

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Tracey Lynn Anderson v. Commissioner of Social Security

Anderson v. Commissioner of Social Security · No. 1:24-cv-00848-EPG · Decided April 8, 2025

SUMMARY

The United States District Court for the Eastern District of California reviewed a Social Security disability benefits decision involving right ulnar neuropathy. The court held that the Administrative Law Judge failed to determine whether the neuropathy was a severe impairment and failed to adequately account for it in the residual functional capacity assessment. The Commissioner’s decision was reversed and remanded for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Fahey
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 8, 2025
DOCKET	1:24-cv-00848-EPG
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's unfavorable decision denying disability insurance benefits. The parties consented to final judgment by a United States Magistrate Judge.
STANDARD OF REVIEW	The court reviewed the ALJ's factual findings, including the residual functional capacity assessment, for substantial evidence under 42 U.S.C. § 405(g). Substantial evidence is more than a mere scintilla but less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	unpublished district court decision
PARTIES	Tracey Lynn Anderson v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to determine at step two whether Plaintiff's medically determinable right ulnar neuropathy was a severe impairment.
2. Whether the ALJ adequately considered right ulnar neuropathy at subsequent steps, including the listings analysis and residual functional capacity assessment.
3. Whether the case should be remanded for immediate payment of benefits or for further administrative proceedings.

HOLDINGS

1. The medical evidence established that Plaintiff had a medically determinable impairment of right ulnar neuropathy before the ALJ hearing.
2. The ALJ committed reversible error by failing to consider whether right ulnar neuropathy was a severe impairment at step two and by failing to consider the impairment at subsequent steps, including whether it affected the listings analysis and the RFC.
3. Remand for further administrative proceedings, rather than immediate payment of benefits, was appropriate.

KEY QUOTATIONS

"The ALJ committed error in his consideration of Plaintiff's medically determinable impairment of right ulnar neuropathy." (at 6)

"Accordingly, the decision of the Commissioner of the Social Security Administration is REVERSED and REMANDED for further administrative proceedings consistent with this decision." (at 7)

FACTUAL BACKGROUND

A January 31, 2022 nerve-conduction study showed severe right ulnar neuropathy and mild bilateral carpal tunnel syndrome. A treating provider discussed decompression surgery because of the severe compression and existing intrinsic atrophy, but Plaintiff declined surgery at that time; later records documented worsening hand numbness and tingling and recommended braces. The ALJ acknowledged the medical evidence but found only carpal tunnel syndrome and obesity severe at step two, did not evaluate right ulnar neuropathy at step three, and limited Plaintiff to frequent bilateral handling and fingering without explaining how that limitation accounted for the neuropathy.

PROCEDURAL HISTORY

The Administrative Law Judge found that Plaintiff had severe carpal tunnel syndrome and obesity but did not address whether right ulnar neuropathy was a severe impairment or adequately account for it at later steps of the

sequential evaluation, including the residual functional capacity assessment. Plaintiff challenged the decision, requested an award of benefits or a remand, and the court remanded for further administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ must consider whether Plaintiff's medically determinable right ulnar neuropathy requires additional limitations in the RFC and, if so, whether those changes affect the ultimate disability determination. The court also directed consideration of the impairment at the appropriate earlier and later steps of the sequential evaluation.

CASES CITED

- Richardson v. Perales, 402 U.S. 389, 401-02 (1971)
- Sorenson v. Weinberger, 514 F.2d 1112, 1119 n.10 (9th Cir. 1975)
- Robbins v. Social Security Administration, 466 F.3d 880, 883 (9th Cir. 2006)
- Poliakov v. King, 2025 WL 457097, at *1 (9th Cir. 2025)
- Smolen v. Chater, 80 F.3d 1273, 1290 (9th Cir. 1996)
- Yuckert v. Bowen, 841 F.2d 303, 306 (9th Cir. 1988)
- Webb v. Barnhart, 433 F.3d 683, 686-87 (9th Cir. 2005)
- Lewis v. Astrue, 498 F.3d 909, 911 (9th Cir. 2007)
- Harman v. Apfel, 211 F.3d 1172, 1178 (9th Cir. 2000)
- Garrison v. Colvin, 759 F.3d 995, 1020-21 (9th Cir. 2014)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1101 (9th Cir. 2014)