

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND,
SOUTHERN DIVISION

Heidy C.G. o/b/o A.C.C. v. Commissioner, Social Security

Heidy C.G. · No. GLS-24-03687 · Decided March 26, 2026

SUMMARY

The United States District Court for the District of Maryland reviewed the denial of children's supplemental security income benefits to A.C.C. The court held that the Administrative Law Judge inadequately analyzed evidence concerning the claimant's standardized test scores and functioning in the domain of acquiring and using information, reversed the decision in part, and remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland, Southern Division
WRITING FOR THE COURT	Gina L. Simms
JURISDICTION	United States District Court for the District of Maryland, Southern Division
DECIDED	March 26, 2026
DOCKET	GLS-24-03687
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying children's supplemental security income benefits.
STANDARD OF REVIEW	The court must uphold the Commissioner's decision if it is supported by substantial evidence and the Agency applied proper legal standards. Substantial evidence is more than a mere scintilla but may be less than a preponderance. The court may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for that of the Agency.
PRECEDENTIAL VALUE	Unpublished district court opinion; precedential status unknown
PARTIES	Heidy C.G. o/b/o A.C.C. v. Commissioner, Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the claimant's limitations in acquiring and using information when determining that the claimant's impairments did not functionally equal a listed impairment.
2. Whether the ALJ adequately evaluated the claimant's subjective complaints.
3. Whether the ALJ properly developed the administrative record.

HOLDINGS

1. The ALJ committed reversible error by failing to address the claimant's standardized test scores and explain the weight given to that evidence when assessing the claimant's functioning in acquiring and using information.
2. The Commissioner's decision was reversed in part and the case was remanded for further proceedings because of inadequate analysis.

KEY QUOTATIONS

“The Court agrees. The Commissioner “must consider all the evidence and explain on the record the reasons for his findings, including the reason for rejecting relevant evidence in support of the claim.”” (at 5)

“Here, the ALJ’s failure to address the claimant’s test scores in assessing the claimant’s functioning in acquiring and using information and to explain the weight given to this evidence warrants remand, as the “inadequacies in the ALJ’s analysis frustrate meaningful review.”” (at 5)

“On remand, the ALJ should provide a proper analysis that builds “an accurate and logical bridge” between the evidence and the claimant’s capacity to perform activities across the six domains of functioning.” (at 5)

FACTUAL BACKGROUND

A.C.C., a school-age child, alleged disability beginning September 29, 2017, based principally on ADHD, oppositional defiant disorder, and a learning disorder. Testing in January 2020 produced a full-scale IQ score of 69, placing the claimant in the extremely low range of overall cognitive functioning. School records described substantial academic difficulties, including performance more than three grade levels behind in reading, mathematics, and written language, placement in a self-contained special education classroom, and failure of nearly all subjects. The ALJ found a marked limitation in attending and completing tasks but less-than-marked limitations in acquiring and using information and the other relevant domains, concluding that the impairments did not functionally equal a listed impairment.

PROCEDURAL HISTORY

Plaintiff applied for children's supplemental security income on behalf of A.C.C. The claim was denied initially and on reconsideration, and an ALJ found the claimant not disabled on March 2, 2021. The Appeals Council vacated that decision and remanded for further proceedings. After a second hearing, the ALJ again found the claimant not disabled on May 22, 2024, and the Appeals Council denied review on October 22, 2024. The district court reversed the Commissioner's decision in part and remanded for further proceedings under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ must provide a proper analysis that builds an accurate and logical bridge between the evidence and the claimant's capacity to perform activities across the six domains of functioning, including addressing the claimant's test scores and explaining the weight given to relevant evidence. The court expressed no opinion on the ultimate disability determination.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- King v. Califano, 615 F.2d 1018, 1020 (4th Cir. 1980)
- Gordon v. Schweiker, 725 F.2d 231, 235 (4th Cir. 1984)
- Lewis v. Berryhill, 858 F.3d 858, 868-69 (4th Cir. 2017)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)
- Radford v. Colvin, 734 F.3d 288, 295 (4th Cir. 2013)
- Mascio v. Colvin, 780 F.3d 632, 636 (4th Cir. 2015)
- Cichocki v. Astrue, 729 F.3d 172, 177 (2d Cir. 2013) (per curiam)
- Tameisha M. ex rel. T.M. v. Berryhill, 340 F. Supp. 3d 573, 578 (W.D. Va. 2018)
- Owens ex rel. A.O. v. Colvin, Civ. No. 11-3204, 2014 WL 2882948, at *7 (D. Md. June 24, 2014)
- Nancy G. v. Kijakazi, Civ. No. GLS 20-3440, 2022 WL 363824, at *5 (D. Md. Feb. 4, 2022)