

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Alyssa Nicole Stremme v. Commissioner of Social Security

Case No. 3:25-CV-310 JD · No. 3:25-CV-310 JD · Decided May 21, 2026

SUMMARY

The United States District Court for the Northern District of Indiana reviews Alyssa Nicole Stremme’s challenge to the denial of Social Security disability insurance benefits and supplemental security income. The court concludes that the ALJ failed to adequately explain the handling of Plaintiff’s mild mental-functioning limitations, particularly in concentration, persistence, or pace and interaction with others, and failed to account for those limitations in the residual functional capacity assessment. The court remands the case to the Social Security Administration for further proceedings.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Jon E. DeGuilio
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	May 21, 2026
DOCKET	3:25-CV-310 JD
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner of Social Security's denial of disability insurance benefits and supplemental security income after an Administrative Law Judge found her not disabled and the Appeals Council denied review.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence, conducts a critical review of the evidence, and may not reweigh the evidence, resolve conflicts, determine credibility, or substitute its judgment for the Commissioner's. The ALJ must build a logical bridge between the evidence and the conclusions.
PRECEDENTIAL VALUE	unpublished
PARTIES	Alyssa Nicole Stremme v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the finding that Plaintiff had mild limitations in concentration, persistence, or pace and incorporated those limitations into the RFC.
2. Whether the ALJ adequately explained the finding that Plaintiff had a mild limitation in interacting with others and incorporated that limitation into the RFC.
3. Whether the ALJ's failure to explain the treatment of the mental-functioning limitations was harmless error.

HOLDINGS

1. The ALJ failed to provide a sufficient explanation for finding mild limitations in concentration, persistence, or pace because the decision did not explain how evidence that Plaintiff was alert and answered questions during appointments affected her ability to sustain work-related tasks.
2. The ALJ did not adequately explain why Plaintiff's mild limitation in interacting with others required no corresponding RFC restriction.
3. The error was not harmless because the court could not predict with great confidence what the result of remand would be.

KEY QUOTATIONS

"As a general rule, both the hypothetical posed to the VE and the ALJ's RFC assessment must incorporate all of the claimant's limitations supported by the medical record."

"While the Court accords great deference to the ALJ's findings, it may not rubber-stamp them, and the ALJ must build a logical bridge between the evidence and his conclusions."

"Omitting the restrictions without any explanation constitutes a reversible error."

"The ALJ either had to account for them in the RFC or explain why the limitations did not warrant additional restrictions."

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on chronic pain, degenerative changes in the lumbar and cervical spine, migraines, carpal tunnel syndrome, sciatica, anxiety, and depression. The ALJ found severe physical impairments, nonsevere anxiety and depression, and an RFC for light work with physical and environmental restrictions but no mental restrictions. Although the ALJ found Plaintiff mildly limited in interacting with others

and in concentrating, persisting, or maintaining pace, the decision did not explain how those limitations affected her ability to sustain full-time work or why they required no RFC restrictions.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income, alleging disability beginning in May 2017. An ALJ applied the five-step disability analysis and found that Plaintiff was not disabled because she could perform her past relevant work as a home health worker. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court reversed and remanded for further administrative proceedings because the ALJ did not adequately explain how mild mental-functioning limitations were evaluated or incorporated into the residual functional capacity.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter is remanded to the Social Security Administration for further proceedings. On remand, the ALJ should identify Plaintiff's mental-functioning limitations with greater specificity and explain what, if any, corresponding restrictions must be included in the RFC, particularly regarding interaction with others and concentration, persistence, or pace.

CASES CITED

- Schomas v. Colvin, 732 F.3d 702, 707 (7th Cir. 2013)
- Craft v. Astrue, 539 F.3d 668, 673 (7th Cir. 2008)
- Richardson v. Perales, 402 U.S. 389, 399-401 (1971)
- Warnell v. O'Malley, 97 F.4th 1050, 1052, 1054 (7th Cir. 2024)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Skinner v. Astrue, 478 F.3d 836, 841 (7th Cir. 2007)
- Elder v. Astrue, 529 F.3d 408, 413 (7th Cir. 2008)
- Lopez ex rel. Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Zurawski v. Halter, 245 F.3d 881, 887 (7th Cir. 2001)
- Terry v. Astrue, 580 F.3d 471, 475 (7th Cir. 2009)
- Estok v. Apfel, 152 F.3d 636, 638 (7th Cir. 1998)
- Dixon v. Massanari, 270 F.3d 1171, 1176 (7th Cir. 2001)
- Young v. Barnhart, 362 F.3d 995, 1000 (7th Cir. 2004)
- Cervantes v. Kijakazi, No. 20-3334, 2021 WL 6101361, at *2 (7th Cir. Dec. 21, 2021)
- Holiday v. O'Malley, No. 2:23-CV-302, 2024 WL 2860088, at *3 (N.D. Ind. June 5, 2024)
- Yurt v. Colvin, 758 F.3d 850, 857 (7th Cir. 2014)
- Alesia v. Astrue, 789 F. Supp. 2d 921, 933 (N.D. Ill. 2011)

- Paar v. Astrue, No. 09 C 5169, 2012 U.S. Dist. LEXIS 4948, 2012 WL 123596, at *13 (N.D. Ill. Jan. 17, 2012)
- Judy M. v. Kijakazi, 658 F. Supp. 3d 596, 602-03 (N.D. Ill. 2023)
- Jarnutowski v. Kijakazi, 48 F.4th 769, 773 (7th Cir. 2022)
- Butler v. Kijakazi, 4 F.4th 498, 501 (7th Cir. 2021)
- Berger v. Astrue, 516 F.3d 539, 544 (7th Cir. 2008)
- Moy v. Bisignano, 142 F.4th 546, 552 (7th Cir. 2025)
- Chrisman on behalf of N.R.C. v. Bisignano, 137 F.4th 618, 624 (7th Cir. 2025)
- Patricia A.G. v. Kijakazi, No. 21 C 5573, 2023 WL 2683470, at *4 (N.D. Ill. Mar. 29, 2023)
- Viviana R. v. Kijakazi, No. 19-CV-07419, 2022 WL 3354840, at *5 (N.D. Ill. Aug. 12, 2022)
- Alonzo S. v. O'Malley, 757 F. Supp. 3d 822, 827-28 (N.D. Ill. 2024)
- Simon-Leveque v. Colvin, 229 F. Supp. 3d 778, 787 (N.D. Ill. 2017)
- Karen A. v. Kijakazi, No. 1:21-CV-3076, 2023 WL 2643235, at *5 (S.D. Ind. Mar. 27, 2023)
- Wilder v. Kijakazi, 22 F.4th 644, 654 (7th Cir. 2022)