

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PRECEDENTIAL VALUE	unpublished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

judicial review of agency action

administrative law

disability definition

remedies

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

civil procedure

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)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF MARYLAND CHAMBERS OF 101 WEST LOMBARD STREET CHELSEA J. CRAWFORD BALTIMORE, MARYLAND 21201 UNITED STATES MAGISTRATE JUDGE MDD _CJCChambersi@ mdd.uscourts.gow (410) 962-4560 March 13, 2026 LETTER TO ALL COUNSEL OF RECORD Re: — Kelvin Fraser v. Frank Bisignano, Commissioner, Social Security Administration Civil No. CJC-24-3018 Dear Counsel: Plaintiff/Claimant Kelvin Fraser petitions this Court for review of the Commissioner of the Social Security Administration’s (the “Commissioner”) final decision involving his claim for disability insurance benefits (“DIB”).

ECF No. 1. The Court has considered the record and the parties’ briefs. ECF Nos. 7, 10, 14. No hearing is necessary. Loc. R. 105.6 (D. Md. 2025). For the reasons that follow, the Court reverses and remands the Commissioner’s decision to the Social Security Administration.

I. PROCEDURAL BACKGROUND Fraser filed an application for DIB under Title II of the Social Security Act on January 3, 2023, alleging disabilities that began on August 9, 2015. R. 15, 163-66. Fraser’s claim for DIB was denied initially on June 13, 2023 and on reconsideration on

August 22, 2023. R. 87-92, 95- 102. An Administrative Law Judge (“ALJ”) held a hearing regarding Fraser’s DIB claim on April 22, 2024.

R. 39-86. Following the hearing, on July 25, 2024, the ALJ determined that Fraser was not disabled during the relevant time frame. R. 12-38. Thereafter, Fraser requested that the Social Security Appeals Council review the ALJ’s decision. R. 160- 162.

On September 17, 2024, the Appeals Council denied the request for review, rendering the ALJ’s decision the final, reviewable decision of the Social Security Administration (“SSA”). R. Fraser then timely petitioned for judicial review in this Court on October 17, 2024. ECF No. 1. II. THE ALJ’S DECISION A claimant is legally disabled under the Social Security Act if they are unable “to do any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death, or which has lasted or can be expected to last for a continuous period of not less than 12 months.” 20 C.F.R. § 404.1505(a).

The ALJ must conduct a five-step sequential evaluation to determine if a claimant is disabled. *Hancock v. Astrue*, 667 F.3d 470, 472 (4th Cir. 2012). “For the first four steps, the burden lies with the claimant; at step five, it shifts to the Commissioner.” *Thomas v. Berryhill*, 916 F.3d 307, 310 (4th Cir. 2019), as amended (Feb. 22, 2019).

The ALJ reviews whether the claimant “(1) worked during the alleged period of disability; (2) had a severe impairment; (3) had an impairment that met or equaled the requirements of a listed impairment; (4) could return to her past relevant work; and (5) if not, could perform any other work in the national economy.” *Hancock*, 667 F.3d at 472 (citing 20 C.F.R. § 404.1520(a)(4)).

Prior to steps four and five, the ALJ must determine a claimant’s Residual Functional Capacity (“RFC”), which is the most work a claimant can do despite their physical and mental limitations. *Brown v. Comm’r Soc. Sec. Admin.*, 873 F.3d 251, 254 (4th Cir. 2017).

The ALJ here conducted the sequential evaluation as follows. At step one, the ALJ determined that Fraser “did not engage in substantial gainful activity during the period from his alleged onset date of August 9, 2015, through his date last insured of December 31, 2020.” R. 17. At step two, the ALJ found that Fraser had the following severe impairments: “degenerative disc disease, scoliosis, supraspinatus tendinosis, history of right shoulder dislocation with residual right shoulder instability, leg shin splints, plantar fasciitis, [and] chronic pain syndrome.” R. 18.

