

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

James Johnson v. Commissioner of Social Security Administration

No. 3:25-CV-00658-AMK (N.D. Ohio Mar. 31, 2026) · No. 3:25-CV-00658-AMK · Decided March 31, 2026

SUMMARY

The United States District Court for the Northern District of Ohio reviews the Commissioner of Social Security’s denial of James Johnson’s applications for Disability Insurance Benefits and Supplemental Security Income. The court concludes that the Administrative Law Judge did not adequately explain the evaluation of medical opinion evidence, including opinions from treating physician Jeffrey Harwood, M.D. The court reverses the Commissioner’s decision and remands the case under sentence four of 42 U.S.C. § 405(g) for further proceedings.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                           |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Ohio, Eastern Division                                                                                                                                                                                          |
| WRITING FOR THE COURT | Amanda M. Knapp                                                                                                                                                                                                                                                           |
| JURISDICTION          | United States District Court for the Northern District of Ohio, Eastern Division                                                                                                                                                                                          |
| DECIDED               | March 31, 2026                                                                                                                                                                                                                                                            |
| DOCKET                | 3:25-CV-00658-AMK                                                                                                                                                                                                                                                         |
| DISPOSITION           | reversed_and_remanded                                                                                                                                                                                                                                                     |
| PROCEDURAL POSTURE    | Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying applications for Disability Insurance Benefits and Supplemental Security Income.                                                                                                    |
| STANDARD OF REVIEW    | The court reviews whether the Commissioner applied the correct legal standards and whether the ALJ's factual findings are supported by substantial evidence. The court may not decide credibility issues, resolve evidentiary conflicts, or reweigh the evidence de novo. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                               |
| PARTIES               | James Johnson v. Commissioner of Social Security Administration                                                                                                                                                                                                           |

TOPICS

judicial review of agency action

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## PRACTICE AREAS

Social Security disability benefits

administrative law

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disability adjudication

## QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the persuasiveness of Dr. Harwood's medical opinions under 20 C.F.R. § 404.1520c.
2. Whether the ALJ was required to consider Dr. Harwood's multiple medical opinions together in a single source-level analysis.
3. Whether the ALJ's explanation built an accurate and logical bridge between the medical evidence and the RFC-related findings.

## HOLDINGS

1. Although an ALJ need not separately analyze each medical opinion from a single source, the ALJ must articulate how the multiple opinions from that source were considered together in a single analysis.
2. An ALJ must adequately explain the supportability and consistency findings for the medical opinions in the record, including opinions from the same treating source issued at different times and based on different supporting information.
3. Because the ALJ inadequately evaluated Dr. Harwood's medical opinions and failed to build an accurate and logical bridge between the evidence and the result, the Commissioner's decision must be reversed and remanded for further proceedings.

## KEY QUOTATIONS

*“Although the regulations did not require the ALJ to individually articulate a persuasiveness analysis for each of Dr. Harwood’s medical opinions, they did require the ALJ to consider both opinions “together in a single analysis.”” (at 34)*

*“For the foregoing reasons, the Court REVERSES and REMANDS the case pursuant to 42 U.S.C. § 405(g) sentence four, for further proceedings consistent with this Order.” (Conclusion)*

## FACTUAL BACKGROUND

Johnson alleged disability based on spinal disorders, radiculopathy, respiratory conditions, gastrointestinal conditions, and mental-health impairments. His medical history included recurrent pneumonia and respiratory hospitalizations, lumbar disc herniation and radiculopathy, and ultimately an L5-S1 laminotomy and discectomy in November 2022. His treating physician, Jeffrey Harwood, submitted medical source statements in November 2022 and August 2023 opining that Johnson had substantial exertional, postural, manipulative, environmental, attendance, and off-task limitations. The ALJ evaluated only the earlier opinion and found it unpersuasive.

## PROCEDURAL HISTORY

Johnson applied for DIB and SSI, alleging disability beginning August 24, 2021. The applications were denied initially and on reconsideration; following a September 8, 2023 telephonic hearing, the ALJ denied benefits on February 5, 2024. The Appeals Council declined review on February 6, 2025, making the ALJ's decision final. Johnson then filed this action, arguing that the ALJ inadequately evaluated two medical opinions from treating physician Jeffrey Harwood, M.D. The district court reversed and remanded for further proceedings.

## DISPOSITION

reversed\_and\_remanded

## REMAND INSTRUCTIONS

The ALJ must consider the entire record, provide an accurate and well-reasoned explanation supporting the persuasiveness findings for all medical opinion evidence, including both opinions of treating physician Jeffrey Harwood, M.D., and ensure that the rationale builds an accurate and logical bridge between the evidence and the result.

## CASES CITED

- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 405-06 (6th Cir. 2009)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 535 (6th Cir. 2001)
- Besaw v. Secretary of Health & Human Services, 966 F.2d 1028, 1030 (6th Cir. 1992)
- Brainard v. Secretary of Health & Human Services, 889 F.2d 679, 681 (6th Cir. 1989)
- McClanahan v. Commissioner of Social Security, 474 F.3d 830, 833 (6th Cir. 2006)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Rabbers v. Commissioner of Social Security Administration, 582 F.3d 647, 651 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)
- Wilson v. Commissioner of Social Security, 378 F.3d 541, 546-47 (6th Cir. 2004)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 249 (6th Cir. 2007)
- Houston v. Secretary of Health & Human Services, 736 F.2d 365, 366 (6th Cir. 1984)
- Boseley v. Commissioner of Social Security Administration, 397 F. App'x 195, 199 (6th Cir. 2010)
- Kornecky v. Commissioner of Social Security, 167 F. App'x 496, 507-08 (6th Cir. 2006)
- Minor v. Commissioner of Social Security, 513 F. App'x 417, 435 (6th Cir. 2013)
- Germany-Johnson v. Commissioner of Social Security, 313 F. App'x 771, 777 (6th Cir. 2008)
- Young v. Commissioner of Social Security, 351 F. Supp. 2d 644, 649 (E.D. Mich. 2004)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877, 881 (N.D. Ohio 2011)

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