

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Felicia Brunner v. Frank Bisignano, Commissioner of Social Security

Brunner · No. 1:25-CV-1021 · Decided April 2, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviews Felicia Brunner’s challenge to the denial of Title II Social Security disability benefits. The court holds that substantial evidence supports the Administrative Law Judge’s residual functional capacity assessment and finding that Brunner could perform her past relevant work as generally performed in the national economy. The court therefore affirms the Commissioner’s decision denying benefits.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Daryl F. Bloom
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	April 2, 2026
DOCKET	1:25-CV-1021
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the Commissioner's denial of a Title II Social Security disability-benefits application.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and reviews legal issues plenary. It may not reweigh the evidence or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Felicia Brunner v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

agency adjudication

disability definition

ada / disability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's residual-functional-capacity determination and finding that Brunner could perform her past relevant work as generally performed.
2. Whether the ALJ was required to determine the transferability of Brunner's work skills because she was closely approaching retirement age and limited to light work.
3. Whether the ALJ was required to accept a vocational-expert hypothetical incorporating frequent breaks and absences based on Brunner's subjective testimony.

HOLDINGS

1. The ALJ's finding that Brunner was not disabled was supported by substantial evidence and was based on a correct application of law.
2. The ALJ was not required to make a transferability-of-skills finding because the ALJ determined at Step 4 that Brunner could perform her past relevant work as generally performed.
3. The ALJ was not required to accept the vocational-expert testimony that no jobs would be available under a hypothetical incorporating frequent breaks and absences because those limitations were based on subjective allegations the ALJ reasonably found unsupported.

KEY QUOTATIONS

“Substantial evidence “does not mean a large or considerable amount of evidence, but rather such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.”” (13)

“Thus, the question before us is not whether the claimant is disabled, but rather whether the Commissioner’s finding that he or she is not disabled is supported by substantial evidence and was based upon a correct application of the law.” (15)

“Thus, we cannot re-weigh the evidence. Instead, we must determine whether there is substantial evidence to support the ALJ’s findings.” (15-16)

“Transferability of skills is an issue only when an individual’s impairment(s), though severe, . . . does prevent the performance of past relevant work (PRW), and that work has been determined to be skilled or semiskilled.” (26-27)

FACTUAL BACKGROUND

Brunner alleged disability from gastrointestinal, liver, musculoskeletal, and related impairments beginning in September 2019. During the relevant period, she experienced gastroparesis, nausea, vomiting, abdominal pain, and later alcoholic cirrhosis, but treatment records also documented improvement in her gastrointestinal symptoms after she stopped drinking alcohol, along with largely unremarkable findings and conservative treatment. The ALJ found that she retained the residual functional capacity for light work with postural restrictions and could perform her past work as a food service manager, golf club manager, and sales clerk as those occupations are generally performed.

PROCEDURAL HISTORY

Brunner applied for disability benefits and received a hearing before an Administrative Law Judge on March 14, 2024. The ALJ denied the application on May 20, 2024, finding that Brunner was not disabled through her date last insured and could perform her past relevant work as generally performed in the national economy. Brunner sought judicial review, arguing that the ALJ's decision was unsupported by substantial evidence. The district court affirmed the Commissioner's decision and denied the appeal.

DISPOSITION

affirmed

CASES CITED

- 139 S. Ct. 1148, 1154 (2019)
- *Consolo v. Fed. Maritime Comm'n*, 383 U.S. 607, 620 (1966)
- 529 F.3d 198, 200 (3d Cir. 2008)
- 487 U.S. 552, 565 (1988)
- 402 U.S. 389, 401 (1971)
- 994 F.2d 1058, 1064 (3d Cir. 1993)
- 777 F.3d 607, 611-12 (3d Cir. 2014)
- 220 F.3d 112, 119-21 (3d Cir. 2000)
- 312 F.3d 113, 129 (3d Cir. 2002)
- 667 F.3d 356, 363 (3d Cir. 2011)
- 336 F. App'x 152, 159-60 (3d Cir. 2009)

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