

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Jennifer P. v. Commissioner of Social Security

No. 24-CV-91-LJV (W.D.N.Y. May 5, 2026) · No. 24-CV-91-LJV · Decided May 5, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the Commissioner's denial of Jennifer P.'s application for Supplemental Security Income. The court held that the ALJ properly evaluated the medical opinions, supportive housing, and alleged mental limitations, and that the residual functional capacity finding was supported by substantial evidence. The court denied Jennifer P.'s motion for judgment on the pleadings, granted the Commissioner's cross-motion, and dismissed the complaint.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Lawrence J. Vilardo
JURISDICTION	United States District Court for the Western District of New York
DECIDED	May 5, 2026
DOCKET	24-CV-91-LJV
DISPOSITION	dismissed
PROCEDURAL POSTURE	Action under 42 U.S.C. § 405(g) seeking review of the Commissioner's denial of Supplemental Security Income. The plaintiff moved for judgment on the pleadings, and the Commissioner cross-moved for judgment on the pleadings.
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal principles and whether the determination is supported by substantial evidence. Under the substantial-evidence standard, the court may reject the ALJ's factual findings only if a reasonable factfinder would have to conclude otherwise; where evidence is susceptible to more than one rational interpretation, the Commissioner's conclusion must be upheld.
PRECEDENTIAL VALUE	Unknown; district court opinion with no precedential-status designation in the source

PARTIES

Jennifer P. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment failed to account for moderate limitations identified by Dr. Brown and Dr. Bhutwala in completing a normal workday or workweek and maintaining a consistent pace.
2. Whether the ALJ improperly failed to consider or adequately explain the significance of Jennifer's supportive housing and related limitations when evaluating the intensity, persistence, and limiting effects of her symptoms.

HOLDINGS

1. The ALJ did not err by limiting Jennifer to simple instructions and tasks, simple unskilled work, and no strict production quotas. Those restrictions adequately accounted for the moderate limitations identified by Dr. Brown and Dr. Bhutwala.
2. The ALJ adequately considered Jennifer's supportive housing and related need for social-services assistance when evaluating her impairments, symptoms, and RFC. The ALJ's decision was supported by substantial evidence and was not legally erroneous.

KEY QUOTATIONS

"So long as an ALJ considers all the medical evidence and appropriately analyzes any medical opinions, an RFC consistent with the record is not error." (at 28)

"Because the ALJ indeed addressed Jennifer's need for supportive living and because he relied on opinion evidence explicitly finding that Jennifer had the capacity to work, Jennifer's argument is misplaced." (at 32)

"The ALJ's decision was not contrary to the substantial evidence in the record, nor did it result from any legal error." (Conclusion)

FACTUAL BACKGROUND

Jennifer P. applied for Supplemental Security Income, alleging disability based principally on bipolar disorder, schizophrenia, anxiety disorder, and ADHD. The ALJ found those impairments severe but determined that they did not meet or medically equal a listed impairment and that Jennifer retained the capacity for simple, unskilled work with specified environmental, social, and production restrictions. The record reflected that Jennifer received supportive housing and related social-services assistance, but medical-opinion evidence indicated that she retained the capacity to meet the basic mental demands of unskilled work.

PROCEDURAL HISTORY

Jennifer P. filed an application for Supplemental Security Income and challenged the Commissioner's determination that she was not disabled. An administrative law judge found that she was not disabled because, although she had severe mental impairments, she retained the residual functional capacity for certain simple, unskilled work and could perform jobs existing in significant numbers. The district court denied Jennifer's motion for judgment on the pleadings, granted the Commissioner's cross-motion, dismissed the complaint, and directed the Clerk to close the file.

DISPOSITION

dismissed

CASES CITED

- Johnson v. Bowen, 817 F.2d 983, 985-86 (2d Cir. 1987)
- Moran v. Astrue, 569 F.3d 108, 112 (2d Cir. 2009)
- Cruz v. Sullivan, 912 F.2d 8, 11 (2d Cir. 1990)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Consol. Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Brault v. Soc. Sec. Admin., Comm'r, 683 F.3d 443, 448 (2d Cir. 2012)
- McIntyre v. Colvin, 758 F.3d 146, 149 (2d Cir. 2014)
- Matta v. Astrue, 508 F. App'x 53, 56 (2d Cir. 2013)
- Schillo v. Kijakazi, 31 F.4th 64, 78 (2d Cir. 2022)
- Rubin v. Martin O'Malley, Comm'r of Soc. Sec., 116 F.4th 145, 155 (2d Cir. 2024)
- Cichocki v. Astrue, 729 F.3d 172, 177 (2d Cir. 2013)
- Karl E. v. Comm'r of Soc. Sec., 2025 WL 3003714, at *5 n.5 (W.D.N.Y. Oct. 27, 2025)
- Arthur M. v. Saul, 2021 WL 2309884, at *4 (W.D.N.Y. June 7, 2021)
- Denise Marie T.-W. v. Comm'r of Soc. Sec., 2024 WL 4162490, at *6 (W.D.N.Y. Sept. 12, 2024)
- Young v. Berryhill, 2019 WL 156262, at *6 (W.D.N.Y. Jan. 10, 2019)
- Meadors v. Astrue, 370 F. App'x 179, 183 (2d Cir. 2010)
- Ramsey v. Comm'r of Soc. Sec., 830 F. App'x 37, 39 (2d Cir. 2020)
- Valdez-Ocasio v. Kijakazi, 2023 WL 3573761, at *1 (2d Cir. May 22, 2023)
- Schaal v. Apfel, 134 F.3d 496, 501 (2d Cir. 1998)
- Genier v. Astrue, 606 F.3d 46, 49 (2d Cir. 2010)