

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Jeffrey Hairston v. Commissioner of Social Security

Hairston v. Commissioner of Social Security · No. 1:25-CV-02264-PAB · Decided April 27, 2026

SUMMARY

A United States magistrate judge recommends affirming the Commissioner of Social Security’s denial of Jeffrey Hairston’s application for Supplemental Security Income. The report addresses whether the administrative law judge erred at step two by finding that Hairston had no severe impairment, including obesity and recurrent hernia. It concludes that substantial evidence supported the finding that none of his impairments significantly limited his ability to perform basic work activities for the required duration.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Carmen E. Henderson; Pamela A. Barker
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	April 27, 2026
DOCKET	1:25-CV-02264-PAB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Report and recommendation on judicial review of the Commissioner of Social Security's final decision denying Supplemental Security Income benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and was made pursuant to proper legal standards. A supported decision must be affirmed even if the reviewing court would have reached a different conclusion.
PRECEDENTIAL VALUE	unknown
PARTIES	Jeffrey Hairston v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ reversibly erred at step two by finding that Hairston had no severe impairment or combination of impairments.
2. Whether the ALJ was required to find obesity severe merely because Hairston's BMI was classified as obese.
3. Whether the evidence established that Hairston's hernia condition lasted, or was expected to last, for a continuous period of at least twelve months and significantly limited his ability to perform basic work activities.

HOLDINGS

1. The ALJ did not err in finding that Hairston had no severe impairment or combination of impairments because Hairston failed to identify evidence showing that any impairment significantly limited his ability to perform basic work activities for the required duration.
2. An obese BMI alone does not require a finding that obesity is a severe impairment; the ALJ must make an individualized assessment of obesity's effect on functioning, and Hairston failed to identify evidence of functional limitations caused by obesity.
3. Hairston did not establish that his hernias existed for a continuous period of at least twelve months or caused work-related functional limitations.

KEY QUOTATIONS

"No specific weight or BMI establishes obesity as a 'severe' or 'not severe' impairment" (PageID 48)

"disability is determined by the functional limitations imposed by a condition, not the mere diagnosis of it." (PageID 48)

"When doctors' reports contain no information regarding physical limitations or the intensity, frequency, and duration of pain associated with a condition, [the Sixth Circuit] has regularly found substantial evidence to support a finding of no severe impairment." (PageID 49)

FACTUAL BACKGROUND

Hairston alleged anxiety, depression, cocaine use disorder, obesity, recurrent hernia after mesh repair, and several other medical conditions caused limitations in lifting, standing, walking, concentration, and handling stress. The medical evidence included multiple hernia-related surgeries, but also relatively normal examinations, intact motor function and sensation, normal strength and gait, no acute distress, and limited recovery periods after surgery. He reported performing activities including personal care, preparing meals, doing laundry, walking, using public transportation, shopping, paying bills, cooking, cleaning, and riding a bicycle.

PROCEDURAL HISTORY

Hairston applied for SSI on May 2, 2023. The application was denied initially and on reconsideration; after an October 24, 2024 hearing, an ALJ found that Hairston was not disabled because he had no severe impairment. The Appeals Council denied further review on August 22, 2025, making the ALJ's decision final. Hairston filed this action on October 21, 2025, challenging the step-two determination. The magistrate judge recommended overruling Hairston's statement of errors and affirming the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Winn v. Comm'r of Soc. Sec., 615 F. App'x 315, 320 (6th Cir.)
- Rogers v. Comm'r of Soc. Sec., 486 F.3d 234, 241 (6th Cir.)
- Cutlip v. Sec'y of HHS, 25 F.3d 284, 286 (6th Cir.)
- Olive v. Comm'r of Soc. Sec., No. 3:06 CV 1597, 2007 WL 5403416, at *2 (N.D. Ohio Sept. 19, 2007)
- Abbott v. Sullivan, 905 F.2d 918, 922 (6th Cir.)
- Mullen v. Bowen, 800 F.2d 535, 538 (6th Cir.) (en banc)
- Kinsella v. Schweiker, 708 F.2d 1058, 1059-60 (6th Cir.)
- Combs v. Comm'r of Soc. Sec., 459 F.3d 640, 642-43 (6th Cir.)
- Walters v. Comm'r of Soc. Sec., 127 F.3d 525, 529 (6th Cir.)
- Deaner v. Comm'r of Soc. Sec., 840 F. App'x 813, 816 (6th Cir.)
- Dyson v. Comm'r of Soc. Sec., 786 F. App'x 586, 589 (6th Cir.)
- Kidd v. Comm'r of Soc. Sec., 7 F. App'x 483, 490 (6th Cir.)
- Seeley v. Comm'r of Soc. Sec., 600 F. App'x 387, 390-91 (6th Cir.)
- Higgs v. Bowen, 880 F.2d 860, 863 (6th Cir.)
- Wright v. Massanari, 321 F.3d 611, 614 (6th Cir.)
- Berkshire v. Beauvais, 928 F.3d 520, 530-31 (6th Cir.)