

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Maria R. C. v. Commissioner of Social Security

No. 2:25-cv-0539 (BRM) (D.N.J. Feb. 27, 2026) · No. 2:25-cv-0539 (BRM) · Decided February 27, 2026

SUMMARY

The United States District Court for the District of New Jersey reviews the denial of Maria R. C.'s application for Disability Insurance Benefits under Title II of the Social Security Act. The court concludes that the Administrative Law Judge did not adequately explain consideration of the plaintiff's non-severe impairments in assessing her residual functional capacity. The Commissioner's decision is vacated and the matter is remanded for further consideration.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Brian R. Martinotti
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	February 27, 2026
DOCKET	2:25-cv-0539 (BRM)
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for Disability Insurance Benefits. The district court vacated the Commissioner's decision and remanded for further consideration.
STANDARD OF REVIEW	The court reviews legal issues de novo or plenary, and reviews factual findings to determine whether they are supported by substantial evidence. The court may not reweigh the evidence or substitute its factual determinations for those of the ALJ.
PRECEDENTIAL VALUE	unpublished, nonprecedential
PARTIES	Maria R. C. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- exhaustion of remedies

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ's residual-functional-capacity assessment was supported by substantial evidence and adequately explained.
2. Whether the ALJ was required to consider Plaintiff's non-severe medically determinable impairments in assessing her residual functional capacity.
3. Whether the alleged errors in the ALJ's step-two severity findings required reversal.

HOLDINGS

1. An ALJ must consider both severe and non-severe medically determinable impairments when assessing a claimant's residual functional capacity; a finding that an impairment is non-severe cannot substitute for an RFC analysis of that impairment.
2. An ALJ must explain the reasoning underlying the RFC determination sufficiently to permit meaningful judicial review, although the ALJ need not use particular language or conduct an explicit function-by-function analysis when the reasoning is otherwise apparent from the decision as a whole.
3. Any alleged error in classifying additional impairments as non-severe was harmless because the ALJ proceeded beyond step two and found in Plaintiff's favor at that step.

KEY QUOTATIONS

“Critically, the ALJ must consider both severe and non-severe impairments when assessing an individual’s RFC and the limitations considered as part of it.” (IV.A)

“However, the ALJ is not required “to use particular language or adhere to a particular format in conducting his analysis,” and the ALJ’s decision must be “read as a whole” to determine whether he considered the appropriate factors in reaching his conclusion.” (IV.A)

“But “an ALJ may not rely on a finding of non-severity as a substitute for an RFC analysis.”” (IV.A)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning January 1, 2021, based on various physical impairments, including chronic ischemic heart disease, asthma, vertigo, peripheral neuropathy, diabetes, hypertension, vision loss, sleep apnea, and GERD. The ALJ found four impairments severe and classified the remaining conditions as non-severe. The ALJ assessed an RFC for a restricted range of light work and found Plaintiff capable of performing her past relevant work as a residential supervisor. The district court determined that the ALJ's RFC analysis focused primarily on the severe impairments and did not meaningfully explain whether the non-severe impairments affected the RFC.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits in October 2022. An administrative law judge denied the application on February 8, 2024, and the Appeals Council denied review on November 21, 2024, making the

ALJ's decision final. Plaintiff filed this action on January 15, 2025. The district court concluded that the ALJ did not adequately consider Plaintiff's non-severe impairments in assessing her residual functional capacity and remanded the matter.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner's decision is vacated, and the matter is remanded for further consideration. The ALJ must consider Plaintiff's non-severe impairments in assessing the RFC.

CASES CITED

- Matthews v. Apfel, 239 F.3d 589, 592 (3d Cir. 2001)
- Knepp v. Apfel, 204 F.3d 78, 83 (3d Cir. 2000)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Newhouse v. Heckler, 753 F.2d 283, 285 (3d Cir. 1985)
- Newell v. Commissioner of Social Security, 347 F.3d 541, 545 (3d Cir. 2003)
- Biestek v. Berryhill, 587 U.S. 97, 102–03 (2019)
- Daring v. Heckler, 727 F.2d 64, 70 (3d Cir. 1984)
- Chandler v. Commissioner of Social Security, 667 F.3d 356, 359 (3d Cir. 2011)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Bowen v. Yuckert, 482 U.S. 137, 140–41, 146 n.5 (1987)
- Plummer v. Apfel, 186 F.3d 422, 428 (3d Cir. 1999)
- Williams v. Sullivan, 970 F.2d 1178, 1186 (3d Cir. 1992)
- Burnett v. Commissioner of Social Security, 220 F.3d 112, 120–21 (3d Cir. 2000)
- Sykes v. Apfel, 228 F.3d 259, 262–63 & n.2 (3d Cir. 2000)
- Holloman v. Commissioner of Social Security, 639 F. App'x 810, 814 (3d Cir. 2016)
- Lippincott v. Commissioner of Social Security, 982 F. Supp. 2d 358, 380–81 (D.N.J. 2013)
- Powers v. Commissioner of Social Security, Civ. A. No. 19-21970, 2021 WL 1207793, at *7 (D.N.J. Mar. 31, 2021)
- Schaudeck v. Commissioner of Social Security, 181 F.3d 429, 431 (3d Cir. 1999)
- Jones v. Barnhart, 364 F.3d 501, 503, 505 (3d Cir. 2004)
- Fitzpatrick v. Commissioner of Social Security, Civ. A. No. 19-7608, 2020 WL 1872978, at *4–6 (D.N.J. Apr. 15, 2020)
- Deranie A. v. Commissioner of Social Security, Civ. A. No. 23-03157, 2024 WL 3665811, at *7 (D.N.J. Aug. 5, 2024)
- Glass v. Commissioner of Social Security, Civ. A. No. 18-15279, 2019 WL 5617508, at *8 (D.N.J. Oct. 31, 2019)

- Salles v. Commissioner of Social Security, 229 F. App'x 140, 145 n.2 (3d Cir. 2007)
- Williams v. Commissioner of Social Security Administration, Civ. A. No. 12-5637, 2013 WL 4500335, at *18 n.7 (D.N.J. Aug. 21, 2013)
- Auriemma v. Colvin, Civ. A. No. 13-5947, 2015 WL 5097902, at *6 (D.N.J. Aug. 31, 2015)
- McCleave v. Commissioner of Social Security, Civ. A. No. 08-1673, 2009 WL 3497775, at *11 (E.D. Pa. Oct. 28, 2009)
- Kich v. Colvin, 218 F. Supp. 3d 342, 355 (M.D. Pa. 2016)
- Das v. Commissioner of Social Security, No. 22-3229, 2023 WL 6157395, at *4 (3d Cir. Sept. 21, 2023)
- Carratura v. Saul, Civ. A. No. 20-05483, 2021 WL 4077565, at *7 n.4 (D.N.J. Sept. 8, 2021)

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