

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
IOWA

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

Natasha H. · No. 25-CV-2003-CJW-MAR · Decided March 24, 2026

SUMMARY

The United States District Court for the Northern District of Iowa reviewed and adopted a magistrate judge’s Report and Recommendation in a Social Security disability benefits action. The court affirmed the evaluation of the physical therapist’s opinion but reversed and remanded because the vocational evidence did not adequately establish whether the school bus monitor position was full-time or provide sufficient regional job data. The remand was ordered under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Northern District of Iowa
WRITING FOR THE COURT	C.J. Williams
JURISDICTION	United States District Court for the Northern District of Iowa
DECIDED	March 24, 2026
DOCKET	25-CV-2003-CJW-MAR
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Review of a magistrate judge's report and recommendation in an action challenging the Commissioner's denial of disability insurance benefits.
STANDARD OF REVIEW	The court reviews the Commissioner's decision to determine whether it is supported by substantial evidence on the record as a whole and whether the Commissioner applied the proper legal standards. The court considers evidence supporting and detracting from the decision but may not reweigh the evidence or reverse merely because substantial evidence could support an opposite conclusion. Unobjected-to portions of a magistrate judge's report and recommendation are reviewed at least for clear error; the district judge may conduct a more exacting review.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown

PARTIES

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

TOPICS

judicial review of agency action

agency adjudication

administrative law

civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's vocational evidence adequately established that the identified jobs were available in sufficient numbers, including whether school bus monitor work was typically full-time and whether regional job numbers were available.
2. Whether the ALJ properly evaluated the opinions of physical therapist Casey Doyle.
3. Whether the unobjected-to report and recommendation should be accepted under the governing standards for review of magistrate judge recommendations.

HOLDINGS

1. The ALJ's decision was not supported by substantial evidence because the vocational evidence did not establish whether school bus monitor positions were typically full-time and did not provide regional job numbers for the identified occupations. The decision therefore had to be reversed and remanded for further development of the record.
2. The ALJ did not err in evaluating Casey Doyle's opinions because substantial evidence supported the ALJ's assessment of their consistency and supportability.
3. The court accepted the magistrate judge's report and recommendation without modification because neither party objected and the court found the recommendation sound.

KEY QUOTATIONS

"The "Court must affirm the Commissioner's decision if it is supported by substantial evidence on the record as a whole." (Section II.A)

"It may very well be that school bus monitor jobs are typically full-time positions, but it seems unlikely, and it is certainly not a conclusion this Court can reach on the record before it." (Section IV.A)

"Consistent with Judge Roberts' recommendation, the Commissioner's determination is reversed, and this matter is remanded to the Commissioner under sentence four of Section 405(g) for further proceedings consistent with this order and Judge Roberts' R&R." (Section V)

FACTUAL BACKGROUND

Claimant alleged disability beginning November 1, 2021, based on a herniated disc in her neck, depression, and anxiety. The ALJ found severe impairments including fibromyalgia, spinal disorders involving compromise of a

nerve root, and obesity, but determined that claimant retained the residual functional capacity for a restricted range of light work. Although claimant could not return to past work, the ALJ relied on vocational evidence identifying call out operator, school bus monitor, and children's attendant positions. The district court found the vocational evidence insufficiently developed concerning whether school bus monitor work was full-time and concerning regional job numbers, but upheld the ALJ's evaluation of physical therapist Casey Doyle's opinions.

PROCEDURAL HISTORY

The Commissioner denied Natasha H.'s application for Title II disability insurance benefits. An administrative law judge issued an unfavorable decision, finding that claimant was not disabled because she could perform other work available in the national economy. The magistrate judge recommended affirming in part and reversing in part, with remand for further development of vocational evidence. Neither party objected, and the district court accepted the report and recommendation without modification, reversed the Commissioner's determination, and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter is remanded to the Commissioner under sentence four of 42 U.S.C. § 405(g) for further proceedings consistent with the order and the magistrate judge's report and recommendation. The Commissioner must further develop vocational evidence concerning whether the school bus monitor position is typically full- or part-time and the regional availability of all three identified occupations.

CASES CITED

- Pelkey v. Barnhart, 433 F.3d 575, 577 (8th Cir. 2006)
- Lewis v. Barnhart, 353 F.3d 642, 645 (8th Cir. 2003)
- Kelley v. Callahan, 133 F.3d 583, 587 (8th Cir. 1998)
- Culbertson v. Shalala, 30 F.3d 934, 939 (8th Cir. 1994)
- Turley v. Sullivan, 939 F.2d 524, 528 (8th Cir. 1991)
- Vester v. Barnhart, 416 F.3d 886, 889 (8th Cir. 2005)
- Kluesner v. Astrue, 607 F.3d 533, 536 (8th Cir. 2010)
- Baldwin v. Barnhart, 349 F.3d 549, 555 (8th Cir. 2003)
- Cline v. Sullivan, 939 F.2d 560, 564 (8th Cir. 1991)
- Sobania v. Secretary of Health & Human Services, 879 F.2d 441, 444 (8th Cir. 1989)
- Gavin v. Heckler, 811 F.2d 1195, 1199 (8th Cir. 1987)
- Baker v. Heckler, 730 F.2d 1147, 1150 (8th Cir. 1984)
- Goff v. Barnhart, 421 F.3d 785, 789 (8th Cir. 2005)
- Grinder v. Gammon, 73 F.3d 793, 795 (8th Cir. 1996)

- *Anderson v. City of Bessemer City*, 470 U.S. 564, 574 (1985)
- *United States v. U.S. Gypsum Co.*, 333 U.S. 364, 395 (1948)
- *Thomas v. Arn*, 474 U.S. 140, 154 (1985)

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