

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS

Matthew Stephen Snow v. Social Security Administration,
Commissioner

Snow · No. 4:25-CV-00423-JM-ERE · Decided January 20, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas affirmed the Social Security Administration Commissioner’s denial of Matthew Snow’s application for disability benefits. The court held that the ALJ properly evaluated the opinions of treating therapist APRN Danielle Jenkins and that the decision was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas
JURISDICTION	United States District Court for the Eastern District of Arkansas
DECIDED	January 20, 2026
DOCKET	4:25-CV-00423-JM-ERE
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's final decision denying an application for disability benefits.
STANDARD OF REVIEW	The court reviewed the Commissioner's decision for legal error and determined whether it was supported by substantial evidence on the record as a whole. Substantial evidence means enough evidence that a reasonable mind would find adequate to support the ALJ's decision.
PRECEDENTIAL VALUE	Unknown
PARTIES	Matthew Stephen Snow v. Social Security Administration, Commissioner

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication
- ada / disability

PRACTICE AREAS

- Social Security disability
- administrative law
- federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated and explained the reasons for finding Danielle Jenkins's opinions regarding Snow's mental limitations unpersuasive.
2. Whether substantial evidence supported the Commissioner's final decision denying disability benefits.

HOLDINGS

1. The ALJ did not err in finding Jenkins's opinions unpersuasive because the ALJ identified adequate support in the record, including inconsistencies with Jenkins's treatment notes and examinations, Snow's reported improvement, and Snow's activities of daily living.
2. The Commissioner's decision denying benefits was supported by substantial evidence and applied proper legal standards.

KEY QUOTATIONS

““Substantial evidence” in this context means “enough that a reasonable mind would find [the evidence] adequate to support the ALJ’s decision.”” (2/7)

“The Court will not reverse the Commissioner’s decision “merely because substantial evidence exists for the opposite decision.”” (2/7)

“The ALJ applied proper legal standards in evaluating Mr. Snow’s claims, and substantial evidence supports the decision to deny benefits.” (2/7)

FACTUAL BACKGROUND

Snow alleged disability based on depression, attention deficit disorder, bipolar disorder, autism, post-traumatic stress disorder, and a nervous breakdown. The ALJ found severe impairments including generalized anxiety disorder, PTSD, depression, autism, and agoraphobia, but determined that Snow retained the residual functional capacity for work at all exertional levels subject to mental and social limitations. A vocational expert identified jobs available in significant numbers that Snow could perform. The ALJ discounted treating provider Danielle Jenkins's marked-limitations opinions as unsupported, inconsistent with treatment notes and examinations, and inconsistent with Snow's activities of daily living.

PROCEDURAL HISTORY

Snow applied for disability benefits in 2022. His claim was denied initially and on reconsideration; following a hearing on April 10, 2024, an administrative law judge found that he was not disabled. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Snow appealed to the district court, challenging the ALJ's evaluation of treating provider Danielle Jenkins's opinions.

DISPOSITION

affirmed

CASES CITED

- Brown v. Colvin, 825 F.3d 936, 939
- Halverson v. Astrue, 600 F.3d 922, 929
- Slusser v. Astrue, 557 F.3d 923, 925
- Milam v. Colvin, 794 F.3d 978, 983
- Long v. Chater, 108 F.3d 185, 187
- Prosch v. Apfel, 201 F.3d 1010, 1013-14
- House v. Astrue, 500 F.3d 741, 744
- Duvall v. Bisignano, No. 4:25-cv-00120 KGB-PSH, 2025 WL 1812626, n.6 (E.D. Ark. July 1, 2025)
- Locher v. Sullivan, 968 F.2d 725, 728

OPINION

Snow

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

MATTHEW STEPHEN SNOW PLAINTIFF

V. No. 4:25-CV-00423-JM-ERE

SOCIAL SECURITY ADMINISTRATION,

Commissioner DEFENDANT

ORDER¹

Plaintiff Matthew Snow appeals the Social Security Administration Commissioner's final decision denying his application for disability benefits. For the reasons set out below, the Commissioner's decision is **AFFIRMED**. I. Background In 2022, Mr. Snow filed an application for benefits due to depression, attention deficit disorder, bipolar disorder, autism, post-traumatic stress disorder ("PTSD"), and a nervous breakdown. Tr. 13, 190, 200, 249. Mr. Snow's claim was denied initially and upon reconsideration. At Mr. Snow's request, an Administrative Law Judge ("ALJ") held a hearing on April 10, 2024, where Mr. Snow appeared with his lawyer, and the ALJ heard testimony from Mr. Snow and a vocational expert ("VE"). Tr. 29-62. On May 21, 2024, the ALJ issued a decision finding that Mr. Snow was not disabled. Tr. 13-23. The Appeals 1 The parties consented in writing to the jurisdiction of a United States Magistrate Judge. Doc. 13. Council denied Mr. Snow's request for review, making the ALJ's decision the Commissioner's final decision. Tr. 1-3. Mr. Snow, who was forty-seven years old at the time of the hearing, attended some college and has past relevant work experience as an assistant manager and in fragrance retail sales. Tr. 21, 55. II. The ALJ's Decision² The ALJ found that Mr. Snow had not engaged in substantial gainful activity since the alleged onset date of March 10, 2020. Tr. 15. The ALJ also concluded that Mr. Snow had the following severe impairments: generalized anxiety disorder, PTSD, depression, autism, and agoraphobia. *Id.* However, the ALJ concluded that Mr. Snow did

not have an impairment or combination of impairments that met or equaled an impairment listed in 20 C.F.R. Part 404, Subpart P, Appendix 1. Tr. 16. According to the ALJ, Mr. Snow had the residual functional capacity (“RFC”) to perform the full range of work at all exertional levels, with the following limitations: (1) only simple tasks with simple work instructions and procedures; (2) 2 The ALJ followed the required sequential analysis to determine: (1) whether the claimant was engaged in substantial gainful activity; (2) if not, whether the claimant had a severe impairment; (3) if so, whether the impairment (or combination of impairments) met or equaled a listed impairment; and (4) if not, whether the impairment (or combination of impairments) prevented the claimant from performing past relevant work; and (5) if so, whether the impairment (or combination of impairments) prevented the claimant from performing any other jobs available in significant numbers in the national economy. 20 C.F.R. § 404.1520(a)-(g); 20 C.F.R. § 416.920(a)-(g). can adapt to changes in work that are simple, predictable, and easily explained; and (3) only occasional contact with co-workers, supervisors, and the public. Tr. 18.

