

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Kelvin Fraser v. Frank Bisignano, Commissioner, Social Security Administration

Civil No. CJC-24-3018 (D. Md. Mar. 13, 2026) · No. CJC-24-3018 · Decided March 13, 2026

SUMMARY

The United States District Court for the District of Maryland reviews Kelvin Fraser’s challenge to the Social Security Administration’s denial of disability insurance benefits. The court holds that the Administrative Law Judge inadequately explained the evidentiary basis for the specific sit-stand-walk position changes included in Fraser’s residual functional capacity. Pursuant to sentence four of 42 U.S.C. § 405(g), the court reverses the Commissioner’s decision and remands for further proceedings.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Chelsea J. Crawford
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 13, 2026
DOCKET	CJC-24-3018
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review of the Commissioner of Social Security's final decision denying Fraser's application for disability insurance benefits. The court reviewed the administrative record and the parties' briefs without a hearing.
STANDARD OF REVIEW	The court affirms the ALJ's decision if its factual findings are supported by substantial evidence and were reached through application of the correct legal standard. Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. The court also reviews whether the ALJ examined all relevant evidence and provided a sufficient rationale for crediting and discrediting evidence.
PRECEDENTIAL VALUE	unpublished
PARTIES	Kelvin Fraser v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the evidentiary basis for the RFC requirement allowing Fraser to change positions for up to five minutes every hour.
2. Whether the ALJ's failure to provide a logical bridge between the evidence and the specific position-change intervals required reversal and remand.

HOLDINGS

1. The ALJ failed to adequately explain the basis for requiring Fraser to change positions for up to five minutes every hour. The decision's statement that the changes were needed to relieve pain or discomfort did not explain why those particular time intervals were supported by the medical evidence or other evidence in the record.

KEY QUOTATIONS

"A proper RFC analysis has three components: (1) evidence, (2) logical explanation, and (3) conclusion."
(Discussion)

"The ultimate issue here—and the error in the ALJ's decision—is not necessarily the RFC finding, but the lack of a clear, logical bridge between the evidence and the ALJ's conclusion." (Discussion)

"For the reasons set forth herein, pursuant to sentence four of 42 U.S.C. § 405(g), the SSA's judgment is REVERSED due to inadequate analysis. The case is REMANDED for further proceedings in accordance with this opinion." (Conclusion)

FACTUAL BACKGROUND

Fraser alleged disability beginning August 9, 2015, and was last insured on December 31, 2020. The ALJ found severe physical impairments including degenerative disc disease, scoliosis, shoulder conditions, leg shin splints, plantar fasciitis, and chronic pain syndrome, but determined that Fraser could perform a restricted range of sedentary work. The RFC required Fraser to have an opportunity to change from sitting to standing or walking, or vice versa, for up to five minutes throughout every hour while remaining on task. The ALJ did not explain why the evidence supported those specific intervals.

PROCEDURAL HISTORY

Fraser applied for disability insurance benefits under Title II of the Social Security Act. After the claim was denied initially and on reconsideration, an administrative law judge held a hearing and found Fraser not disabled; the Appeals Council denied review, making the ALJ's decision final. Fraser timely filed for judicial

review, and the district court reversed and remanded under sentence four of 42 U.S.C. § 405(g) because the ALJ inadequately explained the evidentiary basis for the RFC's specific sit-stand-walk intervals.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

On remand, the ALJ must explain how the medical evidence supports Fraser's need for position changes at the specific time intervals imposed, including any related on-task or off-task limitations. The ALJ may also reconsider Fraser's other arguments and make any necessary adjustments to the decision.

CASES CITED

- *Hancock v. Astrue*, 667 F.3d 470, 472 (4th Cir. 2012)
- *Thomas v. Berryhill*, 916 F.3d 307, 310–11 (4th Cir. 2019), as amended (Feb. 22, 2019)
- *Brown v. Comm’r Soc. Sec. Admin.*, 873 F.3d 251, 254 (4th Cir. 2017)
- *Shelley C. v. Comm’r of Soc. Sec. Admin.*, 61 F.4th 341, 353 (4th Cir. 2023)
- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Drumgold v. Comm’r of Soc. Sec.*, 144 F.4th 596, 605 (4th Cir. 2025)
- *Stephanie E. v. O’Malley*, Civil Action No. CDA-23-0343, 2024 WL 622105, at *4 (D. Md. Feb. 14, 2024)
- *Ronald J. v. Kijakazi*, Civil Action No. GLS-21-1845, 2022 WL 3134446, at *3–4 (D. Md. Aug. 5, 2022)
- *Candace W. v. Kijakazi*, Civil Action No. TJS-20-3344, 2022 WL 521967, at *2–3 (D. Md. Feb. 22, 2022)

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