

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

McCoy v. Commissioner of Social Security

McCoy · No. 1:25-cv-988 · Decided January 23, 2026

SUMMARY

This Report and Recommendation addresses Delaney A. McCoy’s challenge to the denial of child’s insurance benefits and supplemental security income. The magistrate judge recommends affirming the Commissioner of Social Security’s decision, concluding that the ALJ properly considered the educational records, medical opinions, and other evidence under the applicable Social Security standards. The recommendation applies substantial-evidence review and the five-step disability-evaluation framework.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	James E. Grimes Jr.
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 23, 2026
DOCKET	1:25-cv-988
DISPOSITION	other
PROCEDURAL POSTURE	Report and Recommendation on judicial review of the Commissioner's denial of applications for child's insurance benefits and supplemental security income.
STANDARD OF REVIEW	The court must affirm the Commissioner's decision unless the ALJ failed to apply the correct legal standards or made factual findings unsupported by substantial evidence. The court may not try the case de novo, resolve evidentiary conflicts, or decide credibility, and must affirm when substantial evidence supports the ALJ's conclusion even if substantial evidence also supports a contrary conclusion.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Delaney A. McCoy v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

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disability definition

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PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ evaluated McCoy's educational records consistently with Social Security Ruling 11-2p.
2. Whether the ALJ adequately explained the persuasiveness of the medical opinions under the supportability and consistency requirements of 20 C.F.R. § 416.920c.
3. Whether the ALJ's residual functional capacity assessment adequately accounted for McCoy's psychogenic non-epileptic seizures and alleged stress-related limitations.

HOLDINGS

1. The ALJ complied with Social Security Ruling 11-2p by considering McCoy's educational records, including the teacher's statement and Section 504 Plans; the ruling required consideration of relevant school records but did not require adoption of particular limitations suggested by those records.
2. The ALJ adequately explained the supportability and consistency factors in evaluating the challenged medical opinions and reasonably determined that the opinions were unpersuasive or only partially persuasive.
3. The ALJ's residual functional capacity determination was supported by substantial evidence and adequately accounted for McCoy's seizure-related limitations.

KEY QUOTATIONS

"A reviewing court must affirm the Commissioner's conclusions unless it determines "that the ALJ has failed to apply the correct legal standards or has made findings of fact unsupported by substantial evidence in the record."" (Tr. 29)

"It is plain, both from the ALJ's decision and McCoy's own briefing, that the ALJ "considered" McCoy's educational record." (Tr. 30)

"The ALJ's RFC determination is supported by substantial evidence because it aligns with the findings of the state agency reviewers, as the ALJ explained." (Tr. 31)

FACTUAL BACKGROUND

McCoy, born in 2003, had no past relevant work and alleged disability based on autism, ADHD, dissociative identity disorder, and seizure disorder. The medical record included ADHD and major depressive disorder, psychogenic non-epileptic seizures, counseling, educational accommodations, and generally unremarkable or improved examinations after treatment. The ALJ found severe impairments but determined that McCoy retained

the residual functional capacity for work at all exertional levels subject to restrictions involving climbing, hazards, commercial driving, and public interactions.

PROCEDURAL HISTORY

McCoy applied for child's insurance benefits and supplemental security income, alleging disability beginning November 20, 2023. The Commissioner denied the applications initially and on reconsideration. After a telephonic hearing, the ALJ issued a decision finding McCoy not disabled, and the Appeals Council denied review in March 2025. The district court referred the matter to a magistrate judge, who recommended affirming the Commissioner's decision.

DISPOSITION

other

CASES CITED

- McClanahan v. Comm'r of Soc. Sec., 193 F. App'x 422, 425 (6th Cir. 2006)
- Jordan v. Comm'r of Soc. Sec., 548 F.3d 417, 422-23 (6th Cir. 2008)
- Walters v. Comm'r of Soc. Sec., 127 F.3d 525, 529 (6th Cir. 1997)
- Biestek v. Berryhill, 587 U.S. 97, 99, 102-03 (2019)
- Bass v. McMahon, 499 F.3d 506, 509 (6th Cir. 2007)
- Jones v. Comm'r of Soc. Sec., 336 F.3d 469, 477 (6th Cir. 2003)
- Lindsley v. Comm'r of Soc. Sec., 560 F.3d 601, 605 (6th Cir. 2009)
- Felisky v. Bowen, 35 F.3d 1027, 1035 (6th Cir. 1994)
- Heckler v. Edwards, 465 U.S. 870, 873 n.1 (1984)
- Anthony L. v. Comm'r of Soc. Sec., No. 1:22-CV-605, 2023 WL 5349509, at *4 (S.D. Ohio Aug. 21, 2023)
- Rottmann v. Comm'r of Soc. Sec., 817 F. App'x 192, 196 (6th Cir. 2020)
- NLRB v. Newark Elec. Corp., 14 F.4th 152, 163 (2d Cir. 2021)
- United States v. Chemical Found., Inc., 272 U.S. 1, 14-15 (1926)
- Higgs v. Bowen, 880 F.2d 860, 864 (6th Cir. 1988)
- Kurman v. Kijakazi, No. 1:20-cv-1837, 2022 WL 1067568, at *7 (N.D. Ohio Jan. 13, 2022)
- Cormany v. Kijakazi, No. 5:21-cv-933, 2022 WL 4115232, at *3 (N.D. Ohio Sept. 9, 2022)
- Toennies v. Comm'r of Soc. Sec., 2020 WL 2841379, at *14 (N.D. Ohio June 1, 2020)
- Chaney v. Comm'r of Soc. Sec. Admin., No. 1:22-cv-1291, 2023 WL 5509429, at *11 n.2 (N.D. Ohio Aug. 25, 2023)
- Stanley v. Comm'r of Soc. Sec. Admin., No. 1:18-cv-1733, 2019 WL 4480183, at *9 (N.D. Ohio Sept. 18, 2019)
- Sallaz v. Comm'r of Soc. Sec., No. 23-3825, 2024 WL 2955645, at *6 (6th Cir. June 12, 2024)
- Kornecky v. Comm'r of Soc. Sec., 167 F. App'x 496, 508 (6th Cir. 2006)
- Loral Defense Systems-Akron v. N.L.R.B., 200 F.3d 436, 453 (6th Cir. 1999)

- Hatcher v. Berryhill, No. 1:18-cv-1123, 2019 WL 1382288, at *15 (N.D. Ohio Mar. 27, 2019)
- Cross v. Comm'r of Soc. Sec., 373 F. Supp. 2d 724, 733 (N.D. Ohio 2005)
- Berkshire v. Beauvais, 928 F.3d 520, 530-31 (6th Cir. 2019)

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