

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

Mylindsie A. v. Frank Bisignano, Commissioner of Social Security

Mylindsie A. · No. 1:25-CV-03140-RLP · Decided March 13, 2026

SUMMARY

The United States District Court for the Eastern District of Washington reversed the Commissioner of Social Security’s denial of supplemental security income and remanded the case for further administrative proceedings. The court held that outstanding issues remained concerning the evaluation of medical opinion evidence, substance-abuse materiality, symptom statements, daily activities, and vocational-expert testimony. The court declined to remand for an immediate award of benefits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	Rebecca L. Pennell
JURISDICTION	United States District Court for the Eastern District of Washington
DECIDED	March 13, 2026
DOCKET	1:25-CV-03140-RLP
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from the Commissioner of Social Security's final decision denying supplemental security income under Title XVI of the Social Security Act.
STANDARD OF REVIEW	The court reviews the Commissioner's decision under 42 U.S.C. § 405(g) and may disturb it only if it is unsupported by substantial evidence or based on legal error. Harmless error does not warrant reversal; an error is harmless when inconsequential to the ultimate nondisability determination.
PRECEDENTIAL VALUE	unknown
PARTIES	Mylindsie A. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- remedies

PRACTICE AREAS

Social Security

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ's evaluation of the psychological opinion evidence and Plaintiff's symptom statements was reversible error.
2. Whether the case should be remanded for an immediate award of benefits under the credit-as-true rule or for further administrative proceedings.
3. What matters the ALJ must address on remand, including drug and alcohol addiction materiality, conflicts in the medical opinions, symptom waxing and waning, daily activities, and vocational-expert testimony.

HOLDINGS

1. The ALJ's decision was not supported by substantial evidence because the ALJ committed reversible error, including in evaluating Dr. Genthe's opinion. Reversal and remand under sentence four of 42 U.S.C. § 405(g) were therefore warranted.
2. Remand for an immediate award of benefits was inappropriate because outstanding issues and evidentiary conflicts remained for the ALJ to resolve.
3. On remand, if Plaintiff is found disabled, the ALJ must determine whether drug or alcohol addiction is a contributing factor material to the disability determination.
4. The ALJ must reconsider Dr. Genthe's opinion and the evidence, develop the record as needed, conduct a new sequential evaluation, and issue a new decision consistent with the order.

KEY QUOTATIONS

“the proper course, except in rare circumstances, is to remand to the agency for additional investigation or explanation.” (Analysis at 1)

“Under the credit-as-true rule, the Court may order an immediate award of benefits only if three conditions are met” (Analysis at 2)

FACTUAL BACKGROUND

Mylindsie A. applied for supplemental security income, alleging inability to work because of anxiety, depression, PTSD, and a learning disability. The ALJ found severe impairments including depression, bipolar disorder, anxiety, PTSD, drug abuse, and borderline personality disorder, but determined that Plaintiff retained the capacity for unskilled work with specified nonexertional limitations. The ALJ found at step five that Plaintiff could perform jobs existing in significant numbers in the national economy, including laundry worker, routing clerk, and sorter.

PROCEDURAL HISTORY

The ALJ denied Plaintiff's SSI claim on October 2, 2024, after Plaintiff failed to appear at the hearing but her attorney appeared and a vocational expert testified. The Appeals Council denied review on July 1, 2025. The parties agreed that the ALJ committed reversible error but disputed whether the case should be remanded for further proceedings or for an immediate award of benefits.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ shall reconsider Dr. Genthe's opinion, reconsider the evidence, develop the record as needed, conduct a new sequential evaluation, and issue a new decision consistent with the order. The ALJ shall address the potential materiality of drug or alcohol addiction if disability is otherwise established, resolve conflicts in the medical opinions, reassess Plaintiff's symptom statements and daily activities including symptom waxing and waning, and address the vocational-expert testimony, obtaining supplemental vocational-expert testimony if necessary.

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158
- Molina v. Astrue, 674 F.3d 1104, 1115
- Shinseki v. Sanders, 556 U.S. 396, 409-10, 129 S. Ct. 1696
- Tackett v. Apfel, 180 F.3d 1094, 1098
- Beltran v. Astrue, 700 F.3d 386, 389
- Garrison v. Colvin, 759 F.3d 995, 1019
- Dominguez v. Colvin, 808 F.3d 403, 407
- Florida Power & Light Co. v. Lorion, 470 U.S. 729, 744
- Treichler v. Comm'r of Soc. Sec. Admin., 775 F.3d 1090, 1099-1100
- Leon v. Berryhill, 880 F.3d 1041, 1045
- Bustamante v. Massanari, 262 F.3d 949, 954
- Garrison v. Colvin, 759 F.3d 995, 1017
- Wellington v. Berryhill, 878 F.3d 867, 876