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

Kelley M. Kauffman v. Commissioner of Social Security

Kauffman · No. 1:25-CV-00886 · Decided April 10, 2026

SUMMARY

The United States District Court for the Northern District of Ohio overruled the Commissioner of Social Security's objection to the magistrate judge's report and recommendation. The court held that the administrative law judge failed to adequately evaluate evidence relevant to Listing 14.06, including malaise and severe fatigue, and vacated and remanded the Commissioner's decision for further proceedings.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Dan Aaron Polster
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	April 10, 2026
DOCKET	1:25-CV-00886
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The Commissioner objected under Federal Rule of Civil Procedure 72(b)(3) to a magistrate judge's report and recommendation in a Social Security disability case. The district court conducted de novo review of the portions of the report to which objection was made and reviewed the Commissioner's decision under the substantial-evidence standard.
STANDARD OF REVIEW	The district court reviewed objected-to portions of the magistrate judge's report and recommendation de novo under 28 U.S.C. § 636(b) and reviewed the Commissioner's decision to determine whether the ALJ applied the correct legal standards and whether substantial evidence supported the decision. Substantial evidence is relevant evidence that a reasonable mind might accept as adequate to support a conclusion.

PRECEDENTIAL VALUE	unpublished
PARTIES	Commissioner of Social Security

TOPICS

judicial review of agency action | administrative law | civil procedure

PRACTICE AREAS

Social Security disability | administrative law | federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the medical evidence concerning severe fatigue and malaise against the requirements of Listing 14.06.
2. Whether the ALJ's failure to analyze the evidence of malaise and explain the Listing 14.06 determination was harmless error.
3. Whether the ALJ was required to address the malaise evidence in determining Kauffman's residual functional capacity.

HOLDINGS

1. When the record raises a substantial question that a claimant may satisfy a disability listing, the ALJ must actually evaluate the evidence, compare it with the listing's requirements, and provide an explained conclusion sufficient to permit meaningful judicial review. The ALJ failed to do so regarding Kauffman's severe fatigue and malaise evidence.
2. A reviewing court may not speculate about what the ALJ might have concluded or supply a missing, determinative factual finding to uphold the agency decision.
3. An ALJ may not ignore or overlook contrary lines of evidence when determining a claimant's residual functional capacity and must consider all evidence in the case record.

KEY QUOTATIONS

> *"In order to conduct a meaningful review, the ALJ must make sufficiently clear the reasons for [their] decision."* (ECF 17 at 24)

> *"In assessing whether a claimant meets a Listing, the ALJ must 'actually evaluate the evidence,' compare it to the requirements of the relevant Listing, and provide an 'explained conclusion, in order to facilitate meaningful judicial review.'"* (ECF 17 at 24)

> *"The Court may not speculate what findings of fact the ALJ may have made had he properly considered the malaise evidence in the record."* (ECF 17 at 24-29)

FACTUAL BACKGROUND

Kauffman alleged disability beginning July 9, 2021, based in part on undifferentiated connective tissue disease and chronic severe fatigue and malaise. The ALJ found the connective tissue disease to be a severe impairment but concluded at Step 3 that it did not meet or medically equal Listing 14.06. The administrative record contained extensive references to fatigue and malaise, but the ALJ stated that malaise was not reported in the medical evidence and did not adequately analyze whether the evidence satisfied the Listing's constitutional-symptom requirements.

PROCEDURAL HISTORY

Kauffman applied for Period of Disability, Disability Insurance Benefits, and Medicare Qualified Government Employee benefits. The Social Security Administration denied the application initially and on reconsideration. After an administrative hearing, the ALJ found Kauffman not disabled and concluded that her undifferentiated connective tissue disease did not meet or medically equal Listing 14.06. Magistrate Judge Greenberg recommended vacatur and remand. The district court overruled the Commissioner's objection, adopted the report and recommendation, vacated the ALJ's decision, and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings consistent with the district court's opinion and the magistrate judge's report and recommendation, including properly evaluating the evidence of severe fatigue and malaise under Listing 14.06 and addressing the evidence in the residual-functional-capacity analysis.

CASES CITED

- Abbot v. Sullivan, 905 F.2d 918 (6th Cir. 1990)
- Aldrich v. Bock, 327 F. Supp. 2d 743 (E.D. Mich. 2004)
- Kyle v. Commissioner of Social Security, 609 F.3d 847 (6th Cir. 2010)
- White v. Commissioner of Social Security, 572 F.3d 272 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742 (6th Cir. 2007)
- Gentry v. Commissioner of Social Security, 741 F.3d 708 (6th Cir. 2014)
- Rogers v. Commissioner of Social Security, 486 F.3d 234 (6th Cir. 2007)
- DeLong v. Commissioner of Social Security Administration, 748 F.3d 723 (6th Cir. 2014)
- Bass v. McMahon, 499 F.3d 506 (6th Cir. 2007)
- Kalmbach v. Commissioner of Social Security, 409 F. App'x 852 (6th Cir. 2011)
- Wilson v. Commissioner of Social Security, 378 F.3d 541 (6th Cir. 2004)
- Harvey v. Commissioner of Social Security, 2017 WL 4216585 (6th Cir. Mar. 6, 2017)
- Reynolds v. Commissioner of Social Security, 424 F. App'x 411 (6th Cir. 2011)
- Joseph v. Commissioner of Social Security, 2018 WL 3414141 (6th Cir. July 13, 2018)

- Smith-Johnson v. Commissioner of Social Security, 579 F. App'x 426 (6th Cir. 2014)
- Gore v. Commissioner of Social Security, 2021 WL 3673196 (N.D. Ohio Aug. 19, 2021)
- Thomas v. Colvin, 826 F.3d 953 (7th Cir. 2016)
- SEC v. Chenery Corp., 332 U.S. 194 (1947)
- Fleischer v. Astrue, 774 F. Supp. 2d 875 (N.D. Ohio 2011)
- Bryan v. Commissioner of Social Security, 383 F. App'x 140 (3d Cir. 2010)

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