

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Joseph A. v. Frank Bisignano, Commissioner of the Social Security
Administration

Joseph A. · No. 1:24-cv-12449 · Decided March 25, 2026

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the denial of Joseph A.'s application for Social Security Disability Insurance benefits. The court granted the plaintiff's motion to reverse, denied the Commissioner's motion for summary judgment, and remanded because the ALJ failed to address checkbox findings concerning the plaintiff's ability to work with coworkers and peers in assessing his mental residual functional capacity.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Beth W. Jantz
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	March 25, 2026
DOCKET	1:24-cv-12449
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Action under 42 U.S.C. § 405(g) seeking judicial review of the Commissioner's final decision denying Disability Insurance Benefits. The parties consented to proceed before a United States Magistrate Judge. Plaintiff moved to reverse the Commissioner's decision, and the Commissioner moved for summary judgment.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's final decision was supported by substantial evidence and whether the ALJ adequately explained the analysis to permit meaningful judicial review. The court would not reweigh evidence or substitute its judgment for the ALJ's, but could not affirm a decision lacking evidentiary support, adequate discussion, or free from legal error.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

PARTIES

Joseph A. v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action

administrative law

agency adjudication

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately accounted for the state agency psychological consultants' checkbox findings that Plaintiff was moderately limited in working in coordination with or in proximity to others and getting along with coworkers or peers.
2. Whether the ALJ was required to explain the treatment or exclusion of those checkbox limitations in the residual functional capacity assessment.

HOLDINGS

1. The ALJ committed reversible error by failing to address the consultants' checkbox opinions that Plaintiff was moderately limited in working with others and getting along with coworkers or peers.
2. The Commissioner's decision was reversed and the case was remanded for further proceedings because the ALJ's failure to address the material checkbox limitations was reversible error.

KEY QUOTATIONS

“But the ALJ also did not otherwise address Dr. Tin’s and Dr. Jackson’s checkbox opinions that Joseph is moderately limited in his abilities to work in coordination with or in proximity to others without being distracted by them or get along with coworkers or peers without distracting them or exhibiting behavioral extremes.” (Discussion)

“The ALJ’s failure to address these checkbox opinions was a reversible error.” (Discussion)

“Worksheet observations, while perhaps less useful to an ALJ than a doctor’s narrative RFC assessment, are nonetheless medical evidence which cannot just be ignored.” (Discussion)

“On remand, the Court does not require the ALJ to add RFC limitations that account for all of Dr. Tin’s and Dr. Jackson’s opinions.” (Discussion)

FACTUAL BACKGROUND

Joseph A. alleged disability beginning December 5, 2019, following a workplace accident, and applied for Disability Insurance Benefits. The ALJ found several severe and non-severe impairments, assessed a residual functional capacity for restricted light work, and concluded that Joseph could perform other jobs existing in significant numbers in the national economy. State agency psychological consultants identified moderate

checkbox limitations involving concentration, working with others, and getting along with coworkers or peers, but the ALJ addressed only portions of their narrative assessments and did not address the latter checkbox limitations.

PROCEDURAL HISTORY

The Social Security Administration denied Plaintiff's application initially and on reconsideration. After two administrative hearings, an ALJ denied benefits, and the Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court granted Plaintiff's motion, denied the Commissioner's motion for summary judgment, reversed the Commissioner's decision, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Social Security Administration must conduct further proceedings consistent with the memorandum opinion and order, including addressing the state agency psychological consultants' checkbox findings concerning Plaintiff's ability to work with and get along with coworkers or peers and explaining any resulting RFC determination.

CASES CITED

- Haynes v. Barnhart, 416 F.3d 621, 626 (7th Cir. 2005)
- Warnell v. O'Malley, 97 F.4th 1050, 1052-53 (7th Cir. 2024)
- Biestek v. Berryhill, 587 U.S. 97, 102 (2019)
- Scroggum v. Colvin, 765 F.3d 685, 695 (7th Cir. 2014)
- Gedatus v. Saul, 994 F.3d 893, 900 (7th Cir. 2021)
- Lopez ex rel. Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Denton v. Astrue, 596 F.3d 419, 423 (7th Cir. 2010)
- DeCamp v. Berryhill, 916 F.3d 671, 676 (7th Cir. 2019)
- Yurt v. Colvin, 758 F.3d 850, 859 (7th Cir. 2014)
- Varga v. Colvin, 794 F.3d 809, 816 (7th Cir. 2015)
- Adela G. v. Kijakazi, No. 21-cv-00209, 2024 WL 168101, at *4 (N.D. Ill. Jan. 16, 2024)
- Monique J. v. Kijakazi, No. 22-cv-04573, 2023 WL 7110746, at *3 (N.D. Ill. Oct. 27, 2023)
- Sarah O. v. O'Malley, No. 23-cv-50045, 2024 WL 1254536, at *4-*5 (N.D. Ill. Mar. 25, 2024)
- Leesa S. v. Kijakazi, No. 20-cv-01874, 2023 WL 2186010, at *5 (N.D. Ill. Feb. 23, 2023)
- Capman v. Colvin, 617 F. App'x 575, 579 (7th Cir. 2015)
- Pytlewski v. Saul, 791 F. App'x 611, 616 (7th Cir. 2019)
- Johansen v. Barnhart, 314 F.3d 283, 289 (7th Cir. 2002)

- Dudley v. Berryhill, 773 F. App'x 838, 843 (7th Cir. 2019)
- Baldwin v. Berryhill, 746 F. App'x 580, 584 (7th Cir. 2018)
- Apke v. Saul, 817 F. App'x 252, 257 (7th Cir. 2020)
- Urbanek v. Saul, 796 F. App'x 910, 915 (7th Cir. 2019)
- Heinrich v. Astrue, No. 12-cv-04352, 2013 WL 4506876, at *5 (N.D. Ill. Aug. 23, 2013)
- Simon-Leveque v. Colvin, 229 F. Supp. 3d 778, 787 (N.D. Ill. 2017)

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