

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

Russell Allen Beatty v. Commissioner of Social Security

Beatty · No. 5:25 CV 778 · Decided March 11, 2026

SUMMARY

The United States District Court for the Northern District of Ohio accepted the magistrate judge’s Report and Recommendation and affirmed the Commissioner of Social Security’s denial of Russell Allen Beatty’s disability benefits claims. The court held that the Administrative Law Judge properly considered the state agency psychologist’s residual functional capacity assessment and evaluated Beatty’s subjective symptoms under the applicable substantial-evidence standard.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Patricia A. Gaughan
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	March 11, 2026
DOCKET	5:25 CV 778
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability benefits. After the magistrate judge recommended affirmance, plaintiff objected to the Report and Recommendation.
STANDARD OF REVIEW	The district court reviews properly objected-to portions of a magistrate judge's Report and Recommendation de novo under 28 U.S.C. § 636(b) and Fed. R. Civ. P. 72(b)(3). Review of the Commissioner's decision is limited to whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence in the record as a whole. The reviewing court may not resolve evidentiary conflicts or decide credibility questions.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; precedential status not stated in the opinion.

PARTIES

Russell Allen Beatty v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ properly considered and incorporated the state-agency psychologist's RFC opinion into Beatty's residual functional capacity.
2. Whether the ALJ erred in evaluating Beatty's subjective reports of symptoms and limitations.
3. Whether the Commissioner's decision was supported by substantial evidence and applied the correct legal standards.

HOLDINGS

1. The ALJ did not err by evaluating the psychologist's narrative RFC assessment rather than treating every moderate limitation marked in the form's question-and-rating section as an additional RFC limitation.
2. The ALJ did not err in evaluating Beatty's reported symptoms because the asserted error was premised on the rejected claim that the ALJ failed to consider all of the psychologist's functional limitations.
3. The Commissioner's decision must be affirmed because the ALJ applied the correct legal standards and the decision was supported by substantial evidence.

KEY QUOTATIONS

“Substantial evidence is less than a preponderance but more than a scintilla; it refers to relevant evidence that a reasonable mind might accept as adequate to support a conclusion.” (2)

“The findings of the Commissioner are not subject to reversal merely because there exists in the record substantial evidence to support a different conclusion.” (2)

FACTUAL BACKGROUND

Beatty applied for disability insurance benefits and supplemental security income in 2022. The ALJ determined in 2024 that he was not disabled. Beatty challenged the residual functional capacity determination, arguing that the ALJ failed to incorporate all limitations reflected in a state-agency psychologist's assessment and therefore improperly evaluated his subjective symptoms. The psychologist's narrative RFC assessment stated that Beatty could perform a variety of tasks without a rapid pace and could work in a setting with occasional changes.

PROCEDURAL HISTORY

Beatty applied for Social Security Disability Insurance and Supplemental Security Income benefits in 2022. An administrative law judge found him not disabled in 2024, and the Appeals Council declined further review on March 5, 2025. Beatty filed this action on April 17, 2025. The magistrate judge recommended affirmance on November 25, 2025; the district court conducted de novo review of the objections, accepted the recommendation, and affirmed.

DISPOSITION

affirmed

CASES CITED

- Aldrich v. Bock, 327 F. Supp. 2d 743, 747 (E.D. Mich. 2004)
- Kyle v. Comm'r of Soc. Sec., 609 F.3d 847, 854-55 (6th Cir.)
- Gentry v. Comm'r of Soc. Sec., 741 F.3d 708, 722 (6th Cir.)
- Rogers v. Comm'r of Soc. Sec., 486 F.3d 234, 241 (6th Cir.)
- DeLong v. Comm'r of Soc. Sec. Admin., 748 F.3d 723, 726 (6th Cir.)
- McClanahan v. Comm'r of Soc. Sec., 474 F.3d 830, 833 (6th Cir.)
- Buxton v. Halter, 246 F.3d 762, 772 (6th Cir.)