

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, FORT WAYNE DIVISION

Albert H. v. Frank Bisignano, Commissioner of Social Security

Albert H. v. Bisignano, No. 1:24-CV-280-SJF (N.D. Ind. Mar. 18, 2026) · No. 1:24-CV-280-SJF · Decided
March 18, 2026

SUMMARY

The United States District Court for the Northern District of Indiana reviewed the denial of Albert H.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court held that the administrative law judge failed to adequately explain the rejection of examining provider Rana Stoops's opinion concerning the claimant's limitations in workplace interactions and improperly relied on certain evidence and lack of treatment. The court reversed and remanded the Commissioner's decision for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Scott J. Frankel
JURISDICTION	United States District Court for the Northern District of Indiana, Fort Wayne Division
DECIDED	March 18, 2026
DOCKET	1:24-CV-280-SJF
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying applications for Disability Insurance Benefits and Supplemental Security Income; the court reviewed the ALJ's evaluation of mental-impairment medical opinions and residual functional capacity.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence. Substantial evidence is more than a scintilla but may be less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate. The court reviews the entire administrative record but may not reweigh evidence, resolve evidentiary conflicts, decide credibility questions, or substitute its judgment for the ALJ's.

	The ALJ must adequately articulate the reasoning and build an accurate and logical bridge from the evidence to the conclusions.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	Albert H. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the rejection of consultative examiner Rana Stoops's opinion that Albert H. was limited to brief, superficial workplace interactions.
2. Whether the ALJ built an accurate and logical bridge between the medical evidence and an RFC permitting frequent interactions with coworkers and supervisors.
3. Whether the ALJ improperly relied on Albert H.'s limited treatment history without adequately exploring his explanation that loss of health insurance caused the lapse in treatment.

HOLDINGS

1. The ALJ did not provide a sufficient explanation, supported by substantial evidence, for rejecting or discounting Stoops's opinion that Albert H. should be limited to brief, superficial workplace interactions.
2. The ALJ failed to build the required logical bridge between the evidence and the RFC allowing frequent interactions with coworkers and supervisors.
3. The ALJ improperly drew a negative inference from Albert H.'s limited mental-health treatment without exploring his explanation that treatment lapsed because he lost health insurance.

KEY QUOTATIONS

“In doing so, the ALJ failed to build a logical bridge that supported greater social interaction than that opined by Ms. Stoops.” (Discussion § III.A)

“Accordingly, the ALJ’s evaluation is not supported by substantial evidence.” (Discussion § III.A)

“For these reasons, the Commissioner’s decision is REVERSED and REMANDED for further administrative proceedings consistent with this opinion.” (Conclusion § IV)

FACTUAL BACKGROUND

Albert H. alleged disability based on multiple physical and mental impairments, including ADHD, bipolar disorder, and personality disorder. Consultative examiner Rana Stoops opined that he could understand and

remember simple instructions and perform work-like tasks, but should be limited to brief, superficial interactions and tolerate stress in an entry-level position. The ALJ rejected that opinion as unpersuasive and formulated an RFC allowing frequent interactions with coworkers and supervisors. The district court found that the ALJ failed to explain the discrepancy, improperly relied on an apparent reference to basketball, and drew a negative inference from limited mental-health treatment without adequately considering Albert H.'s explanation that he had lost health insurance.

PROCEDURAL HISTORY

Albert H. applied for DIB and SSI, alleging disability beginning March 21, 2022. His claims were denied initially and on reconsideration, and an ALJ denied them on December 22, 2023, after a November 2, 2023 hearing; the Appeals Council denied further review on May 16, 2024. He filed this action on July 11, 2024. The district court reversed and remanded the Commissioner's decision for further administrative proceedings because the ALJ failed to adequately explain the rejection of examining provider Rana Stoops's opinion concerning brief, superficial workplace interactions.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further administrative proceedings consistent with the opinion, including reevaluation of the ALJ's assessment of the mental-impairment medical opinions and RFC. On remand, the ALJ may also fully discuss the claimant's arguments concerning other medical opinions, administrative medical findings, and the availability of relevant work in the national economy.

CASES CITED

- Fast v. Barnhart, 397 F.3d 468, 470 (7th Cir. 2005)
- Clifford v. Apfel, 227 F.3d 863, 868 (7th Cir. 2000)
- Elder v. Astrue, 529 F.3d 408, 413 (7th Cir. 2008)
- Roddy v. Astrue, 705 F.3d 631, 636 (7th Cir. 2013)
- Simila v. Astrue, 573 F.3d 503, 513 (7th Cir. 2009)
- Skinner v. Astrue, 478 F.3d 836, 841 (7th Cir. 2007)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Summers v. Berryhill, 864 F.3d 523, 526 (7th Cir. 2017)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Young v. Barnhart, 362 F.3d 995, 1001 (7th Cir. 2004)
- Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Scott v. Barnhart, 297 F.3d 589, 595 (7th Cir. 2002)
- Craft v. Astrue, 539 F.3d 668, 673 (7th Cir. 2008)
- Moore v. Colvin, 743 F.3d 1118, 1123 (7th Cir. 2014)

- Indoranto v. Barnhart, 374 F.3d 470, 474 (7th Cir. 2004)
- Briscoe ex rel. Taylor v. Barnhart, 425 F.3d 345, 355 (7th Cir. 2005)
- Liskovitz v. Astrue, 559 F.3d 736, 742-43 (7th Cir. 2009)
- Beardsley v. Colvin, 758 F.3d 834, 839 (7th Cir. 2014)
- Gudgel v. Barnhart, 345 F.3d 467, 470 (7th Cir. 2003)
- Knight v. Chater, 55 F.3d 309, 313-14 (7th Cir. 1995)
- Cote v. Colvin, 2017 WL 448617, at *21-23 (W.D. Wis. Feb. 2, 2017)
- Wartak v. Colvin, 2016 WL 880945, at *7 (N.D. Ind. Mar. 8, 2016)
- George S. v. Kijakazi, 2023 WL 3436712, at *6-*7 (N.D. Ind. Apr. 21, 2025)
- Price v. Colvin, 794 F.3d 836, 840 (7th Cir. 2015)
- Hughes v. Astrue, 705 F.3d 276, 278-79 (7th Cir. 2013)
- Garcia v. Colvin, 741 F.3d 758, 762-63 (7th Cir. 2014)
- Shauger v. Astrue, 675 F.3d 690, 696 (7th Cir. 2012)

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