

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Dana C. v. Frank Bisignano, Commissioner, Social Security Administration

Dana C. · No. Civil No. 24-3353-DRM · Decided December 22, 2025

SUMMARY

The United States District Court for the District of Maryland remanded the Commissioner of Social Security’s denial of Dana C.’s claim for Disabled Widow’s Insurance Benefits. The court held that the Administrative Law Judge failed to adequately analyze the consistency of a treating psychiatric provider’s opinion under 20 C.F.R. § 404.1520c, and that the omission could have affected the residual functional capacity and disability determination.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Maryland                                                                                                                                                                                                                                                                                                                                                                                                              |
| WRITING FOR THE COURT | Douglas R. Miller                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| JURISDICTION          | United States District Court for the District of Maryland                                                                                                                                                                                                                                                                                                                                                                                                              |
| DECIDED               | December 22, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| DOCKET                | Civil No. 24-3353-DRM                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| DISPOSITION           | remanded                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| PROCEDURAL POSTURE    | Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disabled Widow's Insurance Benefits. The court reviewed the administrative record and the parties' briefs without a hearing and remanded under sentence four of § 405(g).                                                                                                                                                                                       |
| STANDARD OF REVIEW    | The court must uphold the Commissioner's decision if it is supported by substantial evidence and reached through application of the correct legal standards. Substantial evidence is evidence that a reasoning mind would accept as sufficient to support a conclusion; it is more than a mere scintilla but may be less than a preponderance. Judicial review also requires the ALJ to analyze relevant evidence and sufficiently explain the findings and rationale. |
| PRECEDENTIAL VALUE    | unpublished district court memorandum opinion                                                                                                                                                                                                                                                                                                                                                                                                                          |
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## PARTIES

Dana C. v. Frank Bisignano, Commissioner, Social Security Administration

## TOPICS

judicial review of agency action

agency adjudication

administrative law

ada / disability

## PRACTICE AREAS

Social Security

administrative law

judicial review of agency action

## QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the persuasiveness of NP Walker's medical opinion under 20 C.F.R. § 404.1520c.
2. Whether the ALJ sufficiently analyzed the consistency of NP Walker's opinion with evidence from other medical and nonmedical sources.
3. Whether the failure to perform the required consistency analysis may have affected the residual functional capacity assessment and disability determination.

## HOLDINGS

1. The ALJ failed to comply with 20 C.F.R. § 404.1520c(b)(2) because the decision did not analyze whether NP Walker's opinion was consistent with evidence from other medical and nonmedical sources.
2. The ALJ's failure to analyze consistency was potentially consequential and required remand because a different assessment of NP Walker's opinion could alter the RFC and the disability determination.

## KEY QUOTATIONS

*“The Court must uphold the decision of the SSA if it is supported by substantial evidence and if the SSA employed proper legal standards.” (Page 1)*

*“The scope of the Court’s review is limited to determining whether substantial evidence supports the ALJ’s factual findings and whether the decision was reached through the application of the correct legal standards.” (Page 3)*

*“However, evaluating a medical opinion for inconsistency with that medical source’s own treatment records is not an analysis of “consistency” within the meaning of 20 C.F.R. § 404.1520c(c)(2).” (Page 5)*

*“Therefore, remand is necessary so that the ALJ can provide an analysis of NP Walker’s opinion that fully comports with 20 C.F.R. § 404.1520c.” (Page 5)*

## FACTUAL BACKGROUND

Plaintiff applied for Disabled Widow's Insurance Benefits and alleged disability based principally on anxiety, depression, and bipolar disorder. Her psychiatric provider, Artelia Walker, CRNP-PMH, prepared a Mental Capacity Assessment identifying marked and extreme limitations, including limitations in maintaining a

schedule, completing a normal workweek, maintaining a consistent pace, and responding to workplace changes. The ALJ found Plaintiff capable of simple, routine, repetitive work with limited social interaction and minimal workplace changes, and relied on vocational testimony to conclude that she could perform jobs existing in significant numbers. The vocational expert testified that off-task behavior of 15 percent or more of the workday or two or more unexpected absences per month would preclude competitive employment.

## PROCEDURAL HISTORY

Plaintiff applied for Disabled Widow's Insurance Benefits in October 2019. The claim was denied initially and on reconsideration; following a December 2023 hearing, an ALJ found Plaintiff not disabled on March 20, 2024. The Appeals Council denied review, and Plaintiff petitioned the District of Maryland for review. The court remanded because the ALJ failed to analyze whether a treating provider's opinion was consistent with evidence from other medical and nonmedical sources as required by 20 C.F.R. § 404.1520c.

## DISPOSITION

remanded

## REMAND INSTRUCTIONS

The Commissioner must provide an analysis of NP Walker's opinion that fully complies with 20 C.F.R. § 404.1520c, including an explanation of the opinion's consistency with evidence from other medical and nonmedical sources. The court did not direct the ALJ to assign any particular level of persuasiveness or reach a particular disability determination.

## CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106–07 (2000)
- Kiser v. Saul, 821 F. App'x 211, 212 (4th Cir. 2020)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439–40 (4th Cir. 1997)
- DeLoatch v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Drumgold v. Commissioner of Social Security, 144 F.4th 596, 604–05 (4th Cir. 2025)
- Travis W. v. Dudek, No. 24-0159-CDA, 2025 WL 923407, at \*3 (D. Md. Mar. 26, 2025)
- Marie T. v. O'Malley, No. 23-1320-CDA, 2024 WL 2114811, at \*3 (D. Md. May 10, 2024)

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