At step three, the ALJ concluded that Fraser “did not have an impairment or combination of impairments that met or medically equaled the severity of one of the listed impairments in 20 CFR Part 404, Subpart P, Appendix 1.” R. 19.

The ALJ further determined that Fraser had the residual functional capacity (“RFC”) to perform sedentary work as defined in 20 CFR 404.1567(a) except the claimant can lift or carry less than 10

pounds frequently or 10 pounds occasionally, sit 6 hours in an 8-hour day, and stand and/or walk 2 hours in an 8[-]hour day.

The claimant can occasionally climb ramps and stairs, never climb ladders, ropes, and scaffolds, frequently balance, and occasionally stoop, kneel, crouch, and crawl. The claimant can frequently perform fingering, handling and reaching bilaterally, with the exception that the claimant can occasionally perform overhead reaching with the dominant (right) upper extremity.

The claimant can have occasional exposure to extreme cold, extreme heat, wetness, and humidity. The claimant can be exposed to noise no louder than a typical office setting level (moderate noise) and lights no brighter than a typical office setting level.

The claimant requires the opportunity to use a single point cane, for ambulation. The claimant requires a lumbar pillow behind his back at the workstation. The claimant requires the opportunity to move from a seated position to a[] standing/walking position, or vice versa, for up to five minutes throughout every hour, remaining on task.

The claimant can understand, remember, and carry out simple and complex tasks but not at a production pace as defined in the SCO. R. 21–22. At step four, the ALJ determined that Fraser was unable to perform any past relevant work. R. 32. And at step five, the ALJ found that, considering Fraser’s age, education, work experience, and RFC, there were jobs that existed in significant numbers in the national economy that he could have performed.

R. 32. As a result, the ALJ concluded that Fraser was not disabled. R. 34. III. STANDARD OF REVIEW The Court will affirm the ALJ’s decision if the ALJ’s factual findings are “supported by substantial evidence and were reached through application of the correct legal standard.” *Shelley C. v. Comm’r of Soc. Sec. Admin.*, 61 F.4th 341, 353 (4th Cir. 2023) (citation omitted); 42 U.S.C. § 405(g).

An ALJ’s decision satisfies the substantial evidence standard if it contains “such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.” *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019) (citation omitted).

In conducting this review, the Court determines “not just ‘whether the ALJ examined all relevant evidence’ but also whether the ALJ ‘offered a sufficient rationale in crediting certain evidence and discrediting other evidence.’” *Drumgold v. Comm’r of Soc. Sec.*, 144 F.4th 596, 605 (4th Cir. 2025) (citation omitted). IV. DISCUSSION Fraser raises two general arguments on appeal.

First, Fraser contends that the ALJ erroneously evaluated his RFC. EFC No. 10 at 3–17. Specifically, Fraser argues that in the ALJ’s assessment of the RFC, the ALJ failed to describe how the evidence supported her findings. *Id.* Fraser highlights several examples that he believes demonstrate a failure on the part of the ALJ to logically connect the evidence to her conclusions.

He contends that the ALJ: (1) failed to articulate the basis for her finding that Fraser required position changes for up to five minutes throughout every hour; (2) failed to adequately address Fraser's non-severe mental impairments; (3) failed to address Fraser's ability to perform work-related activities for eight hours a day, five days per week; (4) failed to properly evaluate pertinent medical evidence and Fraser's medication usage; and (5) improperly exercised her lay judgment in the field of pain management.

Id. Fraser's second principal argument is that the ALJ erroneously evaluated his subjective complaints by relying on Fraser's reported daily activities. ECF No. 10 at 17–22. Because I agree that the ALJ failed to adequately explain the basis for Fraser's required position changes in the RFC, remand on this ground is appropriate.

