

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Janelle Verhulst v. Commissioner of Social Security

Verhulst · No. 1:24-cv-1194 · Decided February 19, 2026

SUMMARY

The Report and Recommendation addresses Janelle Verhulst’s action seeking judicial review of the Commissioner of Social Security’s denial of disability insurance benefits. The magistrate judge recommends affirming the Commissioner’s decision, concluding that the ALJ’s residual functional capacity assessment and evaluation of medical opinions, pain, and other symptoms were supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Ray Kent
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	February 19, 2026
DOCKET	1:24-cv-1194
DISPOSITION	affirmed
PROCEDURAL POSTURE	Report and recommendation on judicial review of the Commissioner's final decision denying disability insurance benefits under 42 U.S.C. § 405(g).
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and gives fresh review to legal interpretations. It reviews the record as a whole, does not reweigh evidence or make credibility determinations, and must affirm if substantial evidence supports the decision even if the record also supports a contrary conclusion.
PRECEDENTIAL VALUE	Unknown; report and recommendation from a federal district court magistrate judge, with no final adoption order supplied.
PARTIES	Janelle Verhulst v. Commissioner of Social Security

TOPICS

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the persuasiveness of the treating mental-health source's opinion under 20 C.F.R. § 404.1520c.
2. Whether the ALJ improperly deviated from the state-agency psychological consultants' opinions without explanation.
3. Whether the ALJ complied with SSR 96-3p and properly considered all impairments in determining residual functional capacity.
4. Whether the ALJ properly evaluated Verhulst's symptoms, including pain, under SSR 16-3p and 20 C.F.R. § 404.1529.
5. Whether substantial evidence supported the Commissioner's finding that Verhulst was not disabled.

HOLDINGS

1. The ALJ's decision not to find Heather O'Brien's extreme mental-functional limitations persuasive was supported by substantial evidence because the limitations were inconsistent with the conservative longitudinal treatment record, documented improvement with counseling, and largely normal mental-status findings.
2. The ALJ was not required to adopt every limitation in state-agency opinions that the ALJ otherwise found persuasive, and the record did not require an additional explanation for declining to include a brief-and-superficial-interaction limitation that was inconsistent with the consultant's finding of only mild social limitation.
3. The ALJ adequately evaluated Verhulst's pain and other symptoms and reasonably incorporated the supported functional limitations into the residual functional capacity assessment.
4. The Commissioner's final decision denying disability insurance benefits should be affirmed because the ALJ's findings were supported by substantial evidence and were reached under the proper legal standards.

KEY QUOTATIONS

“Based on the foregoing, I find the claimant has the above residual functional capacity assessment, which is supported by evidence of ongoing complaints of pain and numbness in her hands due to central sensitization to pain and tenosynovitis, while retaining strength to perform a range of light exertion.” (PageID.41)

“Accordingly, the ALJ determined that plaintiff was not under a disability, as defined in the Social Security Act, from November 29, 2020 (the alleged onset date) through October 11, 2023 (the date of the decision).” (PageID.42)

FACTUAL BACKGROUND

Verhulst alleged disability based initially on tendonitis and had past work as a general laborer, hand packager, and inspector. The ALJ found severe impairments including bilateral carpal tunnel syndrome, bilateral tenosynovitis, central sensitization to pain, obesity, depression, and anxiety, but determined that she retained the residual functional capacity for a restricted range of light work with frequent bilateral handling and fingering and very short and simple instructions. The ALJ found that she could not perform past relevant work but could perform a significant number of other unskilled light jobs, including housekeeper, merchandise marker, and assembler. The magistrate judge concluded that the ALJ adequately evaluated the medical opinions, pain allegations, and functional limitations.

PROCEDURAL HISTORY

Verhulst applied for disability insurance benefits, alleging disability beginning November 29, 2020. An administrative law judge denied the claim on October 11, 2023, and the Appeals Council subsequently approved that decision, making it the Commissioner's final decision. Verhulst sought review in the Western District of Michigan, and the magistrate judge recommended affirming the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Taskila v. Commissioner of Social Security, 819 F.3d 902, 903 (6th Cir. 2016)
- McKnight v. Sullivan, 927 F.2d 241 (6th Cir. 1991)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Young v. Secretary of Health and Human Services, 925 F.2d 146 (6th Cir. 1990)
- Brainard v. Secretary of Health & Human Services, 889 F.2d 679, 681 (6th Cir. 1989)
- Willbanks v. Secretary of Health & Human Services, 847 F.2d 301, 303 (6th Cir. 1988)
- Cutlip v. Secretary of Health and Human Services, 25 F.3d 284, 286 (6th Cir. 1994)
- Abbott v. Sullivan, 905 F.2d 918, 923 (6th Cir. 1990)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 534 (6th Cir. 2001)
- Jones v. Commissioner of Social Security, 336 F.3d 469, 474 (6th Cir. 2003)
- Mullis v. Bowen, 861 F.2d 991, 993 (6th Cir. 1988)
- Wyatt v. Kijakazi, No. 23-1559, 2023 WL 6629761, at *1 (8th Cir. Oct. 12, 2023)
- Eric B. v. Kijakazi, No. CV 22-175 SCY, 2023 WL 5041192, at *5 (D.N.M. Aug. 8, 2023)
- Cohen v. Secretary of Department of Health and Human Services, 964 F.2d 524, 529 (6th Cir. 1992)
- Shavers v. Secretary of Health and Human Services, 839 F.2d 232, 234-35 (6th Cir. 1988)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 247 (6th Cir. 2007)
- Thomas v. Arn, 474 U.S. 140 (1985)
- United States v. Walters, 638 F.2d 947 (6th Cir. 1981)

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