In response to hypothetical questions incorporating the above limitations, the VE testified that a substantial number of potential jobs were available in the national economy that Mr. Snow could perform, including laundry worker and cleaner. Tr. 22, 59. Accordingly, the ALJ determined that Mr. Snow was not disabled. III. Discussion A. Standard of Review In this appeal, the Court must review the Commissioner’s decision for legal error and determine whether the decision is supported by substantial evidence on the record as a whole. *Brown v. Colvin*, 825 F.3d 936, 939 (8th Cir. 2016) (citing *Halverson v. Astrue*, 600 F.3d 922, 929 (8th Cir. 2010)). “Substantial evidence” in this context means “enough that a reasonable mind would find [the evidence] adequate to support the ALJ’s decision.” *Slusser v. Astrue*, 557 F.3d 923, 925 (8th Cir. 2009) (citation omitted). In making this determination, the Court must consider not only evidence that supports the Commissioner’s decision, but also evidence that supports a contrary outcome. *Milam v. Colvin*, 794 F.3d 978, 983 (8th Cir. 2015). The Court will not reverse the Commissioner’s decision, however, “merely because substantial evidence exists for the opposite decision.” *Long v. Chater*, 108 F.3d 185, 187 (8th Cir. 1997) (citation omitted). B. Mr. Snow’s Arguments for Reversal Mr. Snow contends that the Commissioner’s decision is not supported by substantial evidence because the ALJ failed to properly evaluate and explain the reasons for finding treating therapist APRN Danielle Jenkins’ opinions unpersuasive. Doc. 9. After carefully considering the record as a whole, I affirm the Commissioner. C. Analysis Mr. Snow alleges that the ALJ erred when addressing Nurse Jenkins’ opinions regarding his mental impairments. *Id.* Mr. Snow points out that Nurse Jenkins indicated on a medical opinion questionnaire that he has marked limitations related to sustained concentration and persistence, social interaction, and adaptation. Doc. 9, Tr. 740-741. She also provided a paragraph summary of Mr. Snow’s mental impairments and their affect on his activities of daily living. Tr. 741. However, the ALJ found that Nurse Jenkins’ opinions were not persuasive because they were: not supported by or consistent with the record; vague; contradicted by the mental exams she performed; and inconsistent with Mr. Snow’s

activities of daily living. Tr. 21. The ALJ then pointed to numerous places in the record supporting these findings. For example, Nurse Jenkins' treatment notes repeatedly indicated unremarkable, normal behavior and thought content by Mr. Snow as well as his reports to Nurse Jenkins that he was doing "alright." Tr. 509, 533, 562, 566, 574, 578, 583, 588, 610, 622, 660. A treatment provider's statements may be discounted if they are inconsistent with the overall assessment of the treatment provider or the opinions of others, especially where the other opinions are supported by more or better medical evidence. *Prosch v. Apfel*, 201 F.3d 1010, 1013-14 (8th Cir. 2007); *House v. Astrue*, 500 F.3d 741, 744 (8th Cir. 2007) (an ALJ is not required to give controlling weight to the opinion of a treating physician if the opinion is inconsistent with the other substantial evidence in the record). The ALJ properly noted that Mr. Snow was never psychiatrically hospitalized for his mental impairments and that "treatment and therapy were regular in nature without reports of exacerbation" Tr. 19. In fact, Mr. Snow advised Nurse Jenkins that he was improving with therapy and medication. Tr. 563. Improvement in condition supports an ALJ's finding that a claimant is not disabled. See *Duvall v. Bisignano*, No. 4:25-cv-00120 KGB-PSH, 2025 WL 1812626, n.6 (E.D. Ark. July 1, 2025); see *Locher v. Sullivan*, 968 F.2d 725, 728 (8th Cir. 1992). The ALJ also noted an inconsistency between Nurse Jenkins' finding on March 4, 2024 that Mr. Snow could not drive, and Mr. Snow's April 10, 2024 hearing testimony that he can drive, though it stresses him out. Tr. 21, 45, 608. The ALJ found that Mr. Snow's activities of daily living (rescuing kittens, online gaming, using social media, writing song lyrics, etc.) far exceeded the marked limitations indicated by Nurse Jenkins. Tr. 21, 617, 624, 636, 648, 699, 702, 716. Ultimately, the ALJ found that the overall record "shows function greatly in excess of what was opined" by Nurse Jenkins. 77. 2/7. Although Mr. Snow clearly has mental impairments, the Court will not reverse the Commissioner's decision "merely because substantial evidence exists for the opposite decision." *Long*, 108 F.3d at 187. The ALJ did not err in his assessment of Nurse Jenkins' opinions. IV. Conclusion The ALJ applied proper legal standards in evaluating Mr. Snow's claims, and substantial evidence supports the decision to deny benefits. IT IS THEREFORE ORDERED that the Commissioner's decision is affirmed, and judgment will be entered accordingly. Dated 20 January 2026.