

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

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

Victoria M. v. Bisignano, No. 2:25-cv-00291-EFS (E.D. Wash. Mar. 24, 2026) · No. 2:25-cv-00291-EFS ·
Decided March 24, 2026

SUMMARY

The United States District Court for the Eastern District of Washington reverses the Administrative Law Judge’s denial of Social Security disability benefits to Plaintiff Victoria M. The court finds consequential errors in the evaluation of treating psychologist Jessica Long’s opinions and in the development of the medical record, including missing records from an intensive partial hospitalization program. The case is remanded for further proceedings, including additional record development and evaluation of Plaintiff’s physical limitations.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	Edward F. Shea
JURISDICTION	United States District Court for the Eastern District of Washington
DECIDED	March 24, 2026
DOCKET	2:25-cv-00291-EFS
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of an Administrative Law Judge's denial of disability insurance benefits. The court reversed the ALJ's nondisability decision and remanded for further proceedings.
STANDARD OF REVIEW	The court reviews the ALJ's decision for substantial evidence and legal error. Substantial evidence is more than a mere scintilla but less than a preponderance and is evidence that a reasonable mind might accept as adequate to support a conclusion. The court considers the entire record, including evidence supporting and detracting from the Commissioner's conclusion, and may not reverse for harmless error that is inconsequential to the ultimate nondisability determination.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order

PARTIES

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

TOPICS

judicial review of agency action

administrative law

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PRACTICE AREAS

administrative law

social security disability

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of treating psychologist Jessica Long's medical opinions under 20 C.F.R. § 404.1520c.
2. Whether the ALJ failed to develop the administrative record by not obtaining known treatment and progress records from Plaintiff's partial hospitalization program.
3. Whether the ALJ's residual functional capacity and step-five findings could stand when they were based on an inadequately developed record.
4. Whether the case should be remanded for further proceedings or an immediate award of benefits.

HOLDINGS

1. The ALJ did not adequately evaluate Dr. Long's opinions because the ALJ failed to meaningfully address the opinions' detailed narrative support and identified no specific treatment evidence inconsistent with them.
2. The ALJ erred by failing to obtain known treatment and progress records from Plaintiff's intensive partial hospitalization program and then relying on the resulting incomplete record to discount supportive medical opinion evidence.
3. The RFC and step-five findings could not be upheld because further development of the record and proper consideration of the medical evidence were required before those findings could be made.

KEY QUOTATIONS

"The ALJ always has a special duty to fully and fairly develop the record" (Analysis § III.A.4)

"The ALJ's misunderstanding as to the context of Plaintiff's release from treatment was consequential."
(Analysis § III.A.4)

"The ALJ's nondisability decision is REVERSED, and this matter is REMANDED to the Commissioner of Social Security for further proceedings pursuant to sentence four of 42 U.S.C. § 405(g)." (Conclusion § IV)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning February 26, 2021, based on endometriosis, pelvic floor dysfunction, migraines, PTSD, major depressive disorder, anxiety, and related physical and mental symptoms. She received frequent therapy and psychiatric treatment and participated in an intensive partial hospitalization program five days per week for approximately ten months beginning in February 2021. The administrative record contained only summaries or an abstract of that program rather than the underlying treatment and progress notes. Treating psychologist Jessica Long opined that Plaintiff had marked mental limitations, would be off task for more than 20 percent of the workday, and would miss work or be unable to complete an eight-hour day four or more days per month.

PROCEDURAL HISTORY

Plaintiff applied for Title II disability insurance benefits, but the claim was denied initially and on reconsideration. Following a July 2024 hearing, the ALJ denied benefits, finding that Plaintiff could perform other work existing in significant numbers in the national economy. The Appeals Council denied review on May 28, 2025, later granted an extension, and Plaintiff timely filed this action. The district court reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must obtain the full medical and progress records from Plaintiff's partial hospitalization program; properly consider the medical opinion evidence and testimony; schedule a consultative examination concerning Plaintiff's physical impairments or obtain medical-expert testimony if necessary; formulate an RFC based on the developed record; and make findings at each step of the five-step sequential evaluation process, including new step-five findings.

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158-1159 (9th Cir. 2012)
- Molina v. Astrue, 674 F.3d 1104, 1115 (9th Cir. 2012), superseded on other grounds by 20 C.F.R. § 404.1520(a)
- Sandgathe v. Chater, 108 F.3d 978, 980 (9th Cir. 1997)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035 (9th Cir. 2007)
- Black v. Apfel, 143 F.3d 383, 386 (8th Cir. 1998)
- Woods v. Kijakazi, 32 F.4th 785, 792 (9th Cir. 2022)
- Burrell v. Colvin, 775 F.3d 1133, 1138 (9th Cir. 2014)
- Nguyen v. Chater, 100 F.3d 1462, 1467 (9th Cir. 1996)
- Embrey v. Bowen, 849 F.2d 418, 421-422 (9th Cir. 1988)
- Blakes v. Barnhart, 331 F.3d 565, 569 (7th Cir. 2003)
- Kilpatrick v. Kijakazi, 35 F.4th 1187, 1193 (9th Cir. 2022)

- Ghanim, 763 F.3d at 1164
- Garcia v. Commissioner of Social Security, 768 F.3d 925, 930 (9th Cir. 2014)
- Vincent v. Heckler, 739 F.2d 1393, 1394-1395 (9th Cir. 1984)
- Celaya v. Halter, 332 F.3d 1177, 1183-1184 (9th Cir. 2003)
- Sprague v. Bowen, 812 F.2d 1226, 1232 (9th Cir. 1987)
- Stone v. Heckler, 761 F.2d 530 (9th Cir. 1985)
- Leon v. Berryhill, 880 F.3d 1041, 1045 (9th Cir. 2018)
- Benecke, 379 F.3d at 595
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1099 (9th Cir. 2014)

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