

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Sylvia Denise James v. Commissioner of Social Security

James · No. 1:25-CV-0468 · Decided January 26, 2026

SUMMARY

This Report and Recommendation addresses Sylvia Denise James’s challenge to the Commissioner of Social Security’s denial of Disability Insurance Benefits. The magistrate judge recommends vacating the Commissioner’s decision and remanding under sentence four of 42 U.S.C. § 405(g), finding that the ALJ inadequately evaluated Plaintiff’s mental impairments at Steps Two and Four and failed to provide an accurate and logical bridge between the evidence and the conclusions.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	Amanda M. Knapp
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	January 26, 2026
DOCKET	1:25-CV-0468
DISPOSITION	other
PROCEDURAL POSTURE	Report and Recommendation on a claimant's appeal under 42 U.S.C. § 405(g) from the Commissioner's denial of Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal standards and whether the ALJ's factual findings are supported by substantial evidence. The court may not try the case de novo, resolve conflicts in the evidence, or decide credibility questions, but the ALJ must consider the record as a whole, follow applicable regulations, and build an accurate and logical bridge between the evidence and the result.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Sylvia Denise James v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

mental impairments and residual functional capacity

QUESTIONS PRESENTED

1. Whether the ALJ's Step Two finding that James's mental impairments were non-severe was supported by substantial evidence.
2. Whether the ALJ adequately considered James's mental impairments in formulating the residual functional capacity at Step Four.
3. Whether the ALJ's explanation accurately characterized the record and built an accurate and logical bridge between the evidence and the conclusions.

HOLDINGS

1. The magistrate judge recommended finding that the ALJ's Step Two analysis was not supported by substantial evidence because the ALJ relied on work activity without addressing evidence that mental-health symptoms led to termination from that job and similar work, and mischaracterized the record as showing that James declined mental-health referrals.
2. The magistrate judge recommended finding that the ALJ inadequately explained whether and how James's mental impairments were considered in the RFC, requiring vacatur and remand for further proceedings.

KEY QUOTATIONS

“The undersigned therefore concludes that the ALJ’s finding that Plaintiff “declined referrals for mental health treatment”—based on record that shows Plaintiff both requested a referral for mental health treatment and completed that treatment as scheduled—effectively mischaracterized the evidentiary record.” (Tr. 20-21)

“Because it is unclear whether or how the ALJ factored the missing and/or mischaracterized evidence into her findings at Step Two of the sequential analysis, it is also unclear whether or how the ALJ weighed the same evidence in developing the RFC at Step Four.” (Tr. 20-21)

“Accordingly, the undersigned finds that Plaintiff’s sole assignment of error has merit and recommends that the Court vacate and remand ALJ’s decision for further proceedings consistent with this Report and Recommendation.” (Tr. 20-21)

FACTUAL BACKGROUND

James alleged disability based in part on depression, severe anxiety, PTSD-related symptoms, and neuropathy. During the relevant period, she underwent a military-sexual-trauma intake assessment and participated in a VA

Courage therapy group, while records also reflected anger, difficulty concentrating, interpersonal problems, and reported termination from work involving children because of absence or aggression. The ALJ characterized James's mental impairments as non-severe and relied on her work activity, intact mental-status findings, and an apparent notation that she declined a referral. The magistrate judge concluded that this reasoning omitted or mischaracterized material evidence, including evidence that James requested and completed mental-health treatment and that mental-health symptoms allegedly contributed to job termination.

PROCEDURAL HISTORY

James applied for Disability Insurance Benefits, alleging disability beginning June 30, 2021. The Commissioner denied the application initially and on reconsideration; following an April 1, 2024 hearing, the ALJ issued an unfavorable decision on April 25, 2024. The Appeals Council denied review on January 29, 2025, and James filed this action on March 7, 2025. The magistrate judge recommended that the Commissioner's decision be vacated and remanded for further proceedings because the ALJ inadequately evaluated James's mental impairments at Steps Two and Four.

DISPOSITION

other

REMAND INSTRUCTIONS

Vacate and remand under sentence four of 42 U.S.C. § 405(g). On remand, the ALJ should consider the entire record, accurately discuss the evidence, clearly articulate the rationale for the Step Two and Step Four findings concerning James's mental impairments, and ensure that the rationale builds an accurate and logical bridge between the evidence and the result.

CASES CITED

- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 405-06 (6th Cir. 2009)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 535 (6th Cir. 2001)
- Besaw v. Secretary of Health & Human Services, 966 F.2d 1028, 1030 (6th Cir. 1992)
- Brainard v. Secretary of Health & Human Services, 889 F.2d 679, 681 (6th Cir. 1989)
- McClanahan v. Commissioner of Social Security, 474 F.3d 830, 833 (6th Cir. 2006)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Rabbers v. Commissioner of Social Security Administration, 582 F.3d 647, 651 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)
- Wilson v. Commissioner of Social Security, 378 F.3d 541, 546-47 (6th Cir. 2004)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877, 881 (N.D. Ohio 2011)
- Sarchet v. Chater, 78 F.3d 305, 307 (7th Cir. 1996)

- *Foster v. Secretary of Health & Human Services*, 899 F.2d 1221, at *2 (6th Cir. 1990) (unpublished table decision)
- *Murphy v. Secretary of Health & Human Services*, 801 F.2d 182, 185 (6th Cir. 1986)
- *Griffeth v. Commissioner of Social Security*, 217 F. App'x 425, 428 (6th Cir. 2007)
- *Long v. Apfel*, 1 F. App'x 326, 330-32 (6th Cir. 2001)
- *Avers v. Kijakazi*, No. 3:20-CV-01433, 2021 WL 4291228, at *9 (N.D. Ohio Sept. 21, 2021)
- *Anthony v. Astrue*, 266 F. App'x 451, 457 (6th Cir. 2008)
- *Farris v. Secretary of Health & Human Services*, 773 F.2d 85, 89 (6th Cir. 1985)
- *Maziarz v. Secretary of Health & Human Services*, 837 F.2d 240, 244 (6th Cir. 1987)
- *Pompa v. Commissioner of Social Security*, 73 F. App'x 801, 803 (6th Cir. 2003)
- *Simpson v. Commissioner of Social Security*, 344 F. App'x 181, 190-91 (6th Cir. 2009)
- *Napier v. Commissioner of Social Security*, 127 F.4th 1000 (6th Cir. 2025)
- *Boseley v. Commissioner of Social Security Administration*, 397 F. App'x 195, 199 (6th Cir. 2010)
- *Kornecky v. Commissioner of Social Security*, 167 F. App'x 496, 507-08 (6th Cir. 2006) (per curiam)
- *Minor v. Commissioner of Social Security*, 513 F. App'x 417, 435 (6th Cir. 2013)
- *Germany-Johnson v. Commissioner of Social Security*, 313 F. App'x 771, 777 (6th Cir. 2008)
- *Young v. Commissioner of Social Security*, 351 F. Supp. 2d 644, 649 (E.D. Mich. 2004)
- *Berkshire v. Beauvais*, 928 F.3d 520, 530 (6th Cir. 2019)
- *Thomas v. Arn*, 474 U.S. 140 (1985)