Accordingly, I need not address Fraser's other arguments. A claimant's RFC is defined as the most work that a claimant can perform despite the claimant's limitations. 20 C.F.R. § 404.1545(a)(1). To assess a claimant's RFC, an ALJ must "consider all of the claimant's 'physical and mental impairments, severe and otherwise, and determine, on a function-by-function basis, how they affect [his] ability to work.'" Thomas, 916 F.3d at 311 (citation omitted).

Among the functions an ALJ must assess are the abilities to sit, stand, and walk. 20 CFR § 404.1545(b). "[A] proper RFC analysis has three components: (1) evidence, (2) logical explanation, and (3) conclusion." Thomas, 916 F.3d at 311. Fraser argues that the ALJ failed to explain her reasoning for the conclusion that Fraser "requires the opportunity to move from a seated position to a standing/walking position, or vice versa, for up to five minutes throughout every hour, remaining on task." R. 22.

Fraser argues that the ALJ's analysis lacks the "logical bridge" connecting her conclusion to the evidence. I agree. The ALJ's explanation for Fraser's required position changes is inadequate because the ALJ does not explain the rationale for her conclusion that Fraser required the opportunity to change positions for up to five minutes each hour.

The ALJ only stated that Fraser required sit-stand-walking changes "[t]o relieve pain and/or discomfort." R. 30. Nowhere in the decision does the ALJ explain her reasoning for the specific time intervals of the position changes.¹ This omission is significant. This Court has previously remanded decisions that were similarly devoid of explanations regarding a claimant's required position changes and physical adjustments.

In *Stephanie E. v. O'Malley*, the ALJ concluded that the plaintiff was required to adjust her position every forty-five minutes to accommodate the plaintiff's pain and limitations. Civil Action No. CDA-23-0343, 2024 WL 622105, at *4 (D. Md. Feb. 14, 2024).

However, "the ALJ did not explain, either through reliance on medical opinions or other evidence, how adjusting positions every forty-five minutes 'rather than any other interval of time' was

warranted based on the evidence of record.” Id. at *4 (emphasis in original) (quoting *Ronald J. v. Kijakazi*, Civil Action No. GLS- 21-1845, 2022 WL 3134446, at *4 (D.

Md. Aug. 5, 2022)). Accord *Candace W. v. Kijakazi*, Civil Action No. TJS-20-3344, 2022 WL 521967, at *2–3 (D. Md. Feb. 22, 2022) (remanding ALJ’s decision for failure to explain how the ALJ reached the plaintiff’s sit-stand requirement at 25- minute intervals); *Ronald J.*, 2022 WL 3134446, at *3–4 (remanding ALJ’s decision for failure to explain the basis for the plaintiff’s forty-five minute adjustment limitation).

Remand is likewise appropriate here because “inadequacies in the ALJ’s analysis frustrate [my] review” to determine whether the ALJ’s decision is supported by substantial evidence. *Candace W.*, 2022 WL 521967, at *3.

On remand, the ALJ must explain how the medical evidence supports Fraser’s need for position changes at the specific time intervals imposed. The ALJ is welcome to consider Fraser’s other arguments and make any required adjustments to the ALJ’s opinion. Additionally, in remanding for further explanation, I express no opinion as to whether the ALJ’s conclusion that Fraser is not entitled to benefits is correct.

V. CONCLUSION 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.

The clerk is directed to CLOSE this case. 1 Fraser also argues that the ALJ did not explain how Fraser’s need to change positions could be accommodated within the time-off-task allowance. ECF No. 10 at 9. However, the ALJ specifically concluded that Fraser could remain on task while changing positions, and the vocational expert testified that sedentary positions would be available in the national economy for an individual who needed to change positions while remaining on task.

See Tr. 22, 81–82. 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. On remand, the ALJ should clearly explain how the evidence presented supports the requirement for position changes, including the specific time intervals for such changes and any related on-task or off-task limitations.

Despite the informal nature of this letter, it should be flagged as a Memorandum Opinion. A separate implementing Order follows. Sincerely, /s/ Chelsea J. Crawford United States Magistrate Judge