

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

Helen Semanski v. Frank Bisignano, Commissioner of Social Security

Semanski · No. 1:23-CV-414 · Decided March 13, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviewed the denial of Helen Semanski’s claim for Social Security disability insurance benefits. The court held that the Administrative Law Judge failed to adequately address substantial, largely undisputed evidence that Semanski medically required a cane for ambulation when determining her residual functional capacity. The court granted remand for further administrative proceedings.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                              |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                         |
| WRITING FOR THE COURT | Martin C. Carlson                                                                                                                                                                                                                                                            |
| JURISDICTION          | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                         |
| DECIDED               | March 13, 2026                                                                                                                                                                                                                                                               |
| DOCKET                | 1:23-CV-414                                                                                                                                                                                                                                                                  |
| DISPOSITION           | reversed_and_remanded                                                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of an application for disability insurance benefits.                                                                                                                                                   |
| STANDARD OF REVIEW    | The court reviews the Commissioner's factual findings for substantial evidence and reviews legal issues plenary. The court must also determine whether the ALJ adequately articulated the evidentiary and legal basis for the decision to permit meaningful judicial review. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                  |
| PARTIES               | Helen Semanski v. Frank Bisignano, Commissioner of Social Security                                                                                                                                                                                                           |

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence when it omitted any limitation for Semanski's medically necessary cane use.
2. Whether the ALJ adequately explained the rejection of the unanimous medical opinions and other evidence establishing Semanski's need for a cane.

## HOLDINGS

1. When substantial evidence establishes that a claimant medically needs a cane or other assistive device for ambulation, the ALJ must account for that device in the RFC assessment, particularly where the RFC includes significant mobility requirements.
2. An ALJ may not reject uncontradicted medical opinions concerning a claimant's functional limitations solely through the ALJ's own lay reinterpretation of the medical evidence.

## KEY QUOTATIONS

*"In short, everyone agreed that Helen Semanski needed a cane to safely ambulate." (2)*

*"Social Security regulations provide that an ALJ will not accommodate the use of a cane unless the claimant first provides "medical documentation establishing the need for a hand-held assistive device to aid in walking or standing, and describing the circumstances for which it is needed[.]"" (17)*

*"In short, where substantial evidence indicates that there is a medical need for a claimant to use a cane or assistive device, the failure to adequately address these issues constitutes a failure of articulation by the ALJ warranting a remand." (18)*

## FACTUAL BACKGROUND

Semanski, age 59 when she alleged disability, had suffered a stroke that left her with longstanding right-sided weakness, instability, and impaired mobility. Her testimony, a friend's report, two state-agency medical opinions, a consulting examining physician, and a treating physician assistant all indicated that she needed a cane for balance and ambulation. Despite that medical consensus, the ALJ found that she did not need a cane and assessed an RFC permitting light work with frequent balancing and other substantial mobility requirements; the vocational expert testified that cane use combined with sedentary limitations would prevent Semanski from performing her past work.

## PROCEDURAL HISTORY

Semanski applied for disability insurance benefits alleging disability based on a prior stroke and residual right-sided weakness. After a hearing at which Semanski and a vocational expert testified, the ALJ denied the claim, finding that Semanski could perform light work and return to her past work as an elementary school teacher. Semanski appealed, arguing that the ALJ failed to account for her medically necessary cane use in determining her residual functional capacity.

## DISPOSITION

reversed\_and\_remanded

## REMAND INSTRUCTIONS

The Commissioner's final decision denying the claims was vacated, and the case was remanded for a new administrative hearing and further consideration of Semanski's medically necessary cane use and its effect on her RFC and ability to perform past work. The court did not direct a particular ultimate disability finding.

