

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
CALIFORNIA

Vaughn J. v. Frank Bisignano

Case No. 24cv1124-SBC (S.D. Cal. Sept. 26, 2025) · No. 24cv1124-SBC; 3:24-cv-01124 · Decided September 26, 2025

SUMMARY

The United States District Court for the Southern District of California reviews a denial of supplemental security income benefits under 42 U.S.C. § 405(g). The court concludes that the administrative law judge inadequately evaluated the supportability of several medical opinions when determining the plaintiff’s residual functional capacity. The order reverses the Commissioner’s decision and remands the matter for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Southern District of California
WRITING FOR THE COURT	G. F. [name not fully legible in source]
JURISDICTION	United States District Court for the Southern District of California
DECIDED	September 26, 2025
DOCKET	24cv1124-SBC; 3:24-cv-01124
DISPOSITION	vacated
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying supplemental security income benefits. The parties filed a joint motion for judicial review.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and lack of substantial evidence. Substantial evidence is more than a mere scintilla but less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate. The court may not make independent findings or affirm on grounds not invoked by the agency, but may affirm harmless error.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Vaughn J. v. Frank Bisignano, Acting Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

exhaustion of remedies

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence.
2. Whether the ALJ properly evaluated the supportability and consistency of the medical opinions.
3. Whether the ALJ's heightened duty to develop the record was triggered and satisfied.
4. Whether the case should be remanded for further administrative proceedings or for an immediate award of benefits.

HOLDINGS

1. The ALJ erred by failing to sufficiently articulate the supportability factor when finding the opinions of Dr. Kugel, Dr. Hawkins, Dr. Rozenfeld, and Dr. Taylor unpersuasive.
2. The ALJ failed to satisfy the heightened duty to develop the record.
3. The RFC determination was not supported by substantial evidence, and the errors were not harmless.
4. The appropriate remedy was remand for further administrative proceedings rather than an immediate award of benefits.

KEY QUOTATIONS

“An ALJ cannot reject a medical opinion as unsupported or inconsistent without explaining why, and that explanation must be supported by substantial evidence.” (Section V.A)

“The ALJ's duty to develop the record is heightened when a claimant's ability to protect his or her interests is adversely affected by a mental impairment.” (Section V.B)

“On remand, the ALJ must evaluate and explain both the consistency and the supportability factor in discussing each medical opinion, and develop the record further if necessary.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on autism, anxiety, schizoaffective disorder, and related mental limitations. The ALJ found several severe impairments and assessed a medium-work RFC with restrictions on task complexity, pace, workplace changes, and social interaction, ultimately finding that Plaintiff could perform several jobs. Plaintiff was unrepresented at the ALJ hearing, and the record included medical opinions stating that additional evidence or reevaluation was needed to assess the severity and functional effects of his impairments.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income in June 2021, alleging disability based on autism and a mental breakdown. The ALJ denied benefits on July 6, 2023, and the Appeals Council denied review on May 28, 2024. Plaintiff then filed this action. After initially dismissing the complaint with leave to amend at screening, the court considered the parties' joint motion, vacated the ALJ's decision, and remanded for further administrative proceedings.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The Commissioner must conduct further administrative proceedings. On remand, the ALJ must evaluate and explain both the consistency and supportability factors for each medical opinion, develop the record further if necessary, and clearly articulate the reasons for the decision so that a subsequent reviewer can trace the ALJ's reasoning.

CASES CITED

- Tackett v. Apfel, 180 F.3d 1094, 1098-99 (9th Cir. 1999)
- Andrews v. Shalala, 53 F.3d 1035, 1039-40 (9th Cir. 1995)
- Smolen v. Chater, 80 F.3d 1273, 1279, 1288 (9th Cir. 1996)
- Brown-Hunter v. Colvin, 806 F.3d 487, 492 (9th Cir. 2015)
- Magallanes v. Bowen, 881 F.2d 747, 750 (9th Cir. 1989)
- Ford v. Saul, 950 F.3d 1141, 1154 (9th Cir. 2020)
- Stout v. Commissioner, Social Security Administration, 454 F.3d 1050, 1054-55 (9th Cir. 2006)
- Woods v. Kijakazi, 32 F.4th 785, 791-94 (9th Cir. 2022)
- Steven R. T. v. Kijakazi, No. 20-CV-2257-KSC, 2022 WL 2303950, at *12 (S.D. Cal. June 24, 2022)
- Kitchen v. Kijakazi, 82 F.4th 732, 740 (9th Cir. 2023)
- Mayes v. Massanari, 276 F.3d 453, 459-60 (9th Cir. 2001)
- Tonapetyan v. Halter, 242 F.3d 1144, 1150 (9th Cir. 2001)
- Bousquet v. Apfel, 118 F. Supp. 2d 1049, 1056 (C.D. Cal. 2000)
- Higbee v. Sullivan, 975 F.2d 558, 562 (9th Cir. 1992)
- Tidwell v. Apfel, 161 F.3d 599, 602 (9th Cir. 1998)
- Rivera v. Berryhill, 2017 WL 5054656, at *4-5 (C.D. Cal. Oct. 31, 2017)
- Danielle L. v. Saul, No. 1:18-CV-3213-FVS, 2020 WL 3619081, at *9 (E.D. Wash. Mar. 11, 2020)
- Carmickle v. Commissioner, Social Security Administration, 533 F.3d 1155, 1162 (9th Cir. 2008)
- Trevizo v. Berryhill, 871 F.3d 664, 682 (9th Cir. 2017)
- Sprague v. Bowen, 812 F.2d 1226, 1232 (9th Cir. 1987)
- Benecke v. Barnhart, 379 F.3d 587, 593 (9th Cir. 2004)
- Leon v. Berryhill, 874 F.3d 1130 (9th Cir. 2017)

