

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, HARRISON DIVISION

Ivan L. Martin v. Frank Bisignano, Commissioner, Social Security
Administration

Martin · No. 3:25-cv-03040 · Decided February 5, 2026

SUMMARY

The court reviews a Social Security Administration decision denying Ivan L. Martin’s claim for supplemental security income benefits. It concludes that the administrative law judge failed to articulate the persuasiveness of medical opinion evidence as required by 20 C.F.R. § 404.1520c. The court reverses the denial and remands the matter to the Commissioner for further consideration under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Harrison Division
WRITING FOR THE COURT	Christy D. Comstock
JURISDICTION	United States District Court for the Western District of Arkansas, Harrison Division
DECIDED	February 5, 2026
DOCKET	3:25-cv-03040
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Plaintiff's application for supplemental security income benefits.
STANDARD OF REVIEW	The court reviews the Commissioner's decision to determine whether it contains legal error and whether the factual findings are supported by substantial evidence on the record as a whole. Substantial evidence is less than a preponderance but enough that a reasonable mind would find it adequate.
PRECEDENTIAL VALUE	Unknown; district court memorandum opinion
PARTIES	Ivan L. Martin v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

agency adjudication

administrative law

remedies

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ's failure to articulate the persuasiveness of Dr. Joseph Michel's medical opinion complied with the medical-opinion evaluation requirements of 20 C.F.R. § 404.1520c.
2. Whether the Commissioner's denial of SSI benefits was supported by substantial evidence.

HOLDINGS

1. The ALJ's failure to articulate the persuasiveness assigned to Dr. Joseph Michel's medical opinion violated 20 C.F.R. § 404.1520c and warranted remand.
2. The Commissioner's decision denying benefits was not supported by substantial evidence because the ALJ failed to properly evaluate the medical-opinion evidence.

FACTUAL BACKGROUND

Plaintiff alleged disability from musculoskeletal impairments, chronic pain, and depression. The ALJ found multiple severe physical and mental impairments but concluded that Plaintiff did not meet or equal a listed impairment, retained the residual functional capacity for a restricted range of light work, and could perform several jobs identified by a vocational expert. The ALJ discussed medical opinions but did not articulate how persuasive the opinion of Dr. Joseph Michel was.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income, later amended his alleged onset date, and dismissed the disability-insurance claim because his date last insured preceded the amended onset date. After a hearing, the administrative law judge denied the SSI claim, and the Appeals Council denied review on May 13, 2025. Plaintiff then filed this action, and both parties submitted appeal briefs.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must fully evaluate the medical-opinion evidence in accordance with 20 C.F.R. § 404.1520c, re-evaluate Plaintiff's residual functional capacity, and specifically include in any hypothetical to a vocational expert all limitations indicated by the RFC assessment and supported by the evidence.

CASES CITED

- Brown v. Colvin, 825 F.3d 936, 939 (8th Cir. 2016)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Lawson v. Colvin, 807 F.3d 962, 964 (8th Cir. 2015)
- Miller v. Colvin, 784 F.3d 472, 477 (8th Cir. 2015)
- Pearsall v. Massanari, 274 F.3d 1211, 1217 (8th Cir. 2001)
- McCoy v. Schweiker, 683 F.2d 1138, 1141-42 (8th Cir. 1982)
- Higgins v. Apfel, 222 F.3d 504, 505 (8th Cir. 2000)
- Bonnett v. Kijakazi, 859 F. App'x 19 (8th Cir. 2021)
- Brandy B. v. Dudek, No. 4:25-CV-394 SRW, 2025 WL 3227484, at *5 (E.D. Mo. Nov. 19, 2025)

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