## CASES CITED

- *Cotter v. Harris*, 642 F.2d 700, 704, 706-07 (3d Cir. 1981)
- *Stahurski v. O'Malley*, No. 3:22-CV-1807, 2024 WL 3204243 (M.D. Pa. June 27, 2024)
- *Jordan v. Kijakazi*, No. 1:21-CV-01975, 2023 WL 2616099 (M.D. Pa. Mar. 23, 2023)
- *Dieter v. Saul*, No. 1:19-CV-1081, 2020 WL 2839087 (M.D. Pa. June 1, 2020)
- *Johnson v. Commissioner of Social Security*, 529 F.3d 198, 200 (3d Cir. 2008)
- *Ficca v. Astrue*, 901 F. Supp. 2d 533, 536 (M.D. Pa. 2012)
- *Pierce v. Underwood*, 487 U.S. 552, 565 (1988)
- *Richardson v. Perales*, 402 U.S. 389, 401 (1971)
- *Mason v. Shalala*, 994 F.2d 1058, 1064 (3d Cir. 1993)
- *Consolo v. Federal Maritime Commission*, 383 U.S. 607, 620 (1966)
- *Leslie v. Barnhart*, 304 F. Supp. 2d 623, 627 (M.D. Pa. 2003)
- *Biestek v. Berryhill*, 139 S. Ct. 1148, 1154 (2019)
- *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)
- *T-Mobile South, LLC v. Roswell*, 574 U.S. 293, 135 S. Ct. 808, 815 (2015)
- *Dickinson v. Zurko*, 527 U.S. 150, 153 (1999)
- *Arnold v. Colvin*, No. 3:12-CV-02417, 2014 WL 940205, at \*1 (M.D. Pa. Mar. 11, 2014)
- *Burton v. Schweiker*, 512 F. Supp. 913, 914 (W.D. Pa. 1981)
- *Wright v. Sullivan*, 900 F.2d 675, 678 (3d Cir. 1990)
- *Zirnsak v. Colvin*, 777 F.3d 607, 611 (3d Cir. 2014)
- *Rutherford v. Barnhart*, 399 F.3d 546, 552 (3d Cir. 2005)
- *Burnett v. Commissioner of Social Security*, 220 F.3d 112, 119-21 (3d Cir. 2000)
- *Jones v. Barnhart*, 364 F.3d 501, 505 & n.3 (3d Cir. 2004)
- *Diaz v. Commissioner of Social Security*, 577 F.3d 500, 504 (3d Cir. 2009)
- *Biller v. Acting Commissioner of Social Security*, 962 F. Supp. 2d 761, 778-79 (W.D. Pa. 2013)
- *Gormont v. Astrue*, No. 11-2145, 2013 WL 791455, at \*7 (M.D. Pa. Mar. 4, 2013)
- *Titterington v. Barnhart*, 174 F. App'x 6, 11 (3d Cir. 2006)
- *Cummings v. Colvin*, 129 F. Supp. 3d 209, 214-15 (W.D. Pa. 2015)

- Burns v. Barnhart, 312 F.3d 113, 129 (3d Cir. 2002)
- Metzger v. Berryhill, No. 3:16-CV-1929, 2017 WL 1483328, at \*5 (M.D. Pa. Mar. 29, 2017)
- Rathbun v. Berryhill, No. 3:17-CV-00301, 2018 WL 1514383, at \*6 (M.D. Pa. Mar. 12, 2018)
- Schauddeck v. Commissioner of Social Security, 181 F.3d 429, 433 (3d Cir. 1999)
- Williams v. Colvin, No. 3:13-CV-2158, 2014 WL 4918469, at \*10 (M.D. Pa. Sept. 30, 2014)
- Howze v. Barnhart, 53 F. App'x 218, 222 (3d Cir. 2002)
- Steward v. Commissioner of Social Security, No. CIV.A. 08-1741, 2009 WL 1783533, at \*5 (W.D. Pa. June 23, 2009)
- Graver v. Colvin, No. 3:13CV1811, 2014 WL 1746976, at \*5 (M.D. Pa. May 1, 2014)
- Butler v. Astrue, No. CIV.A. 11-376, 2012 WL 1252758, at \*7 (W.D. Pa. Apr. 13, 2012)
- Ubiles v. Berryhill, No. 15-CV-895-RJA-MJR, 2017 WL 4712208, at \*6 (W.D.N.Y. Sept. 29, 2017)
- Wright v. Colvin, No. 6:13-cv-6585(MAT), 2015 WL 4600287, at \*5 (W.D.N.Y. July 29, 2015)
- Morales v. Apfel, 225 F.3d 310, 318 (3d Cir. 2000)
- Tilton v. Colvin, 184 F. Supp. 3d 135, 143 (M.D. Pa. 2016)
- Burns v. Colvin, 156 F. Supp. 3d 579, 598 (M.D. Pa. Jan. 13, 2016)