

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
OHIO, EASTERN DIVISION

Katherine R. Childress v. Commissioner of Social Security  
Administration

Case No. 1:24-CV-02022-AMK (N.D. Ohio Feb. 20, 2026) · No. 1:24-CV-02022-AMK · Decided February 20,  
2026

SUMMARY

The United States District Court for the Northern District of Ohio reviews the Commissioner of Social Security’s denial of Katherine R. Childress’s applications for Supplemental Security Income and Medicare Qualified Government Employee benefits. The court evaluates challenges concerning neuropathy symptoms, anxiety, PTSD, and medical-opinion evidence under 42 U.S.C. § 405(g). The court affirms the Commissioner’s final decision.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Ohio, Eastern Division                                                                                                                                                                                                                                                                           |
| WRITING FOR THE COURT | Amanda M. Knapp                                                                                                                                                                                                                                                                                                                                            |
| JURISDICTION          | United States District Court for the Northern District of Ohio, Eastern Division                                                                                                                                                                                                                                                                           |
| DECIDED               | February 20, 2026                                                                                                                                                                                                                                                                                                                                          |
| DOCKET                | 1:24-CV-02022-AMK                                                                                                                                                                                                                                                                                                                                          |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her applications for Supplemental Security Income and Medicare Qualified Government Employee benefits.                                                                                                                                              |
| STANDARD OF REVIEW    | The court reviews whether the Commissioner applied the correct legal standards and whether the ALJ's factual findings are supported by substantial evidence. The court may not try the case de novo, resolve conflicts in the evidence, or decide credibility questions, and must affirm when substantial evidence supports the Commissioner's conclusion. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                                                                                                |

## PARTIES

Katherine R. Childress v. Commissioner of Social Security  
Administration

## TOPICS

judicial review of agency action

administrative law

disability definition

ada / disability

## PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

## QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to designate alleged peripheral neuropathy, anxiety, and PTSD as severe medically determinable impairments at step two.
2. Whether the ALJ properly evaluated the persuasiveness of the medical opinions of Childress's treating providers under 20 C.F.R. § 416.920c.
3. Whether the ALJ's residual functional capacity assessment complied with SSR 96-8p and was supported by substantial evidence.
4. Whether the Commissioner's final decision denying benefits should be affirmed under 42 U.S.C. § 405(g).

## HOLDINGS

1. The ALJ did not err in declining to find peripheral neuropathy a severe medically determinable impairment because Childress did not identify objective medical evidence establishing peripheral neuropathy, and the cited EMG showed no electrodiagnostic evidence of peripheral neuropathy.
2. The ALJ's failure to designate anxiety and PTSD as severe impairments was not reversible error because the ALJ found another severe mental impairment and considered Childress's mental symptoms and limitations at subsequent steps of the sequential analysis.
3. The ALJ adequately evaluated the opinions of Dr. Samsa, CNP Raimey, and Dr. Gornik under the current persuasiveness regulations, and substantial evidence supported the findings that the opinions were unpersuasive or only partially persuasive.
4. The ALJ complied with the governing RFC requirements and reasonably determined that Childress could perform restricted light work with four hours of standing or walking, postural and environmental restrictions, and limitations to simple routine work without high production quotas or hourly piece-rate work.

## KEY QUOTATIONS

*“Since an MDI may not be established by a “statement of symptoms, a diagnosis, or a medical opinion” alone, see 20 C.F.R. § 416.921, Plaintiff has not met her burden to show that the ALJ erred when she did not find peripheral neuropathy to be a severe MDI.” (Section VI.B.2)*

*“Thus, Sixth Circuit precedent indicates that Plaintiff cannot demonstrate harmful error warranting remand simply by showing that her anxiety and PTSD could have been deemed “severe” MDIs.” (Section VI.B.3)*

*“Because Plaintiff’s arguments focus on what she thinks the ALJ should have found, rather than identifying specific errors or omissions in the ALJ’s written analysis, her arguments effectively ask this Court to reweigh the evidence.” (Section VI.D)*

