

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Natasha J. v. Commissioner of Social Security

No. 23-CV-06333-MJR, United States District Court for the Western District of New York (March 11, 2026)

SUMMARY

The United States District Court for the Western District of New York reviewed the denial of Natasha J.'s application for Supplemental Security Income. The court granted the plaintiff's motion for judgment on the pleadings, denied the Commissioner's motion, and remanded for further administrative proceedings, including updated IQ testing and a supplemental psychological examination. The court found that the ALJ improperly rejected prior IQ scores and failed to adequately develop the record.

CASE DETAILS

COURT	United States District Court for the Western District of New York
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 11, 2026
DOCKET	23-CV-06333-MJR
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner's denial of Supplemental Security Income. Both parties moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviews the Commissioner's factual determinations under the substantial-evidence standard and reviews whether the Commissioner applied the correct legal standard. The court may not substitute its judgment for the Commissioner's or resolve evidentiary conflicts, but remand or reversal is required when factual findings lack substantial evidence or the correct legal standard was not applied.
PRECEDENTIAL VALUE	unpublished district court decision
PARTIES	Natasha J. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

motion for judgment on the pleadings

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PRACTICE AREAS

Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ's step-three determination was supported by substantial evidence when the ALJ rejected Plaintiff's prior IQ scores as unreliable without obtaining updated IQ testing or relying on a qualified specialist's assessment.
2. Whether the record required further development through intelligence testing and a supplemental psychological examination.
3. Whether the ALJ properly evaluated Plaintiff's claim at step five.

HOLDINGS

1. The ALJ erred by rejecting Plaintiff's IQ scores as unreliable without a qualified specialist questioning their validity and by failing to address the consultative psychologist's recommendation for further IQ testing.
2. Remand was required for further intelligence or IQ testing and a supplemental psychological examination because the absence of current scores created a gap that prevented meaningful judicial review.
3. The alleged error was not harmless because it was unclear whether updated IQ testing would alter the ALJ's and medical experts' conclusions.

KEY QUOTATIONS

"The substantial evidence test applies not only to findings on basic evidentiary facts, but also to inferences and conclusions drawn from the facts." (at 2)

"The rule effectively prohibits an ALJ from substituting his or her own lay opinion for that of medical professionals regarding the reliability of a claimant's IQ score." (at 7)

"In other words, the gap in the record must be filled before this Court can conduct a meaningful review." (at 8-9)

FACTUAL BACKGROUND

Plaintiff applied for SSI alleging disability beginning October 27, 2020. Her school records showed an IQ score of 73, including a verbal score of 62, placement in special education, and educational accommodations. A consultative psychologist later identified psychiatric and cognitive problems that could significantly interfere with Plaintiff's daily functioning and recommended updated IQ testing and a vocational assessment. The ALJ

discounted the prior IQ scores based on Plaintiff's activities, employment history, and ability to live independently, without obtaining updated cognitive testing.

PROCEDURAL HISTORY

Plaintiff applied for SSI, and the application was denied initially and on reconsideration. Following a hearing, an ALJ denied the claim on October 18, 2022. The Appeals Council declined review on April 17, 2023. The district court granted Plaintiff's motion for judgment on the pleadings, denied the Commissioner's motion, and remanded for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The Commissioner must order further intelligence or IQ testing of Plaintiff and a supplemental psychological examination, further develop the record, and consider Plaintiff's step-five argument on remand.

CASES CITED

- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Smith v. Colvin, 17 F. Supp. 3d 260, 264 (W.D.N.Y. 2014)
- Veino v. Barnhart, 312 F.3d 578, 586, 588 (2d Cir. 2002)
- Silvers v. Colvin, 67 F. Supp. 3d 570, 574 (W.D.N.Y. 2014)
- Sample v. Schweiker, 694 F.2d 639, 642 (9th Cir. 1982)
- Carroll v. Secretary of Health & Human Services, 705 F.2d 638, 642 (2d Cir. 1983)
- Kohler v. Astrue, 546 F.3d 260, 265 (2d Cir. 2008)
- Dumas v. Schweiker, 712 F.2d 1545, 1550 (2d Cir. 1983)
- Miles v. Harris, 645 F.2d 122, 124 (2d Cir. 1981)
- Cuspert v. Acting Commissioner of Social Security, No. 20 CIV. 10583 (SLC), 2022 WL 4355128, at *8 (S.D.N.Y. Sept. 20, 2022)
- Jackson v. Berryhill, 694 F. App'x 39, 42 (2d Cir. 2017)
- Shamar R. v. Kijakazi, No. 21-CV-6106F, 2023 WL 415097, at *5 (W.D.N.Y. Jan. 26, 2023)
- Jasmin G. v. Commissioner of Social Security, 22-CV-06155-MJR, 2024 WL 4274840, at *13-*15 (W.D.N.Y. Sept. 24, 2024)

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