

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Heath Dawson v. Frank Bisignano, Commissioner, Social Security Administration

Dawson · No. CJC-25-0959 · Decided March 17, 2026

SUMMARY

The United States District Court for the District of Maryland reviews the Social Security Administration's denial of Heath Dawson's application for supplemental security income. The court holds that the administrative law judge failed to adequately explain the specific sit/stand intervals included in Dawson's residual functional capacity assessment. The court reverses the Commissioner's decision and remands the case for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Chelsea J. Crawford
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 17, 2026
DOCKET	CJC-25-0959
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Petition for judicial review of the Commissioner of the Social Security Administration's final decision denying Dawson's application for supplemental security income.
STANDARD OF REVIEW	The court affirms the ALJ's decision if its factual findings are supported by substantial evidence and reached through application of the correct legal standard. Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. The court must also determine whether the ALJ examined all relevant evidence and provided a sufficient rationale for crediting or discrediting evidence.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Heath Dawson v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

administrative law

remedies

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the RFC limitation requiring Dawson to change positions for one to two minutes every thirty minutes.
2. Whether the Commissioner's final decision was supported by substantial evidence and reached through application of the correct legal standard.

HOLDINGS

1. The ALJ failed to provide an adequate explanation connecting the medical and other evidence to the specific conclusion that Dawson needed to change positions for one to two minutes every thirty minutes.
2. Remand was appropriate because inadequacies in the ALJ's analysis frustrated the court's ability to determine whether the decision was supported by substantial evidence.

KEY QUOTATIONS

“A proper RFC analysis has three components: (1) evidence, (2) logical explanation, and (3) conclusion.”
(Section IV)

“While this assessment might explain why a sit/stand limitation is necessary, it does not explain why the specific time intervals of the position changes are appropriate.” (Section IV)

“For the reasons set forth herein, pursuant to sentence four of 42 U.S.C. § 405(g), the Social Security Administration’s judgment is REVERSED due to inadequate analysis.” (Section V)

FACTUAL BACKGROUND

Dawson applied for supplemental security income alleging disability beginning June 4, 2021. The ALJ found severe impairments including lumbar degenerative joint and disc disease, residuals of a left shoulder labral tear, asthma, residuals of COVID-19 infections, specific antibody deficiency syndrome, allergic rhinitis, chronic sinusitis, hearing loss, tinnitus, and obesity. The ALJ assessed a sedentary-work RFC that included a sit/stand option permitting a one- to two-minute position change every thirty minutes, but did not explain why those specific intervals were supported by the evidence. The district court found that the unexplained interval frustrated judicial review.

PROCEDURAL HISTORY

Dawson applied for supplemental security income under Title XVI of the Social Security Act. His application was denied initially and on reconsideration. After a hearing, an administrative law judge found that Dawson was not disabled, and the Appeals Council denied review, making the ALJ's decision final. Dawson timely sought

judicial review in the District of Maryland, which reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Social Security Administration must conduct further proceedings and explain how the medical evidence supports Dawson's need for position changes at the specific time intervals imposed. The ALJ may also reconsider Dawson's other arguments and make any necessary adjustments.

CASES CITED

- *Hancock v. Astrue*, 667 F.3d 470, 472 (4th Cir. 2012)
- *Thomas v. Berryhill*, 916 F.3d 307, 310–11 (4th Cir. 2019), as amended (Feb. 22, 2019)
- *Brown v. Comm’r Soc. Sec. Admin.*, 873 F.3d 251, 254 (4th Cir. 2017)
- *Delores D. v. O’Malley*, Civil Action No. CDA-23-1170, 2024 WL 1966421, at *3 (D. Md. May 3, 2024)
- *Wilson v. Heckler*, 743 F.2d 218, 221 (4th Cir. 1984)
- *Shelley C. v. Comm’r of Soc. Sec. Admin.*, 61 F.4th 341, 353 (4th Cir. 2023)
- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Drumgold v. Comm’r of Soc. Sec.*, 144 F.4th 596, 605 (4th Cir. 2025)
- *Stephanie E. v. O’Malley*, Civil Action No. CDA-23-0343, 2024 WL 622105, at *4 (D. Md. Feb. 14, 2024)
- *Ronald J. v. Kijakazi*, Civil Action No. GLS-21-1845, 2022 WL 3134446, at *3–4 (D. Md. Aug. 5, 2022)
- *Candace W. v. Kijakazi*, Civil Action No. TJS-20-3344, 2022 WL 521967, at *2–3 (D. Md. Feb. 22, 2022)