

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Karen L. v. Frank Bisignano, Commissioner of Social Security

Karen L. · No. TJS-25-2269 · Decided April 16, 2026

SUMMARY

The United States District Court for the District of Maryland reviewed the denial of Karen L.'s claims for Disability Insurance Benefits and Supplemental Security Income. The court held that the Administrative Law Judge applied an improper, overly demanding standard at step two when evaluating Karen L.'s major depressive disorder and failed to account for supporting evidence. The court denied both parties' motions for summary judgment, reversed the Commissioner's decision in part, and remanded 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	Timothy J. Sullivan
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 16, 2026
DOCKET	TJS-25-2269
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review of the Commissioner's final decision denying Disability Insurance Benefits and Supplemental Security Income; both parties moved for summary judgment.
STANDARD OF REVIEW	The court must uphold the agency decision if it is supported by substantial evidence and the agency applied the proper legal standards. The court may affirm, modify, or reverse the Commissioner's decision, with or without remand, under 42 U.S.C. § 405(g).
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Karen L. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ applied the proper de minimis severity standard at step two of the Social Security sequential evaluation process.
2. Whether substantial evidence supported the ALJ's conclusion that Karen L. did not have a severe mental impairment or combination of impairments.

HOLDINGS

1. The ALJ erred by applying a standard more appropriately associated with residual functional capacity analysis rather than the de minimis step-two severity standard. The evidence showed that Karen L.'s depression rose above the threshold severity requirement, requiring the ALJ to continue through the remaining steps of the sequential evaluation.

KEY QUOTATIONS

“A claimant will be found to have a severe impairment if they prove that they have “any impairment or combination of impairments [that] significantly limits [their] physical or mental ability to do basic work activities.”” (Tr. 17)

“The question is whether Karen L.’s mental impairments for the period in question rise above the de minimis severity requirement.” (Tr. 23)

“Had the ALJ applied the proper standard, she would have concluded that Karen L.’s depression was a severe impairment at step two and continued with the rest of the five-step process.” (Tr. 23)

FACTUAL BACKGROUND

Karen L. alleged disability from March 14, 2020, through July 12, 2023, based in part on major depressive disorder and other physical impairments. The ALJ acknowledged evidence of low energy, stress, depression, slow attention, self-isolation, anxiety, depression symptoms, and difficulty with family relationships, but concluded at step two that none of her impairments was severe. The ALJ discounted opinions from state agency psychologist Maurice Prout, Ph.D., and treating provider Jane Iwebo, CRNP, concerning social and stress-related limitations, while relying on evidence showing stable mood or organized thought processes.

PROCEDURAL HISTORY

Karen L. applied for DIB and SSI in August 2020, alleging disability beginning March 14, 2020. Her applications were denied initially and on reconsideration. After a July 31, 2024 administrative hearing, the ALJ denied benefits on August 9, 2024, finding at step two that she had no severe impairment; the Appeals Council denied review. On judicial review, the court denied both motions for summary judgment, reversed the Commissioner's decision in part, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings consistent with the opinion, including evaluation of Karen L.'s depression as a severe impairment at step two and continuation through the remaining steps of the five-step sequential process. The court did not decide whether Karen L. is ultimately disabled.

CASES CITED

- Mascio v. Colvin, 780 F.3d 632, 634 (4th Cir. 2015)
- Melkonyan v. Sullivan, 501 U.S. 89 (1991)
- Taylor v. Astrue, No. BPG-11-0032, 2012 WL 294532, at *8 (D. Md. Jan. 31, 2012)
- Felton-Miller v. Astrue, 459 F. App'x 226, 230 (4th Cir. 2011)
- Evans v. Heckler, 734 F.2d 1012, 1014 (4th Cir. 1984)
- McCrea v. Commissioner of Social Security, 370 F.3d 357, 360 (3d Cir. 2004)

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