

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

Shawn S. v. Commissioner of Social Security

Case No. 2:25-cv-00014 (S.D. Ohio Feb. 5, 2026) (Report and Recommendation) · No. 2:25-cv-00014 · Decided
February 5, 2026

SUMMARY

This Report and Recommendation concerns the fourth federal action arising from Shawn S.'s application for Supplemental Security Income. The magistrate judge recommends reversing the Commissioner's unfavorable decision, awarding benefits for a closed period from September 26, 2013, through December 31, 2014, and remanding for further proceedings concerning the period beginning January 1, 2015. The recommendation addresses the evaluation of psychological evidence, residual functional capacity, and the substantial-evidence standard under 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Caroline H. Gentry
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	February 5, 2026
DOCKET	2:25-cv-00014
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Report and Recommendation on judicial review of the Commissioner's denial of Supplemental Security Income benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence. The court may not conduct a de novo review, weigh conflicting evidence, or decide credibility, but must reverse for legal error or failure to follow applicable regulations when the error prejudices the claimant.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Shawn S. v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ failed to build a logical bridge between the RFC, Dr. Lace's testimony, and the decision to discount additional limitations identified by other psychologists.
2. Whether the ALJ improperly failed to consider evidence from the entire relevant period, particularly evidence from September 26, 2013 through December 31, 2014.
3. Whether the record established entitlement to an immediate award of SSI benefits for a closed period and required further proceedings for the later period.

HOLDINGS

1. The ALJ reversibly erred by failing to explain how Dr. Lace's recommended limitations incorporated or rendered unnecessary the additional limitations identified by Drs. Sisson, Roach, Finnerty, and Zeune, including repeated instructions, increased supervision, minimal distractions, gradual implementation of changes, and flexible breaks.
2. The ALJ reversibly erred by relying heavily on later evidence and failing to adequately consider significant evidence from the period following the September 26, 2013 SSI application through December 31, 2014.
3. The record overwhelmingly established disability during the closed period, warranting an immediate award of benefits for that period.
4. An immediate award was not warranted for the period beginning January 1, 2015; the matter should be remanded for further proceedings concerning that period.

KEY QUOTATIONS

"The ALJ failed to explain how Dr. Lace's recommended limitations either included or rendered unnecessary the other psychologists' suggested limitations." (PageID 1022-1023)

"This error makes this Court unable to 'trace the path of his reasoning.'" (PageID 1022-1023)

"Because the ALJ did not account for evidence from the entire relevant time period, reversal is warranted." (PageID 1014)

"The Vocational Expert likewise testified that a worker who requires direct supervision for up to one-third of the workday would be unable to perform any competitive employment." (PageID 1070-1072)

FACTUAL BACKGROUND

Plaintiff filed an SSI application on September 26, 2013, alleging disability based largely on mental impairments including ADHD, mood disorder, impulse-control and disruptive-behavior symptoms, and learning difficulties.

Psychological evaluations in 2014 documented impaired attention, concentration, pace, impulse control, and ability to respond to workplace stress, while treatment records during the same period reflected anger, outbursts, distractibility, impaired attention, suicidal and homicidal ideation, and inconsistent medication use. The ALJ nevertheless assessed an RFC for restricted light work with simple, routine, repetitive tasks and limited social interaction, relying substantially on the testimony of medical expert Michael Lace, Psy.D.

PROCEDURAL HISTORY

Plaintiff applied for SSI in 2013, and the application was denied initially, on reconsideration, and after multiple administrative hearings. Plaintiff previously brought three actions in the Southern District of Ohio, each resulting in a Sentence Four remand to the Commissioner. After a fourth unfavorable ALJ decision, Plaintiff filed this action seeking an award of benefits or further remand. The Magistrate Judge recommended reversing the Commissioner's decision, awarding benefits for a closed period from September 26, 2013 through December 31, 2014, and remanding for further proceedings concerning the period beginning January 1, 2015.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the Commissioner's non-disability determination; remand under Sentence Four of 42 U.S.C. § 405(g) for an immediate award of benefits for the closed period from September 26, 2013 through December 31, 2014; and remand for further proceedings concerning the period beginning January 1, 2015. On remand, the ALJ should further develop and evaluate the medical-opinion evidence and determine anew whether Plaintiff was disabled under the five-step sequential analysis.

CASES CITED

- Bowen v. City of New York, 476 U.S. 467, 470 (1986)
- Koster v. Commissioner of Social Security, 643 F. App'x 466, 478 (6th Cir. 2016)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 406, 410 (6th Cir. 2009)
- Emard v. Commissioner of Social Security, 953 F.3d 844, 849 (6th Cir. 2020)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Key v. Callahan, 109 F.3d 270, 273 (6th Cir. 1997)
- Rabbers v. Commissioner of Social Security, 582 F.3d 647, 651, 654 (6th Cir. 2009)
- Cardew v. Commissioner of Social Security, 896 F.3d 742, 746 (6th Cir. 2018)
- Howard v. Commissioner of Social Security, 276 F.3d 235, 239 (6th Cir. 2002)
- Poe v. Commissioner of Social Security, 342 F. App'x 149, 156-157 (6th Cir. 2009)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 242, 249 (6th Cir. 2007)

- *Correa v. Commissioner of Social Security*, No. 1:23-cv-685, 2023 U.S. Dist. LEXIS 231766, at *31-32 (N.D. Ohio Dec. 14, 2023)
- *Stacey v. Commissioner of Social Security*, 451 F. App'x 517, 519 (6th Cir. 2011)
- *Simons v. Barnhart*, 114 F. App'x 727, 733 (6th Cir. 2004)
- *Melkonyan v. Sullivan*, 501 U.S. 89, 99 (1991)
- *Felisky v. Bowen*, 35 F.3d 1027, 1041 (6th Cir. 1994)
- *Griffin v. Astrue*, No. 3:07CV0447, 2009 U.S. Dist. LEXIS 131319, at *26-27 (S.D. Ohio Feb. 13, 2009)
- *Richardson v. Perales*, 402 U.S. 389, 408 (1977)
- *Moats v. Commissioner of Social Security*, 42 F.4th 558, 562 (6th Cir. 2022)
- *Thomas v. Arn*, 474 U.S. 140 (1985)
- *United States v. Walters*, 638 F.2d 947, 949-950 (6th Cir. 1981)

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