

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Tiffany M. o/b/o M.M. v. Frank Bisignano, Commissioner of Social Security

Tiffany M. ex rel. M.M. · No. Case No. 1:22-cv-2807-MJS · Decided February 24, 2026

SUMMARY

The United States District Court for the District of Columbia reviews the denial of supplemental security income benefits for a minor child with multiple developmental, psychological, and physical impairments. The court concludes that the Administrative Law Judge inadequately explained the evidence supporting findings of less-than-marked limitations in several functional-equivalence domains, grants the plaintiff’s motion for reversal, denies the Commissioner’s motion for affirmance, and remands for further proceedings.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Matthew J. Sharbaugh
JURISDICTION	United States District Court for the District of Columbia
DECIDED	February 24, 2026
DOCKET	Case No. 1:22-cv-2807-MJS
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final denial of a minor child's application for supplemental security income benefits. Plaintiff moved for judgment of reversal, and the Commissioner cross-moved for judgment of affirmance.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and determines whether it is supported by substantial evidence. The court may not reweigh the evidence, but the ALJ must build an accurate and logical bridge from the evidence to the conclusions and may not wholly ignore evidence contrary to those conclusions.
PRECEDENTIAL VALUE	Published district court memorandum opinion
PARTIES	Tiffany M. o/b/o M.M. v. Frank Bisignano, Commissioner of Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ's finding that M.M. had a less-than-marked limitation in acquiring and using information was supported by substantial evidence and adequately explained.
2. Whether the ALJ's finding that M.M. had a less-than-marked limitation in attending and completing tasks was supported by substantial evidence and adequately explained.
3. Whether the ALJ's findings concerning interacting and relating with others and health and physical well-being were supported by substantial evidence.
4. Whether the proper remedy was remand for an award of benefits or remand for further administrative proceedings.

HOLDINGS

1. The ALJ did not adequately explain how the relevant evidence was weighed in finding that M.M. had a less-than-marked limitation in acquiring and using information; therefore, substantial evidence did not support the finding as articulated.
2. The ALJ did not adequately explain the finding of a less-than-marked limitation in attending and completing tasks, including because the decision did not address the possibility that M.M.'s ADHD-related ability to focus on enjoyable activities reflected hyperfocus rather than broadly adequate attention.
3. The ALJ's finding that M.M. had a less-than-marked limitation in interacting and relating with others was adequately explained and supported by substantial evidence.
4. The ALJ's finding that M.M. had a less-than-marked limitation in health and physical well-being was adequately explained and supported by substantial evidence.
5. Remand for further administrative proceedings, rather than remand with instructions to award benefits, was appropriate.

KEY QUOTATIONS

"This comes up short in building a "logical bridge from the evidence to [the] conclusion." (at 9)

"Although the Court can discern, at least in broad strokes, the categories of evidence the ALJ considered in evaluating this area of functioning, the ALJ did not explain how they weighed that evidence, why they credited certain evidence over other evidence, and so on." (at 9)

"In other words, the Court cannot tell whether the ALJ discounted the severity of any limitation in this domain based on MM's other referenced impairments, as Ms. M argues (see Pl.'s Mem. at 12), or whether the

ALJ appropriately considered “the interrelation between the domains” and MM as a “whole child,” as the Commissioner rejoins (see Def.’s Mem. at 20 n.1).” (at 12)

“As best the Court can discern, the ALJ seems to have simply credited MM’s ability to engage in and focus on certain enjoyable activities, i.e., video games and arts and crafts.” (at 15)

“Accordingly, the most appropriate path forward is a remand for further proceedings to allow the ALJ to reconsider the record in a manner consistent with this opinion.” (at 18)

FACTUAL BACKGROUND

M.M. is a minor child diagnosed with asthma, selective mutism, speech delay, ADHD, and specific learning disabilities in reading, mathematics, and written expression. M.M. received medical treatment, developmental evaluations, and individualized education plans providing specialized instruction, communication technology, and other supports. The ALJ found less-than-marked limitations in five functional domains and no limitation in moving about and manipulating objects, but the district court found inadequate explanation and treatment of evidence concerning acquiring and using information and attending and completing tasks.

PROCEDURAL HISTORY

An ALJ denied SSI benefits after applying the three-step childhood-disability framework and finding that M.M.’s impairments did not meet, medically equal, or functionally equal a listed impairment. The Appeals Council denied review, making the ALJ’s decision final. The district court granted Plaintiff’s motion for reversal, denied the Commissioner’s motion for affirmance, and remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Social Security Administration under sentence four of 42 U.S.C. § 405(g) for further proceedings consistent with the opinion. The ALJ must reconsider the record and adequately explain the weighing of relevant evidence, particularly in the domains of acquiring and using information and attending and completing tasks.

CASES CITED

- Sullivan v. Zebley, 493 U.S. 521, 525-26 (1990)
- Cox v. Kijakazi, 77 F.4th 983, 990 (D.C. Cir. 2023)
- Butler v. Barnhart, 353 F.3d 992, 999 (D.C. Cir. 2004)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Fla. Mun. Power Agency v. FERC, 315 F.3d 362, 365-66 (D.C. Cir. 2003)
- Cunningham v. Colvin, 46 F. Supp. 3d 26, 32 (D.D.C. 2014)
- Rossello ex rel. Rossello v. Astrue, 529 F.3d 1181, 1185 (D.C. Cir. 2008)

- *Pierce v. Underwood*, 487 U.S. 552, 565 (1988)
- *Lane-Rauth v. Barnhart*, 437 F. Supp. 2d 63, 67 (D.D.C. 2006)
- *Scott v. Barnhart*, 297 F.3d 589, 595 (7th Cir. 2002)
- *Bethel ex rel. C.B. v. Berryhill*, 2019 WL 12251881, at *9 (D.D.C. Aug. 29, 2019)
- *Blair ex rel. S.T. v. Kijakazi*, 2022 WL 17726857, at *4 (D.D.C. Dec. 14, 2022)
- *Ferguson v. Kijakazi*, 640 F. Supp. 3d 125, 133 (D.D.C. 2022)
- *Boyington ex rel. J.O.J.H. v. Colvin*, 48 F. Supp. 3d 527, 531 (W.D.N.Y. 2014)
- *Claudio ex rel. E.P.I.C. v. Commissioner of Social Security Administration*, 2022 WL 6255608, at *16 (N.D. Ohio Aug. 5, 2022)
- *Estep v. Commissioner of Social Security*, 2017 WL 4334195, at *5 (S.D. Ohio Sept. 30, 2017)
- *Musgraves ex rel. MMM v. Colvin*, 2013 WL 4455626, at *3 (W.D. Mo. Aug. 16, 2013)
- *Callaway v. Berryhill*, 292 F. Supp. 3d 289, 298 (D.D.C. 2018)
- *Perkins v. Berryhill*, 379 F. Supp. 3d 1, 7-8 (D.D.C. 2019)
- *Espinosa v. Colvin*, 953 F. Supp. 2d 25, 36 (D.D.C. 2013)
- *Tymeka J. ex rel. S.C. v. Kijakazi*, 2023 WL 4892885, at *10 (D.D.C. June 22, 2023)

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