

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, NORTHERN DIVISION

Joshua McGowan v. Frank Bisignano, Commissioner, Social Security
Administration

No. 3:25-cv-00082 PSH · No. No. 3:25-cv-00082 PSH · Decided February 4, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas affirmed the Commissioner of the Social Security Administration’s denial of Joshua McGowan’s claim for Supplemental Security Income. The court held that substantial evidence supported the Administrative Law Judge’s evaluation of the medical opinions, school records, testimony, and residual functional capacity assessment, and dismissed the complaint with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Northern Division
DECIDED	February 4, 2026
DOCKET	No. 3:25-cv-00082 PSH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of McGowan's application for Supplemental Security Income.
STANDARD OF REVIEW	The court reviewed whether substantial evidence supported the Commissioner's decision and whether the ALJ applied the proper legal standards. The court may not reweigh the evidence or conduct de novo review, and must affirm when the evidence permits inconsistent positions and one position represents the agency's findings.
PRECEDENTIAL VALUE	unknown
PARTIES	Joshua McGowan v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

administrative law

agency adjudication

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the opinions of Samuel B. Hester, Ph.D., and APRN Bethany Collins.
2. Whether the ALJ properly considered McGowan's school records and the testimony of McGowan and his mother.
3. Whether substantial evidence supported the ALJ's residual functional capacity assessment and finding that McGowan was not disabled.

HOLDINGS

1. The ALJ properly found Hester's opinion unpersuasive because it was insufficiently supported and inconsistent with the record as a whole, and the ALJ complied with the applicable regulations by considering supportability and consistency.
2. The ALJ did not err in considering Collins's report because the report generally aligned with the RFC determination, and a diagnosis alone does not establish a claimant's functional capacity.
3. The ALJ did not err in considering McGowan's school records or the testimony of McGowan and his mother; the evidence substantially supported the assessed nonexertional limitations.

KEY QUOTATIONS

“Instead, it “is the ALJ’s responsibility to determine a claimant’s RFC based on all relevant evidence, including medical records, observations of treating physicians and others, and claimant’s own descriptions of his limitations.”” (at 10)

“The court, however, does not “reweigh the evidence presented to the ALJ,”” (at 11)

“Instead, if, after reviewing the evidence, the court finds it “possible to draw two inconsistent positions from the evidence and one of those positions represents the agency's findings, [the court] must affirm the [Commissioner's] decision.”” (at 11)

“The test is whether substantial evidence supports the ALJ’s decision.” (at 12)

FACTUAL BACKGROUND

McGowan, a 21-year-old high school graduate with a history of autism-spectrum disorder and anxiety, sought Supplemental Security Income. He had received special-education services and school accommodations, had no relevant work experience, and described difficulties with social interaction, anxiety, and independent living, although the record also showed regular interaction with family and friends, basic self-care, household activities, and generally normal mental-status findings. The ALJ found severe autistic-spectrum and anxiety disorders,

assessed a residual functional capacity for all exertional levels with limitations to simple work and limited workplace interaction and change, and relied on vocational-expert testimony identifying available jobs.

PROCEDURAL HISTORY

McGowan applied for Supplemental Security Income on April 17, 2023. Following an administrative hearing on May 22, 2024, the ALJ issued a decision on June 18, 2024, finding that McGowan was not disabled and retained the residual functional capacity to perform work at all exertional levels subject to nonexertional limitations. McGowan sought judicial review, challenging the ALJ's evaluation of medical opinions, school records, and testimony. The district court affirmed the Commissioner's decision and dismissed the complaint with prejudice.

DISPOSITION

dismissed

CASES CITED

- Pearsall v. Massanari, 274 F.3d 1211, 1217 (8th Cir. 2001)
- Sobania v. Secretary of Health & Human Services, 879 F.2d 441, 444 (8th Cir. 1989)
- Steadman v. S.E.C., 450 U.S. 91, 99, 101 S. Ct. 999, 1006, 67 L. Ed. 2d 69 (1981)
- Baldwin v. Barnhart, 349 F.3d 549, 555 (8th Cir. 2003)
- Bates v. Chater, 54 F.3d 529, 532 (8th Cir. 1995)
- Roe v. Chater, 92 F.3d 672, 675 (8th Cir. 1996)
- Naber v. Shalala, 22 F.3d 186, 188 (8th Cir. 1994)
- Robinson v. Sullivan, 956 F.2d 836, 838 (8th Cir. 1992)
- Cruse v. Bowen, 867 F.2d 1183, 1184 (8th Cir. 1989)
- Culbertson v. Shalala, 30 F.3d 934, 939 (8th Cir. 1994)
- Browning v. Sullivan, 958 F.2d 817, 822 (8th Cir. 1992)
- Krogmeier v. Barnhart, 294 F.3d 1019, 1022 (8th Cir. 2002)
- Woolf v. Shalala, 3 F.3d 1210, 1213 (8th Cir. 1993)
- Goff v. Barnhart, 421 F.3d 785, 789 (8th Cir. 2005)
- Page v. Astrue, 484 F.3d 1040, 1042-43 (8th Cir. 2007)
- Kelley v. Barnhart, 372 F.3d 958, 961 (8th Cir. 2004)
- Travis v. Astrue, 477 F.3d 1037, 1040 (8th Cir. 2007)
- Cox v. Barnhart, 471 F.3d 902, 906 (8th Cir. 2006)
- Rittenhouse v. Astrue, 767 F. Supp. 2d 985, 1000-01 (N.D. Iowa 2011)
- Byes v. Astrue, 687 F.3d 913, 915 (8th Cir. 2012)