

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Chad H. v. Frank Bisignano, Commissioner, Social Security Administration

Chad H. · No. Civil No. 25-0380-DRM · Decided February 20, 2026

SUMMARY

The United States District Court for the District of Maryland remands the Commissioner of Social Security’s denial of Chad H.’s Supplemental Security Income claim. The court holds that the ALJ’s residual functional capacity limitation barring work with “specific production rates” was undefined and ambiguous, preventing meaningful judicial review and undermining the step-five vocational-expert finding. The remand is ordered under sentence four of 42 U.S.C. § 405(g).

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	February 20, 2026
DOCKET	Civil No. 25-0380-DRM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying supplemental security income 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 mere scintilla but may be less than a preponderance.
PRECEDENTIAL VALUE	Unknown; district-court memorandum opinion
PARTIES	Chad H. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- disability definition

PRACTICE AREAS

Social Security law

administrative law

judicial review of agency action

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ's residual-functional-capacity limitation restricting Plaintiff to work without "specific production rates" was sufficiently defined to permit meaningful judicial review.
2. Whether the ALJ's use of the undefined phrase "specific production rates" required remand because the phrase undermined the vocational-expert hypothetical and the step-five finding.
3. Whether Plaintiff forfeited the challenge by failing to seek clarification of the vocational-expert hypothetical at the administrative hearing.

HOLDINGS

1. An RFC limitation using the undefined and ambiguous phrase "specific production rates," without an explanation of the metric, standard, or expectation involved, is insufficiently clear to permit meaningful judicial review.
2. Restrictions concerning simple job instructions and limited interaction with supervisors, coworkers, and the public do not, standing alone, clarify an ambiguous production-rate restriction.
3. Plaintiff did not forfeit the challenge merely by failing to seek clarification of the vocational-expert hypothetical at the administrative hearing where the same ambiguous term appeared in both the RFC assessment and the hypothetical.

KEY QUOTATIONS

"Agency conclusions must be stated in terms the Court can understand for the Court to conduct a substantial evidence review." (at 4)

"Regardless of whether Plaintiff's counsel failed to appropriately question the VE, the ALJ is required to follow regulations and build a logical bridge between the evidence and their conclusions, which the ALJ failed to do by using undefined, ambiguous phrases such as "specific production rates." " (at 6)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning March 27, 2017, based on physical and mental impairments. After a prior remand, the second ALJ found severe lumbar and cervical spondylosis, major depressive disorder, generalized anxiety disorder, posttraumatic stress disorder, and attention deficit hyperactivity disorder. The ALJ limited Plaintiff to light work, simple instructions, limited social interaction, and work without "specific production rates," then relied on vocational-expert testimony to find that Plaintiff could perform other jobs in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income in 2017, was denied initially and on reconsideration, and received an unfavorable ALJ decision in 2020. The Appeals Council denied review, and this Court remanded the

matter in 2023. After a second hearing, a second ALJ again found Plaintiff not disabled in November 2024. Plaintiff sought review, and the court remanded the decision under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The SSA's decision was remanded under sentence four of 42 U.S.C. § 405(g) for further consideration and clarification of the RFC limitation concerning "specific production rates" and the resulting step-five determination.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- 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)
- DeLoatche v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Kiser v. Saul, 821 F. App'x 211, 212 (4th Cir. 2020)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Trena Sue Y. v. Kijakazi, No. DLB-20-1075, 2021 WL 4034264, at *2, *3-*4 (D. Md. Sept. 3, 2021)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Thomas v. Berryhill, 916 F.3d 307, 310-12 & n.5 (4th Cir. 2019)
- Linger v. Comm'r of Soc. Sec., No. 22-2192, 2025 WL 40548, at *5 (4th Cir. Jan. 7, 2025)
- Perry v. Berryhill, 765 F. App'x 869, 872 (4th Cir. 2019)
- Jessie F. v. Bisignano, No. 1:24CV995, 2025 WL 1950265, at *5-*6 (M.D.N.C. May 28, 2025)
- Fulks v. Bisignano, No. 1:24-CV-995, 2025 WL 1939902 (M.D.N.C. July 15, 2025)
- Hall v. Bisignano, No. 5:25-CV-00009-D, 2025 WL 3457913, at *7 (E.D.N.C. Sept. 25, 2025)
- Ursula G. v. Berryhill, No. SAG-18-1841, 2019 WL 2233978, at *2 (D. Md. May 23, 2019)
- Brenda C. v. Comm'r, Soc. Sec. Admin., No. SAG-18-3234, 2019 WL 4017024, at *2 (D. Md. Aug. 26, 2019)

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