one psychologist’s opinion, the omission was harmless.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Ronald L. Hanna
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	May 18, 2026
DOCKET	1:25-cv-01158-RLH
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's denial of supplemental security income and disability benefits under 42 U.S.C. § 405(g), following a prior remand by the same court and a second unfavorable administrative decision.
STANDARD OF REVIEW	The court determines whether the ALJ's findings are supported by substantial evidence and based on proper legal criteria. It may not reweigh evidence, resolve debatable evidentiary conflicts, determine credibility, or substitute its judgment for the ALJ's, but it may not simply rubber-stamp the decision. The ALJ must build an accurate and logical bridge between the evidence and the conclusions.
PRECEDENTIAL VALUE	unpublished

PARTIES

Ronald C. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Dr. Benjamin Richter's medical opinions under the applicable Social Security regulations.
2. Whether the ALJ's failure to expressly discuss psychologist Dr. Drake Steed's medical opinion required remand.
3. Whether the ALJ complied with the court's prior remand order concerning the evaluation of examining medical opinions.

HOLDINGS

1. The ALJ adequately evaluated Dr. Richter's opinions by identifying the portions he accepted and rejected and explaining that the conclusion that Ronald was suitable for disability benefits addressed an issue reserved to the Commissioner and was not persuasive.
2. Although the ALJ erred by failing to expressly evaluate Dr. Steed's medical opinion, the error was harmless and did not require remand because the opinion did not undermine the RFC or step-five finding.
3. The ALJ's obligations under the prior remand order were coextensive with the applicable regulatory requirements; the order imposed no independent medical-opinion obligation beyond compliance with those regulations.

KEY QUOTATIONS

“A court’s function on review is limited to determining whether the ALJ’s findings are supported by substantial evidence and based upon proper legal criteria.” (Legal Standard, Part II)

“Although the ALJ erred by failing to discuss Dr. Steed’s opinion, the Court is confident that the result would not change on remand.” (Discussion, Part II)

FACTUAL BACKGROUND

Ronald was born in 1982, completed high school, and previously worked as an industrial mechanic or millwright. He stopped working in 2017 after a car accident causing a traumatic brain injury and alleged disability based principally on back problems, the brain injury, and mental-health impairments including attention deficit disorder. The ALJ found severe degenerative disc disease, a history of traumatic brain injury

with migraine, a history of attention deficit disorder, and anxiety disorder, but determined that Ronald retained the RFC for light work with physical and non-exertional restrictions. Based on vocational evidence, the ALJ found that Ronald could perform light, unskilled jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Ronald applied for benefits in November 2019, alleging disability beginning March 24, 2017. The application was initially denied and denied on reconsideration; after a hearing, an ALJ found him not disabled, and the Appeals Council affirmed. In the first judicial action, the parties jointly moved to remand, and the court ordered a new hearing with further evaluation of examining opinions and vocational-expert testimony. The Appeals Council vacated the prior decision and directed further consideration of RFC and available work. After a second hearing, the ALJ again found Ronald not disabled, and Ronald filed this action without seeking Appeals Council review of the second decision. The court affirmed the Commissioner's decision and directed the Clerk to enter judgment and close the case.

DISPOSITION

affirmed

CASES CITED

- Moore v. Colvin, 743 F.3d 1118, 1121 (7th Cir. 2014)
- Wilder v. Kijakazi, 22 F.4th 644, 651 (7th Cir. 2022)
- Weatherbee v. Astrue, 649 F.3d 565, 569 (7th Cir. 2011)
- Clifford v. Apfel, 227 F.3d 863, 869 (7th Cir. 2000)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Schneck v. Barnhart, 357 F.3d 697, 699 (7th Cir. 2004)
- Scott v. Barnhart, 297 F.3d 589, 593 (7th Cir. 2002)
- Warnell v. O'Malley, 97 F.4th 1050, 1053–54 (7th Cir. 2024)
- Herr v. Sullivan, 912 F.2d 178, 181 (7th Cir. 1990)
- Gedatus v. Saul, 994 F.3d 893, 900 (7th Cir. 2021)
- Roddy v. Astrue, 705 F.3d 631, 638 (7th Cir. 2013)
- Spicher v. Berryhill, 898 F.3d 754, 758 (7th Cir. 2018)
- Kolar v. Berryhill, 695 F. App'x 161, 161–62 (7th Cir. 2017)
- Young v. Barnhart, 362 F.3d 995, 1001 (7th Cir. 2004)
- Colson v. Colvin, 120 F. Supp. 3d 778, 793 (N.D. Ill. 2015)
- Wolford v. Kijakazi, 658 F. Supp. 3d 664, 670–71 (N.D. Ind. 2023)
- Thomas H. v. Kijakazi, No. 3:22-cv-50331, 2023 WL 6388145, at *2 (N.D. Ill. Sept. 29, 2023)

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