

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Charlene Hoffman v. Frank Bisignano, Commissioner of Social
Security

Civil No. 4:24-CV-507 (M.D. Pa. Mar. 13, 2026) · No. Civil No. 4:24-CV-507 · Decided March 13, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviews the denial of Charlene Hoffman's applications for Social Security disability insurance and supplemental security income benefits. The court concludes that the Administrative Law Judge improperly evaluated the record by selectively emphasizing periods of improvement and noncompliance while failing to meaningfully address Hoffman's suicide attempt, psychiatric hospitalization, agoraphobia, and other severe mental-health symptoms. The case is remanded to the Commissioner for further proceedings.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Martin C. Carlson
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 13, 2026
DOCKET	Civil No. 4:24-CV-507
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Hoffman sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of her applications for disability insurance benefits and supplemental security income. The court found that the Administrative Law Judge failed to properly evaluate material evidence concerning Hoffman's suicide attempt, cyclical mental-health symptoms, subjective complaints, and treatment noncompliance, and remanded for further administrative proceedings.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and reviews legal issues de novo. Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion, but an ALJ must adequately explain the basis for the decision, consider all relevant evidence, and resolve material evidentiary conflicts.

PRECEDENTIAL VALUE	unpublished
PARTIES	Charlene Hoffman v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action agency adjudication administrative law

PRACTICE AREAS

Social Security disability administrative law judicial review of agency action
mental-health impairment evaluation

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence and adequately explained.
2. Whether the ALJ improperly evaluated Hoffman's subjective symptoms by selectively citing evidence of improvement while ignoring evidence of severe, cyclical mental-health symptoms.
3. Whether the ALJ erred by failing to consider Hoffman's February 2018 overdose and suicide attempt when assessing the severity and functional effects of her mental impairments.
4. Whether the ALJ improperly treated treatment noncompliance as evidence undermining Hoffman's symptoms without considering whether her agoraphobia and panic disorder explained her failure to attend treatment.

HOLDINGS

1. An ALJ must consider all relevant evidence bearing on a claimant's residual functional capacity, including material evidence of suicidal behavior and severe mental-health symptoms, and must provide a clear and satisfactory explanation for rejecting or discounting that evidence. The ALJ's failure to address Hoffman's February 2018 overdose and suicide attempt required remand.
2. An ALJ may not cherry-pick isolated periods of improvement or normal mental-status findings while ignoring contrary evidence of severe and recurring symptoms when evaluating a claimant with cyclical mental impairments.
3. Before relying on a claimant's failure to seek or pursue regular treatment to discount reported symptoms, the ALJ must consider explanations in the record, including whether the claimant's mental impairment itself prevented treatment compliance.

KEY QUOTATIONS

“The selective citation of treatment notes is particularly problematic in the context of mental impairments such as depression and anxiety, which are cyclical in nature.” (at 35-36)

“Cycles of improvement and debilitating symptoms are a common occurrence, and in such circumstances it is error for an ALJ to pick out a few isolated instances of improvement over a period of months or years and to treat them as a basis for concluding a claimant is capable of working.” (at 36)

“Here, the plaintiff’s well-documented social anxiety, panic attacks, and documented agoraphobia, which the ALJ failed to adequately acknowledge or assess, explain her irregular medical visits.” (at 38)

FACTUAL BACKGROUND

Hoffman alleged disability primarily from severe anxiety, panic attacks, depression, post-traumatic stress disorder, and agoraphobia. Shortly after the alleged onset date, she overdosed on Klonopin, was psychiatrically hospitalized, and underwent substance-abuse and mental-health treatment. Her symptoms waxed and waned, with periods of improvement and work activity alternating with periods of severe panic, agoraphobia, suicidal thoughts, inability to leave home, and debilitating anxiety. The ALJ emphasized normal examinations, periods of stability, daily activities, and treatment noncompliance but failed to address the overdose and substantial evidence of severe exacerbations.

PROCEDURAL HISTORY

Hoffman filed applications for disability insurance benefits and supplemental security income alleging disability beginning January 31, 2018. After two administrative hearings, the ALJ denied benefits on February 15, 2023, finding that Hoffman could perform other work despite severe mental impairments. Hoffman appealed to the district court, which vacated the Commissioner's decision and remanded for a new administrative hearing.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Vacate the Commissioner's final decision and remand for a new administrative hearing and further consideration of the evidence, including Hoffman's suicide attempt, suicidal ideation, severe and cyclical mental-health symptoms, subjective complaints, treatment history, and the relationship between her symptoms and treatment noncompliance. The court did not direct a particular ultimate disability determination.

