

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Teagen B. v. Commissioner of Social Security

Teagen B. · No. 1:22-CV-00772 CDH · Decided March 30, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the denial of Teagen B.'s applications for disability insurance benefits and supplemental security income. The court held that the administrative law judge failed to adequately assess and articulate the persuasiveness of medical opinions under the applicable Social Security regulations, and remanded the matter for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Colleen D. Holland
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 30, 2026
DOCKET	1:22-CV-00772 CDH
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought 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 parties filed cross-motions for judgment on the pleadings.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's conclusions were supported by substantial evidence and based on the correct legal standard. Legal conclusions were reviewed without deference.
PRECEDENTIAL VALUE	Unknown; district court decision with no stated precedential status.

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication
- motion for judgment on the pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ complied with the Commissioner's regulations by articulating how persuasive he found the medical opinions of NP Daijha Fulgham and the co-authored opinion of NP Fulgham and MHC Chelsea St. Laurent.
2. Whether the ALJ's failure to explain the role of those opinions in the RFC assessment was harmless.
3. Whether remand for further administrative proceedings was required.

HOLDINGS

1. The ALJ failed to comply with the Commissioner's regulations because he did not clearly articulate how persuasive he found the functional portions of the opinions from NP Fulgham and the co-authored opinion from NP Fulgham and MHC St. Laurent.
2. The error was not harmless because the court could not determine from the decision whether the ALJ complied with the substance of the regulations or what role the opinions played in the RFC finding.

KEY QUOTATIONS

"An ALJ must articulate how he considered the medical opinions and how persuasive he finds all of the medical opinions." (Dkt. 6 at 29)

"In light of these errors and omissions, the Court is not assured that the ALJ complied with the substance of the Commissioner's regulations." (Dkt. 6 at 30)

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on bipolar disorder, generalized anxiety disorder, panic disorder, and cannabis use disorder. The ALJ found those conditions severe, determined that Plaintiff did not meet a Listing, assessed an RFC for all exertional levels with significant mental and social limitations, and found that she could not perform past relevant work but could perform jobs existing in significant numbers in the national economy. In assessing the RFC, the ALJ considered opinions from nurse practitioner Daijha Fulgham and mental health counselor Chelsea St. Laurent but did not clearly explain the persuasiveness of the functional limitations in those opinions.

PROCEDURAL HISTORY

Plaintiff filed applications for SSI and DIB alleging disability beginning July 1, 2019. The applications were denied initially and on reconsideration. Following a hearing, the ALJ issued an unfavorable decision on July 28, 2021, and the Appeals Council denied review on August 15, 2022. Plaintiff then commenced this action; the court denied the Commissioner's motion, granted Plaintiff's motion to the extent of remanding for further administrative proceedings, directed entry of judgment, and closed the case.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter was remanded for further administrative proceedings consistent with the decision, including proper assessment and articulation of the persuasiveness of the medical opinions under the Commissioner's regulations.

CASES CITED

- *Sczepanski v. Saul*, 946 F.3d 152, 156 (2d Cir. 2020)
- *Selian v. Astrue*, 708 F.3d 409, 418 (2d Cir. 2013)
- *Rosa v. Callahan*, 168 F.3d 72, 77 (2d Cir. 1999)
- *Schaal v. Apfel*, 134 F.3d 496, 501 (2d Cir. 1998)
- *Moran v. Astrue*, 569 F.3d 108, 112 (2d Cir. 2009)
- *Byam v. Barnhart*, 336 F.3d 172, 179 (2d Cir. 2003)
- *Matta v. Astrue*, 508 F. App'x 53, 56 (2d Cir. 2013)
- *Kimberly A. D. v. Commissioner of Social Security*, No. 6:22-CV-01103 (CFH), 2024 WL 1142012, at *4 (N.D.N.Y. Mar. 15, 2024)
- *Ramirez v. Commissioner of Social Security*, No. 23-CV-5806 (VSB) (BCM), 2024 WL 3046605, at *15 (S.D.N.Y. May 31, 2024)