## FACTUAL BACKGROUND

Childress alleged disability based on cardiac conditions, spontaneous coronary artery dissection, fibromyalgia, rheumatoid and other inflammatory conditions, neuropathic symptoms, anxiety, PTSD, and depression. The medical record included repeated normal neurological examinations and a normal 2019 EMG showing no electrodiagnostic evidence of peripheral neuropathy, while also documenting cardiac, rheumatological, and mental-health treatment. The ALJ found severe chronic ischemic heart disease, an aortic-valve disorder, a thyroid disorder, rheumatoid arthritis, and depressive disorder, but determined that Childress retained the residual functional capacity for restricted light work and could perform jobs such as cashier and order caller.

## PROCEDURAL HISTORY

Childress filed applications for MQGE benefits and SSI in 2019, alleging disability beginning February 28, 2018. Her applications were denied initially and on reconsideration. After hearings in 2020, 2022, and 2023, and two remands by the Appeals Council, an ALJ issued a decision on October 31, 2023, finding her not disabled. The Appeals Council declined review on September 23, 2024, making the ALJ’s decision final. Childress filed this action on November 20, 2024. The court affirmed the Commissioner’s final decision.

## DISPOSITION

affirmed

## CASES CITED

- Sullivan v. Zebley, 493 U.S. 521, 525 n.3 (1990)
- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 405-06 (6th Cir. 2009)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 535 (6th Cir. 2001)
- Besaw v. Secretary of Health & Human Services, 966 F.2d 1028, 1030 (6th Cir. 1992)
- Brainard v. Secretary of Health & Human Services, 889 F.2d 679, 681 (6th Cir. 1989)
- McClanahan v. Commissioner of Social Security, 474 F.3d 830, 833 (6th Cir. 2006)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Jones v. Commissioner of Social Security, 336 F.3d 469, 477 (6th Cir. 2003)
- Rabbers v. Commissioner of Social Security Administration, 582 F.3d 647, 651 (6th Cir. 2009)

- *Bowen v. Commissioner of Social Security*, 478 F.3d 742, 746 (6th Cir. 2007)
- *Wilson v. Commissioner of Social Security*, 378 F.3d 541, 546-47 (6th Cir. 2004)
- *Fleischer v. Astrue*, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- *Sarchet v. Chater*, 78 F.3d 305, 307 (7th Cir. 1996)
- *Foster v. Secretary of Health & Human Services*, 899 F.2d 1221, at \*2 (6th Cir. 1990) (unpublished table decision)
- *Murphy v. Secretary of Health & Human Services*, 801 F.2d 182, 185 (6th Cir. 1986)
- *Griffeth v. Commissioner of Social Security*, 217 F. App'x 425, 428 (6th Cir. 2007)
- *Long v. Apfel*, 1 F. App'x 326, 330-32 (6th Cir. 2001)
- *Despins v. Commissioner of Social Security*, 257 F. App'x 923, 930 (6th Cir. 2007)
- *Anthony v. Astrue*, 266 F. App'x 451, 457 (6th Cir. 2008)
- *Pompa v. Commissioner of Social Security*, 73 F. App'x 801, 803 (6th Cir. 2003)
- *Simpson v. Commissioner of Social Security*, 344 F. App'x 181, 190-91 (6th Cir. 2009)
- *Napier v. Commissioner of Social Security*, 127 F.4th 1000, 1003 (6th Cir. 2025)
- *Stewart v. IHT Insurance Agency Group, LLC*, 990 F.3d 455, 457 (6th Cir. 2021)
- *Kestel v. Commissioner of Social Security*, 756 F. App'x 593, 597 (6th Cir. 2018)
- *Fisk v. Astrue*, 253 F. App'x 580, 583 (6th Cir. 2007)
- *Poe v. Commissioner of Social Security*, 342 F. App'x 149, 157 (6th Cir. 2009)
- *Her v. Commissioner of Social Security*, 203 F.3d 388, 392 (6th Cir. 1999)
- *Gayheart v. Commissioner of Social Security*, 710 F.3d 365, 376 (6th Cir. 2013)