

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Ashley B. v. Frank Bisignano, Commissioner, Social Security Administration

Ashley B. v. Bisignano, Civil No. 25-0376-DRM (D. Md. Mar. 26, 2026) · No. Civil No. 25-0376-DRM · Decided March 26, 2026

SUMMARY

The United States District Court for the District of Maryland reversed the Commissioner of Social Security’s denial of Ashley B.’s claim for Disability Insurance Benefits and remanded for further proceedings. The court held that the Administrative Law Judge inadequately analyzed whether the plaintiff’s bladder issues, including alleged neurogenic bladder and related bathroom-break limitations, constituted a medically determinable impairment and whether they should be considered in the residual functional capacity assessment. The court expressed no opinion on the ultimate entitlement to benefits.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Douglas R. Miller
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 26, 2026
DOCKET	Civil No. 25-0376-DRM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner’s final decision denying her claim for Social Security Disability Insurance benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ’s factual findings are supported by substantial evidence and whether the ALJ applied the correct legal standards. Substantial evidence is evidence that a reasoning mind would accept as sufficient to support a conclusion; it is more than a scintilla but may be less than a preponderance.
PRECEDENTIAL VALUE	unknown
PARTIES	Ashley B. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately analyzed whether Plaintiff's bladder symptoms, including alleged neurogenic bladder and urinary urgency, constituted a medically determinable impairment.
2. Whether the ALJ adequately considered Plaintiff's bladder-related symptoms and alleged need for additional bathroom breaks in assessing residual functional capacity.
3. Whether the ALJ's inadequate analysis was harmless because the ALJ found at least one other severe impairment and proceeded through the remaining steps.

HOLDINGS

1. The ALJ's analysis was inadequate because the decision did not explain why Plaintiff's bladder issues did not constitute a medically determinable impairment and relied primarily on the absence of urologist treatment without adequately addressing the evidence in the record.
2. The error was not harmless because the ALJ did not adequately consider Plaintiff's bladder issues or possible neurogenic bladder at any step of the sequential evaluation.

KEY QUOTATIONS

"The ALJ did not provide an adequate analysis for the determination that Plaintiff's bladder issues, including her alleged neurogenic bladder, did not constitute a medically determinable impairment." (March 26, 2026, page 4)

"The Court expresses no opinion about whether Plaintiff has a bladder issue which constitutes a medically determinable impairment. The ALJ's error was to provide inadequate analysis about how the finding was reached." (March 26, 2026, page 5)

"Because an ALJ may only consider medically determinable impairments when assessing RFC, the ALJ's errors were not harmless." (March 26, 2026, page 6)

FACTUAL BACKGROUND

Plaintiff alleged disability based on multiple sclerosis, migraines, depression, anxiety, and bladder-related symptoms, including urinary urgency and the need for additional bathroom breaks. The ALJ found several severe impairments, determined that Plaintiff retained the capacity for a restricted range of light work, and concluded that she could perform jobs existing in significant numbers in the national economy. In addressing the bladder issue, the ALJ stated that there was no urologist treatment to support a medically determinable impairment and declined to find that Plaintiff required extra breaks.

PROCEDURAL HISTORY

Plaintiff filed a Title II application for Disability Insurance Benefits alleging disability beginning August 9, 2019. The claim was denied initially and on reconsideration; following an August 23, 2023 hearing, an ALJ found Plaintiff not disabled, and the Appeals Council denied review. Plaintiff then sought review in the District of Maryland, which reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded for further proceedings and adequate explanation of the analysis concerning Plaintiff's bladder issues and possible neurogenic bladder, including whether the condition is a medically determinable impairment and its effect, if any, on the RFC and disability determination. The court did not direct a particular ultimate result.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Kiser v. Saul, 821 F. App'x 211, 212 (4th Cir. 2020)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439-40 (4th Cir. 1997)
- DeLoatch v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Kareem H. v. O'Malley, 23-1493-CDA, 2024 WL 3378016 (D. Md. July 11, 2024)
- Jackie T. v. Kijakazi, 22-1309-BAH, 2023 WL 1424573 (D. Md. Jan. 30, 2023)
- Lauren C. M. v. Kijakazi, SAG-23-0220, 2023 WL 6311286 (D. Md. Sept. 28, 2023)
- Bates v. Berryhill, 726 F. App'x 959, 960 (4th Cir. 2018)
- King v. Califano, 599 F.2d 597, 599 (4th Cir. 1979)
- Ruth B. v. Kijakazi, No. 20-457, 2021 WL 8527625, at *5 (W.D. Va. Oct. 29, 2021)
- Mascio v. Colvin, 780 F.3d 632, 636-37 (4th Cir. 2015)
- Crystal S. v. Kijakazi, MJM-20-3717, 2022 WL 4539717, at *3 (D. Md. Sept. 28, 2022)