

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Crystal Hodge v. Commissioner of Social Security

Hodge · No. 5:25-cv-01297-CEH · Decided March 13, 2026

SUMMARY

The United States District Court for the Northern District of Ohio reviews Crystal Hodge’s challenge to the Commissioner of Social Security’s denial of Supplemental Security Income. The court holds that the newly submitted treatment records do not warrant a Sentence Six remand because they are cumulative and not material, and that the administrative law judge’s residual functional capacity assessment is supported by substantial evidence. The court affirms the Commissioner’s nondisability determination and overrules Hodge’s statement of errors.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	Carmen E. Henderson
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	March 13, 2026
DOCKET	5:25-cv-01297-CEH
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Supplemental Security Income and argued that a Sentence Six remand was warranted and that the ALJ's residual functional capacity finding lacked substantial-evidence support.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and was made pursuant to proper legal standards. Substantial evidence is more than a scintilla but less than a preponderance and is relevant evidence a reasonable mind might accept as adequate.
PRECEDENTIAL VALUE	unpublished
PARTIES	Crystal Hodge v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether a Sentence Six remand under 42 U.S.C. § 405(g) was warranted based on treatment records that were new, material, and supported by good cause.
2. Whether the ALJ's assessment of Hodge's subjective symptoms and residual functional capacity was supported by substantial evidence.

HOLDINGS

1. Sentence Six remand was not warranted because, although the newly submitted Coleman Professional Services records were new and good cause existed for their late submission, Hodge failed to show that the records were material or that there was a reasonable probability they would have changed the disability determination.
2. The ALJ's assessment of Hodge's symptom severity, consistency, and residual functional capacity was supported by substantial evidence.
3. Hodge did not establish that her medication and treatment noncompliance was expressly linked to her mental impairments, and the ALJ therefore reasonably relied on the treatment gaps and noncompliance in evaluating symptom consistency.

KEY QUOTATIONS

“evidence is “material” only if there is “a reasonable probability that the [ALJ] would have reached a different disposition of the disability claim if presented with the new evidence.”” (PageID 57)

“Although the Sixth Circuit has not established a per se rule that the existence of a mental impairment constitutes an acceptable reason for failure to follow prescribed treatment, noncompliance with medication could be justified by mental illness if there is some evidence linking the mental illness to the noncompliance.” (PageID 62)

“Nevertheless, the ALJ’s characterization of Hodge’s activities of daily living is based on substantial evidence.” (PageID 65)

“Thus, substantial evidence supports the decision, and this Court will not disturb the ALJ’s findings.” (PageID 66)

FACTUAL BACKGROUND

Hodge alleged disability based in part on bipolar disorder, post-traumatic stress disorder, depression, anxiety, and borderline intellectual functioning during the relevant period of October 13, 2017, through December 31, 2021. The administrative record showed intermittent mental-health treatment and medication noncompliance, but also generally mild or benign mental-status findings, including logical thought processes, generally normal

cognition, and cooperative behavior. Hodge reported substantial mental-health symptoms and limitations in hygiene, social interaction, concentration, and household activities, while the record also documented time with family, swimming, shopping-related activity, and riding with her husband during DoorDash work.

PROCEDURAL HISTORY

Hodge applied for SSI on May 8, 2023. The application was denied initially and on reconsideration; following a May 29, 2024 hearing, the ALJ issued a nondisability decision on June 7, 2024. The Appeals Council denied review on April 22, 2025, making the ALJ's decision final. Hodge filed this action on June 23, 2025, and the parties briefed the issues before the court by consent under 28 U.S.C. § 636(c).

DISPOSITION

affirmed

CASES CITED

- Winn v. Commissioner of Social Security, 615 F. App'x 315, 320 (6th Cir. 2015)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 241 (6th Cir. 2007)
- Cutlip v. Secretary of HHS, 25 F.3d 284, 286 (6th Cir. 1994)
- Olive v. Commissioner of Social Security, No. 3:06 CV 1597, 2007 WL 5403416, at *2 (N.D. Ohio Sept. 19, 2007)
- Abbott v. Sullivan, 905 F.2d 918, 922 (6th Cir. 1990)
- Mullen v. Bowen, 800 F.2d 535, 538 (6th Cir. 1986) (en banc)
- Kinsella v. Schweiker, 708 F.2d 1058, 1059-60 (6th Cir. 1983)
- Combs v. Commissioner of Social Security, 459 F.3d 640, 642-43 (6th Cir. 2006)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Sullivan v. Finkelstein, 496 U.S. 617, 626 (1990)
- Sizemore v. Secretary of Health & Human Services, 865 F.2d 709, 711-12 (6th Cir. 1988)
- Willis v. Secretary of Health & Human Services, 727 F.2d 551, 554 (6th Cir. 1984)
- Oliver v. Secretary of Health & Human Services, 804 F.2d 964, 966 (6th Cir. 1986)
- Foster v. Halter, 279 F.3d 348, 357 (6th Cir. 2001)
- Prater v. Commissioner of Social Security, 235 F. Supp. 3d 876, 2017 WL 588496, at *2 (N.D. Ohio 2017)
- Jones v. Commissioner of Social Security, 336 F.3d 469, 478 (6th Cir. 2003)
- Deloge v. Commissioner of Social Security, 540 F. App'x 517, 2013 WL 5613751, at *3 (6th Cir. 2013)
- Cross v. Commissioner of Social Security, 373 F. Supp. 2d 724, 733 (N.D. Ohio 2005)
- Felisky v. Bowen, 35 F.3d 1027, 1036 (6th Cir. 1994)
- Vaughn v. Berryhill, No. 3:16-cv-02821, 2018 U.S. Dist. LEXIS 15916, 2018 WL 632377, at *6 (M.D. Tenn. Jan. 11, 2018)
- White v. Commissioner of Social Security, 572 F.3d 272, 283 (6th Cir. 2009)
- Pate-Fires v. Astrue, 564 F.3d 935, 945 (8th Cir. 2009)

- Polhemus v. Colvin, 2016 WL 949218, at *4 (E.D. Mich. Mar. 14, 2016)
- Blankenship v. Bowen, 874 F.2d 1116, 1124 (6th Cir. 1989)
- Burge v. Commissioner of Social Security, No. 1:13 CV 87, 2013 U.S. Dist. LEXIS 180376 (N.D. Ohio Dec. 26, 2013)
- Rogers v. Commissioner of Social Security, Civil Action No. 17-14151, 2019 U.S. Dist. LEXIS 38563, at *9-10 (E.D. Mich. Jan. 17, 2019)
- Marjorie Uhl v. Commissioner of Social Security Administration, 2021 WL 2188303, at *10 (N.D. Ohio May 14, 2021)
- Dial v. Kijakazi, No. 1:23-cv-00071, 2024 U.S. Dist. LEXIS 82151, at *28-29 (M.D. Tenn. May 6, 2024)
- Youghioghenny & Ohio Coal Co. v. Webb, 49 F.3d 244, 246 (6th Cir. 1995)
- Wright v. Massanari, 321 F.3d 611, 614 (6th Cir. 2003)
- Key v. Callahan, 109 F.3d 270, 273 (6th Cir. 1997)
- Buxton v. Halter, 246 F.3d 762, 772 (6th Cir. 2001)