

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

Kiarra F. v. Frank Bisignano, Commissioner of Social Security

Kiarra F. · No. 1:25-CV-03122-RLP · Decided March 5, 2026

SUMMARY

The United States District Court for the Eastern District of Washington reviewed an Administrative Law Judge’s denial of supplemental security income under Title XVI of the Social Security Act. The court held that the ALJ inadequately evaluated the claimant’s symptom testimony, including her daily activities and treatment compliance, and therefore reversed and remanded for further administrative proceedings. The court also directed the ALJ to reevaluate the medical opinions on remand.

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 5, 2026
DOCKET	1:25-CV-03122-RLP
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of 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 to determine whether it is supported by substantial evidence and free of legal error. The court must uphold findings susceptible to more than one rational interpretation if supported by reasonable inferences from the record, and may not reverse for harmless error.
PRECEDENTIAL VALUE	unpublished district court opinion; limited precedential value
PARTIES	Kiarra F. 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

QUESTIONS PRESENTED

1. Whether the ALJ was required to perform a marijuana-specific second five-step analysis before considering marijuana use in evaluating the claim.
2. Whether the ALJ provided legally sufficient reasons for rejecting Kiarra F.'s testimony concerning the intensity, persistence, and limiting effects of her symptoms.
3. Whether the ALJ properly evaluated the supportability and consistency of the medical opinions and prior administrative medical findings under 20 C.F.R. §§ 404.1520c and 416.920c.

HOLDINGS

1. Because Kiarra F. never established disability under the initial five-step inquiry, the ALJ was not required to perform a second five-step analysis addressing whether she would remain disabled absent marijuana use.
2. The ALJ did not provide a sufficient reason for rejecting Kiarra F.'s symptom testimony based on her daily activities because the ALJ failed to address the qualifying evidence showing that her impairments affected those activities.
3. The ALJ could not reject Kiarra F.'s symptom testimony based on improvement with treatment or failure to follow prescribed treatment without considering possible reasons for noncompliance.
4. The ALJ's discussion of the objective medical evidence was reasonable, but the decision could not reject Kiarra F.'s symptom testimony solely because the degree of alleged symptoms was not supported by objective medical evidence.
5. On remand, the ALJ must reevaluate all medical opinions and prior administrative medical findings and explain their supportability and consistency.

KEY QUOTATIONS

“only if it is not supported by substantial evidence or is based on legal error.” (at 2)

“An ALJ may not reject symptom testimony due to failure to follow prescribed treatment without also considering possible reasons for non-compliance with treatment.” (at 9)

“The clear and convincing [evidence] standard is the most demanding required in Social Security cases.” (at 10)

FACTUAL BACKGROUND

Kiarra F. was born in 1999, had a high school education, and had no past relevant work. She alleged disability beginning January 1, 2020, based principally on PTSD, anxiety, depression, ADHD, emotional and social behavioral disorder, and a learning disability. The ALJ found severe PTSD, major depressive disorder, cannabis dependence, and ADHD, assessed a residual functional capacity for work with non-exertional limitations, and

found that she could perform janitorial, laundry-worker, and industrial-cleaner jobs. The district court concluded that the ALJ inadequately evaluated her symptom testimony and therefore could not sustain the denial of benefits.

PROCEDURAL HISTORY

Kiarra F. applied for supplemental security income, alleging disability based on several mental impairments. The application was denied initially and on reconsideration; following a telephonic hearing, the ALJ issued an unfavorable decision on June 14, 2024. The Appeals Council denied review, and Kiarra F. appealed to the district court, which reversed and remanded for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Conduct further administrative proceedings consistent with the opinion, including reconsideration of Kiarra F.'s symptom testimony, reevaluation of all medical opinions and prior administrative medical findings with consideration of supportability and consistency, and a new sequential evaluation. Judgment shall be entered for the plaintiff and the file closed.

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158 (9th Cir. 2012)
- Molina v. Astrue, 674 F.3d 1104, 1111, 1115 (9th Cir. 2012)
- Shinseki v. Sanders, 556 U.S. 396, 409-10, 129 S. Ct. 1696 (2009)
- Tackett v. Apfel, 180 F.3d 1094, 1098 (9th Cir. 1999)
- Beltran v. Astrue, 700 F.3d 386, 389 (9th Cir. 2012)
- Bustamante v. Massanari, 262 F.3d 949, 954-55 (9th Cir. 2001)
- Ghanim v. Colvin, 763 F.3d 1154, 1163 (9th Cir. 2014)
- Garrison v. Colvin, 759 F.3d 995, 1015 (9th Cir. 2014)
- Moore v. Comm'r of Soc. Sec. Admin., 278 F.3d 920, 924 (9th Cir. 2002)
- Bunnell v. Sullivan, 947 F.2d 341, 346-47 (9th Cir. 1991)

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