

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Howard William P. v. Commissioner of Social Security

Howard William P. · No. 1:24-cv-00477-AKB-DKG · Decided April 24, 2026

SUMMARY

The United States District Court for the District of Idaho adopted a magistrate judge’s Report and Recommendation and affirmed the denial of Disability Insurance Benefits. The court held that any error concerning the stooping limitation was harmless because the plaintiff’s past relevant work as a process engineer did not require stooping, and it found substantial evidence supported the ALJ’s mental residual functional capacity assessment. The action was dismissed with prejudice.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Amanda K. Brailsford
JURISDICTION	United States District Court for the District of Idaho
DECIDED	April 24, 2026
DOCKET	1:24-cv-00477-AKB-DKG
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner of Social Security's denial of Disability Insurance Benefits. After the assigned magistrate judge issued a report and recommendation recommending affirmance, Plaintiff objected, and the district court conducted de novo review of the challenged portions.
STANDARD OF REVIEW	The court reviews objected-to portions of a magistrate judge's report and recommendation de novo. The ALJ's decision must be upheld if it is supported by substantial evidence and free of legal error. Where the evidence is susceptible to more than one rational interpretation, the court defers to the ALJ's interpretation.
PRECEDENTIAL VALUE	Unknown; memorandum decision from a federal district court with no reporter citation identified.
PARTIES	Howard William P. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's failure to explain why the RFC permitted frequent stooping when a medical opinion found that Plaintiff could stoop only occasionally was harmless.
2. Whether the ALJ adequately reconciled the mild paragraph B mental limitations found at step two with an RFC containing no mental limitations.
3. Whether substantial evidence supported the ALJ's denial of Disability Insurance Benefits and whether the decision was free of legal error.

HOLDINGS

1. The ALJ erred by failing to articulate why the RFC permitted frequent stooping despite finding Dr. Spackman's opinion, which limited stooping to occasional, very persuasive; however, the error was harmless because Plaintiff's past relevant work as a process engineer does not require stooping and could be performed consistently with occasional stooping.
2. The ALJ did not commit reversible error by finding mild limitations at step two but assigning no mental limitations in the RFC because the RFC analysis considered the longitudinal record and adequately explained the RFC determination.
3. The ALJ's decision denying Disability Insurance Benefits was supported by substantial evidence and free of legal error.

KEY QUOTATIONS

“The Court agrees with the Magistrate Court’s recommended finding that the ALJ erred by failing to articulate the reason for assessing an RFC limitation for stooping that was both greater than and different from Spackman’s opinion.” (Section IV.A)

“On this record, the Court finds no inconsistency between the mental limitations identified at step two and absence of corresponding restrictions in the RFC.” (Section IV.B)

FACTUAL BACKGROUND

Plaintiff applied for Disability Insurance Benefits and alleged disability beginning September 6, 2021. The ALJ found several severe impairments but determined that none met or equaled a listed impairment, assessed an RFC for light work with restrictions, and concluded that Plaintiff could perform his past relevant work as a process engineer. The ALJ also found mild limitations in concentrating, persisting, or maintaining pace and in adapting or managing oneself, but included no corresponding mental restrictions in the RFC.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits, and the ALJ determined that he was not disabled because he could perform his past relevant work as a process engineer. The Appeals Council denied review. Plaintiff filed this action, and the magistrate judge recommended affirming the ALJ's decision. The district court overruled Plaintiff's objections, adopted the report and recommendation in full, affirmed the ALJ's decision, and dismissed the action with prejudice.

DISPOSITION

affirmed

CASES CITED

- Trevizo v. Berryhill, 871 F.3d 664, 674 (9th Cir. 2017)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Batson v. Commissioner of Social Security Administration, 359 F.3d 1190, 1193 (9th Cir. 2004)