

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Vilma R. v. Frank Bisignano, Commissioner of Social Security

Vilma R. · No. 3:24CV1989(AWT) · Decided January 6, 2026

SUMMARY

The United States District Court for the District of Connecticut reviews Vilma R.’s challenge to the Commissioner of Social Security’s denial of supplemental security income benefits. The court concludes that the Administrative Law Judge applied the correct legal standards and that the decision was supported by substantial evidence, including the evaluation of the claimant’s impairments, medical opinions, residual functional capacity, and step-five findings. The court therefore affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Alvin W. Thompson
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	January 6, 2026
DOCKET	3:24CV1989(AWT)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner of Social Security's denial of her application for supplemental security income. Plaintiff moved to reverse the Commissioner's decision, and the Commissioner moved for an order affirming it.
STANDARD OF REVIEW	The court reviewed whether the Commissioner applied the correct legal principles and whether the decision was supported by substantial evidence. The court could not conduct a de novo disability determination and was required to affirm factual findings supported by substantial evidence absent legal error.
PRECEDENTIAL VALUE	unpublished district-court opinion; precedential status not stated
PARTIES	Vilma R. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ failed to consider all of plaintiff's medically determinable impairments or improperly found migraines, left epicondylitis, and fecal incontinence nonsevere at step two.
2. Whether the ALJ properly evaluated plaintiff's spinal impairment and adequately explained the step-three listings determination.
3. Whether the ALJ properly evaluated the persuasiveness of treating-source, physical-therapist, and state-agency medical and psychological opinions under 20 C.F.R. § 416.920c.
4. Whether the ALJ's residual functional capacity finding was supported by substantial evidence.
5. Whether the ALJ satisfied the step-five burden by relying on vocational-expert testimony identifying jobs plaintiff could perform.

HOLDINGS

1. The ALJ did not err by declining to identify certain alleged impairments as severe or by finding migraines, left epicondylitis, and fecal incontinence nonsevere because plaintiff did not show that those impairments significantly limited basic work activities for the required continuous twelve-month period.
2. The ALJ did not err in evaluating plaintiff's spinal impairment or in determining that her impairments did not meet or medically equal Listings 1.15 or 1.16.
3. The ALJ properly evaluated the medical and psychological opinions by considering their supportability and consistency and reasonably found the extreme restrictions offered by Dr. Kimmel and physical therapist Carroll unpersuasive while finding the state-agency opinions generally persuasive.
4. The ALJ's residual functional capacity finding was supported by substantial evidence.
5. The ALJ satisfied the step-five burden because the hypothetical posed to the vocational expert mirrored the RFC, the vocational expert identified occupations plaintiff could perform, and plaintiff failed to establish a conflict between the testimony and the Dictionary of Occupational Titles.

KEY QUOTATIONS

"The court may not make a de novo determination of whether a plaintiff is disabled in reviewing a denial of disability benefits." (R. 948)

"Absent legal error, the court may not set aside the decision of the Commissioner if it is supported by substantial evidence." (R. 948)

FACTUAL BACKGROUND

Plaintiff alleged disability from multiple physical and mental impairments, including fecal incontinence, migraines, left epicondylitis, spinal impairment, HIV, vascular conditions, pulmonary problems, gastrointestinal symptoms, anxiety, and depression. During the relevant period from November 30, 2022, through January 24, 2024, medical records showed generally normal gait, strength, coordination, range of motion, mental-status findings, and improvement or control of several conditions with treatment. Although plaintiff's spinal imaging worsened in September 2023 and she underwent lumbar fusion in January 2024, the court concluded that the evidence did not establish a qualifying twelve-month period of disabling limitation.

PROCEDURAL HISTORY

The Commissioner denied plaintiff's Title XVI supplemental-security-income application in a January 24, 2024 decision. The administrative law judge found that plaintiff was not disabled and retained the residual functional capacity for a restricted range of light work, including the ability to perform identified occupations. The district court denied plaintiff's motion to reverse, granted the Commissioner's motion to affirm, directed entry of judgment, and closed the case.

DISPOSITION

affirmed

CASES CITED

- Zambrana v. Califano, 651 F.2d 842, 844 (2d Cir. 1981)
- Wagner v. Secretary of Health & Human Services, 906 F.2d 856, 860 (2d Cir. 1990)
- Johnson v. Bowen, 817 F.2d 983, 985 (2d Cir. 1987)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Berry v. Schweiker, 675 F.2d 464, 467-68 (2d Cir. 1982)
- Schauer v. Schweiker, 675 F.2d 55, 57 (2d Cir. 1982)
- Gray v. Astrue, 2007 U.S. Dist. LEXIS 73435, at *12, 2007 WL 2874049 (S.D.N.Y. Oct. 3, 2007)
- Orton v. Astrue, 2013 WL 3328025, at *7 (N.D.N.Y. July 2, 2013)
- Wilkinson on Behalf of Wilkinson v. Bowen, 847 F.2d 660, 663 (11th Cir. 1987)
- Barnhart v. Walton, 535 U.S. 212, 218-19 (2002)
- April W. v. Kijakazi, 2024 WL 1327313, at *12 (D. Conn. Mar. 28, 2024)
- Pratt v. Astrue, 2011 WL 322823, at *3 (D. Conn. Jan. 28, 2011)
- Rosa v. Callahan, 168 F.3d 72, 79 n.5 (2d Cir. 1999)
- Perez v. Chater, 77 F.3d 41, 48 (2d Cir. 1996)
- Santiago v. Astrue, 2011 WL 4460206, at *2 (D. Conn. Sept. 27, 2011)
- Tankisi v. Commissioner of Social Security, 521 F. App'x 29, 34 (2d Cir. 2013)
- Gibbons v. Commissioner of Social Security, 2023 WL 3830774 (2d Cir. June 6, 2023)
- Spottswood v. Kijakazi, No. 23-54-cv, 2024 WL 89635, at *3 (2d Cir. Jan. 9, 2024)

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