

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Angela O. v. Frank Bisignano, Commissioner of Social Security

Civil No. TJS-24-3658 · No. Civil No. TJS-24-3658 · Decided April 27, 2026

SUMMARY

The United States District Court for the District of Maryland reviewed the denial of Angela O.'s claim for disability insurance benefits. The court held that the Administrative Law Judge inadequately explained the consistency analysis of a physical therapist's medical opinion, reversed the Commissioner's decision in part, and remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Timothy J. Sullivan
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 27, 2026
DOCKET	Civil No. TJS-24-3658
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying disability insurance benefits. The court reviewed the administrative record without a hearing and remanded under sentence four of § 405(g).
STANDARD OF REVIEW	The court must uphold the agency decision if it is supported by substantial evidence and the agency applied the proper legal standards.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Angela O. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- remedies
- civil procedure

PRACTICE AREAS

- Social Security disability benefits
- administrative law
- federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of Christopher Hoffman's medical opinion under 20 C.F.R. § 404.1520c.
2. Whether the court should address Angela O.'s alternative argument that the ALJ inadequately assessed her mental impairments under 20 C.F.R. § 404.1520a.

HOLDINGS

1. The ALJ's evaluation of Hoffman's opinion was inadequate because, although the ALJ addressed supportability and consistency in general terms, the ALJ did not explain how the opinion was inconsistent with the identified treating-source objective evidence. That unexplained consistency analysis frustrated meaningful judicial review and required remand.
2. The court declined to address the alternative argument concerning mental impairments and expressed no opinion on the ultimate issue of disability.

KEY QUOTATIONS

“The ALJ’s explanation of his consideration of the consistency factor, however, frustrates meaningful review.”

“It is not the Court’s role “to speculate as to how the ALJ applied the law to its findings or to hypothesize the ALJ’s justifications that would perhaps find support in the record.””

FACTUAL BACKGROUND

Angela O. alleged disability based on impairments including obesity, osteoarthritis, peripheral neuropathy, and lumbar degenerative disc disease. The ALJ found that she retained the residual functional capacity for a restricted range of light work and could perform past relevant work or other jobs existing in significant numbers in the national economy. After her date last insured, physical therapist Christopher Hoffman performed a functional capacities evaluation and opined that she had substantially greater functional limitations, including an inability to walk.

PROCEDURAL HISTORY

Angela O. applied for disability insurance benefits in May 2021, alleging disability beginning August 9, 2019. The Social Security Administration denied the claim initially and on reconsideration. After a September 15, 2023 hearing, the ALJ issued a November 20, 2023 decision finding that Angela O. was not disabled. The district court found that the ALJ inadequately explained the consistency analysis concerning a treating physical therapist's opinion, reversed the decision in part, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings consistent with the opinion, including a legally adequate analysis of the consistency of Christopher Hoffman's opinion with the objective evidence. The court did not direct a particular ultimate disability finding.

CASES CITED

- Mascio v. Colvin, 780 F.3d 632, 634 (4th Cir. 2015)
- Melkonyan v. Sullivan, 501 U.S. 89 (1991)
- Oakes v. Kijakazi, 70 F.4th 207, 212 (4th Cir. 2023)
- Wooldridge v. Bowen, 816 F.2d 157, 160 (4th Cir. 1987)
- Drumgold v. Commissioner of Social Security, 144 F.4th 596, 604-05 (4th Cir. 2025)
- Shelley C. v. Commissioner of Social Security Administration, 61 F.4th 341, 353 (4th Cir. 2023)
- Shane B. v. Bisignano, Civil No. 24-3607-DRM, 2026 WL 369392, at *4-5 (D. Md. Feb. 10, 2026)
- Fox v. Colvin, 632 F. App'x 750, 755 (4th Cir. 2015) (per curiam)
- Judy L. v. Bisignano, Civil No. TJS-25-1771, 2026 WL 948960, at *3-4 (D. Md. Apr. 8, 2026)