

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
OKLAHOMA

L. N. D. v. Frank Bisignano, Commissioner, Social Security
Administration

L. N. D. · No. CIV-24-1271-HE · Decided January 20, 2026

SUMMARY

This Report and Recommendation addresses judicial review of the Social Security Administration’s denial of disabled widow’s benefits to the plaintiff. The magistrate judge recommends reversing and remanding because the administrative law judge inadequately explained the evaluation of treating provider Taylor Lewis’s medical opinion concerning the plaintiff’s brittle type 1 diabetes and recurring hypoglycemia and hyperglycemia. The recommendation does not address the plaintiff’s remaining claims of error.

CASE DETAILS

COURT	United States District Court for the Western District of Oklahoma
WRITING FOR THE COURT	Chris M. Stephens, United States Magistrate Judge
JURISDICTION	United States District Court for the Western District of Oklahoma
DECIDED	January 20, 2026
DOCKET	CIV-24-1271-HE
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Report and recommendation on judicial review of the Commissioner of Social Security's denial of disabled widow's benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's factual findings are supported by substantial evidence and whether the correct legal standards were applied. The court does not reweigh the evidence or substitute its judgment for the agency's, but must also reverse when the agency fails to apply the correct legal standards or explain its reasoning adequately.
PRECEDENTIAL VALUE	Nonprecedential report and recommendation; persuasive authority only unless adopted by the district court.
PARTIES	L. N. D. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of Taylor Lewis's medical opinion under 20 C.F.R. § 404.1520c.
2. Whether the ALJ's rejection of Lewis's opinion was supported by substantial evidence and adequately explained.

HOLDINGS

1. The ALJ failed to adequately explain or support the finding that Lewis's opinion was not supported by her treatment notes because the ALJ did not identify the treatment records purportedly inconsistent with the opinion and mistakenly attributed a consultative examination to Lewis.
2. The ALJ failed to adequately explain or support the finding that Lewis's opinion was inconsistent with Plaintiff's treatment history and other substantial evidence.
3. The Commissioner's decision should be reversed and remanded for further administrative proceedings because the court could not follow the ALJ's reasoning regarding Lewis's opinion and the error was more than merely technical.

KEY QUOTATIONS

“Judicial review of the Commissioner’s final decision is limited to determining whether the factual findings are supported by substantial evidence in the record and whether the correct legal standards were applied.”
(Section III)

“Here, the undersigned cannot follow the ALJ’s reasoning and the omissions are more than merely technical.”
(Section IV.A.3)

FACTUAL BACKGROUND

Plaintiff had type 1 diabetes with persistent and extreme fluctuations in blood glucose, including recurrent hypoglycemic and hyperglycemic episodes. Her primary-care provider, Taylor Lewis, APRN-CNP, opined that Plaintiff's brittle diabetes and frequent episodes requiring monitoring and treatment would make it difficult for her to maintain stable employment. The administrative record documented uncontrolled diabetes, glucose readings in the 40s and above 200, several hypoglycemic episodes per week, a seizure associated with low blood sugar, and continuing variability despite treatment.

PROCEDURAL HISTORY

The Social Security Administration denied Plaintiff's application initially and on reconsideration. An administrative law judge denied benefits on March 27, 2024, finding at step five that Plaintiff could perform other work existing in significant numbers in the national economy. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The case was referred to the magistrate judge for proposed findings and recommendation, and the magistrate judge recommended reversal and remand for further administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The recommendation directs the district court to reverse and remand the Commissioner's decision for further administrative proceedings, including proper consideration and explanation of the supportability and consistency of Taylor Lewis's medical opinion. The report does not resolve Plaintiff's remaining claims of error.

CASES CITED

- Wall v. Astrue, 561 F.3d 1048, 1052 (10th Cir. 2009)
- Noreja v. Comm'r, SSA, 952 F.3d 1172, 1177-78 (10th Cir. 2020)
- Keyes-Zachary v. Astrue, 695 F.3d 1156, 1166-67 (10th Cir. 2012)
- Vigil v. Colvin, 805 F.3d 1199, 1201 (10th Cir. 2015)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Lax v. Astrue, 489 F.3d 1080, 1084 (10th Cir. 2007)
- Hamlin v. Barnhart, 365 F.3d 1208, 1214 (10th Cir. 2004)
- Riley v. Comm'r, SSA, No. 25-5007, 2025 WL 3276227, at *3 (10th Cir. Nov. 25, 2025)
- Flaherty v. Astrue, 515 F.3d 1067, 1070 (10th Cir. 2007)
- Watkins v. Barnhart, 350 F.3d 1297, 1299 (10th Cir. 2003)
- Moore v. United States, 950 F.2d 656, 659 (10th Cir. 1991)