CASES CITED

- Stoltzfus v. Berryhill, No. CV 16-6308, 2019 WL 1981888, at *5 (E.D. Pa. May 1, 2019)
- Rivera v. Astrue, 9 F. Supp. 3d 495, 504 (E.D. Pa. 2014)
- Garrison v. Colvin, 759 F.3d 995, 1017 (9th Cir. 2014)
- Johnson v. Commissioner of Social Security, 529 F.3d 198, 200 (3d Cir. 2008)
- Ficca v. Astrue, 901 F. Supp. 2d 533, 536 (M.D. Pa. 2012)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Mason v. Shalala, 994 F.2d 1058, 1064, 1066 (3d Cir. 1993)

- *Consolo v. Federal Maritime Commission*, 383 U.S. 607, 620 (1966)
- *Leslie v. Barnhart*, 304 F. Supp. 2d 623, 627 (M.D. Pa. 2003)
- *Biestek v. Berryhill*, 139 S. Ct. 1148, 1154 (2019)
- *Arnold v. Colvin*, No. 3:12-CV-02417, 2014 WL 940205, at *1 (M.D. Pa. Mar. 11, 2014)
- *Burton v. Schweiker*, 512 F. Supp. 913, 914 (W.D. Pa. 1981)
- *Wright v. Sullivan*, 900 F.2d 675, 678 (3d Cir. 1990)
- *Zirnsak v. Colvin*, 777 F.3d 607, 611 (3d Cir. 2014)
- *Rutherford v. Barnhart*, 399 F.3d 546, 552 (3d Cir. 2005)
- *Burnett v. Commissioner of Social Security Administration*, 220 F.3d 112, 119-21 (3d Cir. 2000)
- *Diaz v. Commissioner of Social Security*, 577 F.3d 500, 504 (3d Cir. 2009)
- *Jones v. Barnhart*, 364 F.3d 501, 505 & n.3 (3d Cir. 2004)
- *Hess v. Commissioner of Social Security*, 931 F.3d 198, 211-14 (3d Cir. 2019)
- *Biller v. Acting Commissioner of Social Security*, 962 F. Supp. 2d 761, 778-79 (W.D. Pa. 2013)
- *Gormont v. Astrue*, No. 11-2145, 2013 WL 791455, at *7 (M.D. Pa. Mar. 4, 2013)
- *Titterington v. Barnhart*, 174 F. App'x 6, 11 (3d Cir. 2006)
- *Cummings v. Colvin*, 129 F. Supp. 3d 209, 214-15 (W.D. Pa. 2015)
- *Burns v. Barnhart*, 312 F.3d 113, 129 (3d Cir. 2002)
- *Metzger v. Berryhill*, No. 3:16-CV-1929, 2017 WL 1483328, at *5 (M.D. Pa. Mar. 29, 2017)
- *Rathbun v. Berryhill*, No. 3:17-CV-00301, 2018 WL 1514383, at *6 (M.D. Pa. Mar. 12, 2018)
- *Schaudeck v. Commissioner of Social Security*, 181 F.3d 429, 433 (3d Cir. 1999)
- *Plummer v. Apfel*, 186 F.3d 422, 429 (3d Cir. 1999)
- *Wallace v. Secretary of Health & Human Services*, 722 F.2d 1150, 1154-55 (3d Cir. 1983)
- *Salazar v. Barnhart*, 468 F.3d 615, 622 (10th Cir. 2006)
- *Glaser v. Bisignano*, No. 4:23-CV-1922, 2025 WL 3124700, at *1 (M.D. Pa. Nov. 7, 2025)
- *Roat v. Barnhart*, 717 F. Supp. 2d 241, 267 (N.D.N.Y. 2010)
- *Lewis v. Colvin*, No. 14-14495-CIV, 2016 WL 4810585, at *3 (S.D. Fla. Mar. 4, 2016)
- *Maximiliano L. v. Kijakazi*, No. 3:21-CV-0083, 2022 WL 4550631, at *8 (D.N.J. Sept. 29, 2022)
- *Hennion v. Colvin*, No. 3:13-CV-00268, 2015 WL 877784, at *24 (M.D. Pa. Mar. 2, 2015)
- *Newell v. Commissioner of Social Security*, 347 F.3d 541, 547 (3d Cir. 2003)
- *Nguyen v. Chater*, 100 F.3d 1462, 1465 (9th Cir. 1996)
- *Pool v. Colvin*, No. 15-CV-02061-WHO, 2016 WL 4363405, at *2 (N.D. Cal. Aug. 16, 2016)
- *Burns v. Colvin*, 156 F. Supp. 3d 579, 598 (M.D. Pa. 2016)