

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA, CHARLESTON DIVISION

Trina M. v. Frank Bisignano

Trina M. · No. 2:25-cv-00209 · Decided January 5, 2026

SUMMARY

This proposed findings and recommendations addresses a claimant’s action seeking judicial review of the Commissioner of Social Security’s denial of Disability Insurance Benefits. The magistrate judge recommends affirming the Commissioner’s decision and dismissing the action, concluding that the ALJ adequately explained why the claimant’s mild mental limitations did not require mental restrictions in the residual functional capacity assessment.

CASE DETAILS

COURT	United States District Court for the Southern District of West Virginia, Charleston Division
WRITING FOR THE COURT	Joseph K. Reeder; Irene C. Berger
JURISDICTION	United States District Court for the Southern District of West Virginia, Charleston Division
DECIDED	January 5, 2026
DOCKET	2:25-cv-00209
DISPOSITION	other
PROCEDURAL POSTURE	Proposed findings and recommendations by a United States magistrate judge on cross-motions for judgment on the pleadings in an action seeking judicial review of the Commissioner's denial of Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision resulted from an appropriate application of law and is supported by substantial evidence. It does not conduct de novo review and must affirm when substantial evidence supports the decision, even if the court would have reached a different conclusion.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Trina M. v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

judicial review of agency action

administrative law

motion for judgment on the pleadings

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ erred by finding mild mental-functioning limitations at step two but failing to include corresponding mental restrictions in the residual functional capacity assessment.
2. Whether substantial evidence supported the ALJ's finding that the claimant could perform her past relevant work as a dental assistant.
3. Whether any alleged deficiency in the ALJ's explanation warranted remand absent a showing of prejudice.

HOLDINGS

1. A finding of mild limitation in the broad paragraph B areas of mental functioning does not automatically require corresponding work-related restrictions in the RFC because paragraph B ratings do not directly correspond to specific work functions.
2. The ALJ adequately explained why the claimant's mild mental limitations did not result in mental RFC restrictions, and the decision permitted meaningful judicial review.
3. Remand was unwarranted because the claimant did not identify any supported mental functional limitation that would have changed the RFC or the step-four determination and therefore failed to demonstrate prejudice.

KEY QUOTATIONS

“The issue before the Court is whether the final decision of the Commissioner is based upon an appropriate application of the law and is supported by substantial evidence.” (Scope of Review)

“A finding of mild limitation under the psychiatric review technique does not automatically translate into work-related functional limitations that must be reflected in the RFC.” (Discussion)

FACTUAL BACKGROUND

The claimant alleged disability based on physical impairments, including conditions following a Whipple procedure, chronic biliary pancreatitis, diabetes, gastroparesis, neuropathy, and osteoarthritis. The ALJ also identified unspecified depressive disorder but found no more than mild limitations in the four broad areas of mental functioning. The record contained minimal mental-health treatment, generally normal mental-status findings, no medical opinion imposing mental work-related restrictions, and hearing testimony focused on physical rather than mental limitations.

PROCEDURAL HISTORY

Trina M. applied for Disability Insurance Benefits, alleging disability beginning April 5, 2021. The Social Security Administration denied the claim initially and on reconsideration; after a hearing, the ALJ found that she was not disabled because she could perform her past relevant work as a dental assistant. The Appeals Council denied review on January 28, 2025. Trina M. then filed this action under 42 U.S.C. § 405(g), and the matter was referred to Magistrate Judge Reeder for proposed findings and recommendations.

DISPOSITION

other

CASES CITED

- Blalock v. Richardson, 483 F.2d 773, 774 (4th Cir. 1973)
- McLain v. Schweiker, 715 F.2d 866, 868-69 (4th Cir. 1983)
- McLamore v. Weinberger, 538 F.2d 572, 574 (4th Cir. 1976)
- Hays v. Sullivan, 907 F.2d 1453, 1456 (4th Cir. 1990)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Johnson v. Barnhart, 434 F.3d 650, 653 (4th Cir. 2005)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Shinaberry v. Saul, 952 F.3d 113, 121-22 (4th Cir. 2020)
- Owens v. Kijakazi, No. 22-1273, 2023 WL 2344224, at *3 (4th Cir. Mar. 3, 2023)
- Deanna S. v. Dudek, No. 2:24-cv-00358, 2025 WL 1510659, at *7 (S.D.W. Va. May 7, 2025)
- Wells v. Colvin, 727 F.3d 1061 (10th Cir. 2013)
- Thomas v. Berryhill, 916 F.3d 307, 311-12 (4th Cir. 2019)
- Linda S. v. O'Malley, No. 2:24-cv-00050, 2024 WL 5515753, at *9 (S.D.W. Va. May 30, 2024)
- Angela C. v. Kijakazi, No. 2:22-cv-00333, 2023 WL 3471006, at *6-7 (S.D.W. Va. May 15, 2023)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Shinseki v. Sanders, 556 U.S. 396, 409 (2009)
- Mascio v. Colvin, 780 F.3d 632, 639 (4th Cir. 2015)
- Snyder v. Ridenour, 889 F.2d 1363 (4th Cir. 1989)
- Thomas v. Arn, 474 U.S. 140 (1985)
- Wright v. Collins, 766 F.2d 841 (4th Cir. 1985)
- United States v. Schronce, 727 F.2d 91 (4th Cir. 1984)

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