

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

LaDonna Smith v. Frank Bisignano, Commissioner, Social Security
Administration

Smith v. Bisignano · No. 3:25-cv-00071-BSM-JJV · Decided January 8, 2026

SUMMARY

This proposed findings and recommended disposition addresses LaDonna Smith’s appeal from the Social Security Commissioner’s denial of disability insurance benefits and supplemental security income. The magistrate judge concludes that substantial evidence supports the ALJ’s determination that Smith could perform her past relevant work and that the ALJ did not commit legal error in evaluating her mental impairments or fibromyalgia. The magistrate judge recommends affirming the Commissioner’s decision and dismissing the complaint with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
WRITING FOR THE COURT	United States Magistrate Judge (name not shown in source)
JURISDICTION	United States District Court for the Eastern District of Arkansas, Northern Division
DECIDED	January 8, 2026
DOCKET	3:25-cv-00071-BSM-JJV
DISPOSITION	other
PROCEDURAL POSTURE	Proposed findings and recommended disposition on judicial review of the Commissioner's denial of disability insurance benefits and supplemental security income. The magistrate judge recommended affirmance of the Commissioner's decision and dismissal with prejudice of the complaint, subject to objections and review by the district judge.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence on the record as a whole and is free of legal error. Substantial evidence is relevant evidence that a reasonable mind might accept as adequate to support a conclusion. The court must consider evidence detracting from as well as supporting the decision,

	but may not reverse merely because substantial evidence would also support an opposite result.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	LaDonna Smith v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's finding that Smith's PTSD and anxiety caused no more than minimal limitations and were nonsevere.
2. Whether the ALJ was required to include mental limitations in the RFC based solely on mild limitations found under the paragraph B criteria at steps two and three.
3. Whether the ALJ adequately evaluated evidence concerning fibromyalgia and the opinion of Margaret Podkova, Psy.D.
4. Whether the Commissioner's final decision was supported by substantial evidence and free of legal error.

HOLDINGS

1. Mild limitations identified under the paragraph B criteria at steps two and three do not, by themselves, require the ALJ to include mental limitations in the step-four or step-five RFC assessment.
2. Substantial evidence supported the ALJ's finding that Smith's PTSD and anxiety did not cause more than minimal limitations in her ability to perform basic mental work activities and therefore were nonsevere.
3. The ALJ did not commit reversible error by finding fibromyalgia nonsevere and by discounting the fibromyalgia component of Dr. Podkova's assessment where the opinion was unsupported and appeared largely based on Smith's allegations.
4. The Commissioner's decision was supported by substantial evidence and was not based on legal error.

KEY QUOTATIONS

“The limitations identified in the “paragraph B” criteria are not a residual functional capacity assessment but are used to rate the severity of mental impairments at steps 2 and 3 of the sequential evaluation process. The mental residual functional capacity assessment used at steps 4 and 5 of the sequential evaluation process requires a more detailed assessment.” (Tr. 21-22)

“But it is not the task of a court to review the evidence and make an independent decision. Neither is it to reverse the decision of the ALJ because there is evidence in the record which contradicts his findings.” (Tr.

FACTUAL BACKGROUND

Smith, age sixty-seven, is a high school graduate who attended one year of college and previously worked as a claims clerk. She alleged disability beginning December 4, 2020, and had a date last insured of December 31, 2023. The ALJ found severe cervical and lumbar degenerative disc disease with neuropathy and osteoarthritis of the knees, hips, and shoulders, but found PTSD, anxiety, and fibromyalgia nonsevere or insufficiently supported. Based on the medical evidence, including consultative examinations and imaging, the ALJ found that Smith could perform a reduced range of sedentary work and could return to her past relevant work.

PROCEDURAL HISTORY

The Administrative Law Judge found that Smith had severe physical impairments but that her PTSD and anxiety were nonsevere, determined that she retained the residual functional capacity for a reduced range of sedentary work, and concluded that she could perform her past relevant work as a claims clerk. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Smith filed a federal complaint challenging the decision, arguing that the ALJ failed to account for or explain the omission of mental limitations in the RFC and improperly evaluated evidence concerning fibromyalgia.

DISPOSITION

other

CASES CITED

- Long v. Chater, 108 F.3d 185, 187 (8th Cir. 1997)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Reynolds v. Chater, 82 F.3d 254, 257 (8th Cir. 1996)
- Woolf v. Shalala, 3 F.3d 1210, 1213 (8th Cir. 1993)
- Lacroix v. Barnhart, 465 F.3d 881, 888 n.3 (8th Cir. 2006)
- Chismarich v. Berryhill, 888 F.3d 978, 980 (8th Cir. 2018)
- Gwathney v. Chater, 104 F.3d 1043, 1045 (8th Cir. 1997)
- Browning v. Sullivan, 958 F.2d 817, 821 (8th Cir. 1992)
- Hudson v. Bowen, 870 F.2d at 1396
- Kirby v. Astrue, 500 F.3d 705, 707 (8th Cir. 2007)
- Page v. Astrue, 484 F.3d 1040, 1043 (8th Cir. 2007)
- Trenary v. Bowen, 898 F.2d 1361, 1364 (8th Cir. 1990)
- Sykes v. Bowen, 854 F.2d 284, 285 (8th Cir. 1988)
- Thomas v. Sullivan, 928 F.2d 255, 260 (8th Cir. 1991)
- Robertson v. Sullivan, 925 F.2d 1124, 1126-27 (8th Cir. 1991)
- Mapes v. Chater, 82 F.3d 259, 262 (8th Cir. 1996)

- Pratt v. Sullivan, 956 F.2d 830, 833 (8th Cir. 1992)
- Reutter ex rel. Reutter v. Barnhart, 372 F.3d 946, 950 (8th Cir. 2004)

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