

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Arneatha S. v. Commissioner of Social Security

No. 24-CV-06187-FPG (W.D.N.Y. Mar. 25, 2026) · No. 24-CV-06187-FPG · Decided March 25, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the Commissioner of Social Security’s denial of Arneatha S.’s application for Supplemental Security Income. The court held that the ALJ adequately evaluated the medical opinions, developed the administrative record, and supported the residual functional capacity determination with substantial evidence. Plaintiff’s motion for judgment on the pleadings was denied, the Commissioner’s motion was granted, and the complaint was dismissed with prejudice.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Frank P. Geraci, Jr.
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 25, 2026
DOCKET	24-CV-06187-FPG
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. §§ 405(g) and 1383(c)(3) of the Commissioner's final decision denying Supplemental Security Income benefits. Both parties moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether it is supported by substantial evidence and based on the correct legal standard; review is not de novo.
PRECEDENTIAL VALUE	nonprecedential district court decision
PARTIES	Arneatha S. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security law

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained why limitations in Dr. Brownfeld's persuasive opinion concerning regulation of emotions, control of behavior, and maintenance of well-being were not expressly incorporated into the RFC.
2. Whether the ALJ failed to develop the administrative record by not obtaining allegedly missing functional assessments from Plaintiff's primary care provider.
3. Whether the ALJ properly evaluated Dr. Toor's medical opinion under the supportability and consistency factors.
4. Whether the Commissioner's denial of SSI was supported by substantial evidence and based on the correct legal standard.

HOLDINGS

1. The ALJ did not err by finding Dr. Brownfeld's opinion persuasive while limiting Plaintiff to unskilled, low-stress occupations involving simple routine tasks and few workplace changes. That RFC limitation was consistent with moderate limitations in regulating emotions, controlling behavior, and maintaining well-being.
2. Remand was not warranted because the record did not contain an actual, obvious gap requiring further development, and Plaintiff's argument that the missing functional assessments might have supported greater limitations was speculative.
3. The ALJ's evaluation of Dr. Toor's opinion was adequate, and any failure to expressly discuss the supportability and consistency factors was harmless because the court could glean the ALJ's rationale from the decision.
4. The Commissioner's decision denying SSI was supported by substantial evidence and was based on the correct legal standard.

KEY QUOTATIONS

"In reviewing a final decision of the SSA, this Court is limited to determining whether the SSA's conclusions were supported by substantial evidence in the record and were based on a correct legal standard." (at 2)

"Thus, when the evidence of record is inadequate to determine whether a claimant is disabled, 'the ALJ has an obligation to seek additional information to supplement the record.'" (at 7)

"Consequently, remand is not warranted on this basis that the ALJ did not discuss the supportability and consistency factors when evaluating Dr. Toor's opinion." (at 9)

FACTUAL BACKGROUND

Plaintiff alleged disability based on physical and mental impairments, including degenerative conditions affecting her back and knees, asthma, cardiac issues, anxiety, depression, bipolar disorder, insomnia, and schizophrenia. The ALJ found several severe impairments, but determined that none met or medically equaled a listed impairment. The ALJ assessed an RFC for light work with additional exertional and environmental limitations, including unskilled, low-stress work involving simple routine tasks and few workplace changes, and found that jobs existed in significant numbers that Plaintiff could perform.

PROCEDURAL HISTORY

Plaintiff applied for SSI in March 2021. The application was denied initially and on reconsideration, and an administrative hearing was held on September 9, 2022. The ALJ found Plaintiff not disabled on November 29, 2022; the Appeals Council denied review on January 30, 2024. The district court denied Plaintiff's motion for judgment on the pleadings, granted the Commissioner's motion, dismissed the complaint with prejudice, and directed entry of judgment.

DISPOSITION

dismissed

CASES CITED

- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir. 2012)
- Moran v. Astrue, 569 F.3d 108, 112 (2d Cir. 2009)
- Schaal v. Apfel, 134 F.3d 496, 501 (2d Cir. 1998)
- Wagner v. Secretary of Health & Human Services, 906 F.2d 856, 860 (2d Cir. 1990)
- Bowen v. City of New York, 476 U.S. 467, 470-71 (1986)
- Rosa v. Callahan, 168 F.3d 72, 77, 79 n.5 (2d Cir. 1999)
- Jacqueline L. v. Commissioner of Social Security, 515 F. Supp. 3d 2, 12 (W.D.N.Y. 2021)
- Zabala v. Astrue, 595 F.3d 402, 410 (2d Cir. 2010)
- Washburn v. Colvin, 286 F. Supp. 3d 561, 566 (W.D.N.Y. 2017)
- Pratts v. Chater, 94 F.3d 34, 37 (2d Cir. 1996)
- Jennifer M. v. O'Malley, No. 23-CV-494, 2024 WL 5378976, at *4-*5 (N.D.N.Y. July 23, 2024)
- Reginald R. v. Commissioner of Social Security, No. 21-CV-06326, 2023 WL 5608869, at *16 (W.D.N.Y. Aug. 30, 2023)
- Dale A.M. v. Commissioner of Social Security, No. 19-CV-1150, 2021 WL 1175160, at *12 (N.D.N.Y. Mar. 29, 2021)
- Loucks v. Kijakazi, No. 21-1749, 2022 WL 2189293, at *2 (2d Cir. June 17, 2022)
- Berry v. Schweiker, 675 F.2d 464, 469 (2d Cir. 1982)
- Davidia B. v. Commissioner of Social Security, No. 21-CV-384, 2023 WL 5361000, at *5 (W.D.N.Y. Aug. 22, 2023)

