

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
OKLAHOMA

D.R.Q. v. Frank Bisignano

D.R.Q. v. Frank Bisignano · No. CIV-25-244-ALM · Decided February 27, 2026

SUMMARY

The United States District Court for the Western District of Oklahoma reviewed the denial of D.R.Q.'s application for Social Security disability insurance benefits. The court held that the Administrative Law Judge provided conclusory and circular explanations when evaluating medical opinions and prior administrative medical findings under 20 C.F.R. § 404.1520c. The court reversed the Commissioner's decision and remanded for further proceedings.

CASE DETAILS

COURT	United States District Court for the Western District of Oklahoma
JURISDICTION	United States District Court for the Western District of Oklahoma
DECIDED	February 27, 2026
DOCKET	CIV-25-244-ALM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The parties consented to proceed before a magistrate judge.
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal standards and whether the agency's factual findings are supported by substantial evidence. The court reviews the administrative record as a whole, does not reweigh the evidence, and does not substitute its judgment for that of the agency.
PRECEDENTIAL VALUE	Unknown
PARTIES	D.R.Q. v. Frank Bisignano, Acting Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of Dr. Shawn Khavari's medical opinion under 20 C.F.R. § 404.1520c.
2. Whether the ALJ adequately evaluated the supportability and consistency of the prior administrative medical findings of Dr. Stephanie Crall and Dr. Lisa Swisher.
3. Whether the ALJ's conclusory evaluation of the opinion evidence and prior administrative findings required reversal and remand.

HOLDINGS

1. The ALJ erred by failing to adequately explain the consistency of Dr. Khavari's opinion with the other medical and nonmedical evidence and by relying on a conclusory, circular explanation.
2. The ALJ erred by failing to explain what evidence was consistent or inconsistent with the state-agency consultants' findings and by offering only conclusory statements that simple-task and moderate limitations were supported.
3. The Commissioner's decision is reversed and the matter is remanded for further proceedings.

KEY QUOTATIONS

“At a minimum, though, an ALJ must eschew rote analysis and conclusory explanations and discuss the crucial factors in any determination with sufficient specificity to enable the reviewing court to decide whether the determination is supported by substantial evidence.”

“This kind of circular logic is conclusory and also does not sufficiently allow the Court to determine whether the ALJ's finding is supported by substantial evidence.”

FACTUAL BACKGROUND

Plaintiff applied for disability insurance benefits alleging disability from physical and mental impairments, including emphysema, obesity, bipolar disorder, depression, anxiety, and attention deficit disorder. The ALJ found that Plaintiff could perform medium work with physical, environmental, and mental limitations, including simple, routine, and repetitive work, and concluded at step five that he could perform jobs existing in significant numbers in the national economy. The district court focused on the ALJ's treatment of medical opinion evidence and prior administrative medical findings.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits, and the Social Security Administration denied the application initially and on reconsideration. Following an administrative hearing, the ALJ found Plaintiff not disabled, and the Appeals Council denied review. The district court reversed the Commissioner's decision and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

On remand, the ALJ must properly consider and explain the persuasive value of Dr. Khavari's medical opinion and the prior administrative medical findings, including properly supported discussions of supportability and consistency.

CASES CITED

- Williams v. Bowen, 844 F.2d 748, 750-51 (10th Cir. 1988)
- Fischer-Ross v. Barnhart, 431 F.3d 729, 731 (10th Cir. 2005)
- Bowen v. Yuckert, 482 U.S. 137, 142 (1987)
- Noreja v. Commissioner, SSA, 952 F.3d 1172, 1177 (10th Cir. 2020)
- Staheli v. Commissioner, SSA, 84 F.4th 901, 905 (10th Cir. 2023)
- Wilson v. Astrue, 602 F.3d 1136, 1140 (10th Cir. 2010)
- Lax v. Astrue, 489 F.3d 1080, 1084 (10th Cir. 2007)
- Grogan v. Barnhart, 399 F.3d 1257, 1261 (10th Cir. 2005)
- Vigil v. Colvin, 805 F.3d 1199, 1201 (10th Cir. 2015)
- White v. Barnhart, 287 F.3d 903, 908 (10th Cir. 2002)
- J.T.L. v. Kijakazi, 2023 WL 5017241, at *5 (D. Colo. Aug. 7, 2023)
- A.B. v. Dudek, 2025 WL 786551, at *5 (D. Colo. Mar. 12, 2025)
- Cobb v. Kijakazi, No. CIV-22-551-AMG, 2023 WL 4013336, at *4 (W.D. Okla. June 14, 2023)
- Wall v. Astrue, 561 F.3d 1048, 1051 (10th Cir. 2009)
- Watkins v. Barnhart, 350 F.3d 1297, 1299 (10th Cir. 2003)

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