

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Heather Ann H. v. Commissioner of Social Security

No. 3:25-CV-00246 (PJE) · No. 3:25-CV-00246 (PJE) · Decided March 3, 2026

SUMMARY

The document is a Memorandum-Decision and Order from the U.S. District Court for the Northern District of New York reviewing the denial of Heather Ann H.'s applications for disability insurance and supplemental security income benefits. The court upheld the Commissioner's decision, granting the Commissioner's cross-motion for judgment on the pleadings and denying the plaintiff's motion. The court concluded that the administrative law judge's residual functional capacity assessment and evaluation of the medical opinions were supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Paul J. Evangelista
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 3, 2026
DOCKET	3:25-CV-00246 (PJE)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance and supplemental security income benefits. The parties cross-moved for judgment on the pleadings, and the parties consented to direct review by a magistrate judge.
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether the correct legal standards were applied and whether the decision is supported by substantial evidence. The court may not conduct a de novo disability determination or reweigh the evidence.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court decision
PARTIES	Heather Ann H. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ conducted the individualized assessment required by SSR 85-15 and adequately accounted for plaintiff's ability to handle work-related stress in the RFC.
2. Whether the ALJ's RFC adequately accounted for alleged limitations in concentration, persistence, pace, time off task, and absenteeism.
3. Whether the ALJ adequately explained the supportability and consistency factors when evaluating the opinions of Dr. Pareek and Dr. Shapiro.
4. Whether the Commissioner's decision was supported by substantial evidence and applied the correct legal standards.

HOLDINGS

1. The ALJ adequately conducted an individualized assessment of plaintiff's mental RFC and accounted for work-related stress through restrictions to simple tasks, limited social interaction, simple work-related decisions, and occasional work changes.
2. The ALJ did not err by declining to include additional or greater RFC restrictions for time off task or absenteeism because the RFC and the ALJ's findings reasonably reflected mild-to-moderate limitations supported by the record.
3. The ALJ adequately articulated the supportability and consistency of Dr. Pareek's and Dr. Shapiro's opinions as required by 20 C.F.R. § 416.920c, and substantial evidence supported the resulting RFC.

KEY QUOTATIONS

"The district court may reverse the Commissioner's final decision only if the ALJ failed to apply the correct legal standards or support the decision with substantial evidence." (at 3)

"The ALJ pointed to a variety of normal medical findings as well as significant ADLs, which she is permitted to consider." (at 18-19)

FACTUAL BACKGROUND

Heather Ann H. applied for supplemental security income alleging disability beginning December 31, 2002. The ALJ found severe impairments consisting of substance use disorder, bipolar disorder, post-traumatic stress disorder, and anxiety disorder, but determined that plaintiff retained the residual functional capacity for work at all exertional levels with restrictions to simple tasks, a consistent goal-oriented pace, limited interaction with supervisors and coworkers, no interaction with the public or crowds, simple work-related decisions, and only occasional work changes. The ALJ found that plaintiff could not perform past relevant work but could perform other jobs existing in significant numbers in the national economy. The district court concluded that the ALJ

properly evaluated plaintiff's stress-related limitations and medical opinions concerning concentration, persistence, pace, time off task, and absenteeism.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income benefits in June 2022. The SSA denied the application initially and on reconsideration; after a February 2024 administrative hearing, an ALJ issued an unfavorable decision, and the Appeals Council denied review. Plaintiff commenced this action on February 26, 2025. The district court granted the Commissioner's cross-motion for judgment on the pleadings and denied plaintiff's motion.

DISPOSITION

affirmed

CASES CITED

- *Wagner v. Secretary of Health & Human Services*, 906 F.2d 856, 860 (2d Cir. 1990)
- *Johnson v. Bowen*, 817 F.2d 983, 985 (2d Cir. 1987)
- *Halloran v. Barnhart*, 362 F.3d 28, 31 (2d Cir. 2004) (per curiam)
- *Richardson v. Perales*, 402 U.S. 389, 401 (1971)
- *Brault v. Social Security Administration, Commissioner*, 683 F.3d 443, 448 (2d Cir. 2012) (per curiam)
- *Clark v. Commissioner of Social Security*, 143 F.3d 115, 118 (2d Cir. 1998)
- *Martone v. Apfel*, 70 F. Supp. 2d 145, 148, 150 (N.D.N.Y. 1999)
- *Schillo v. Kijakazi*, 31 F.4th 64, 74 (2d Cir. 2022)
- *McIntyre v. Colvin*, 758 F.3d 146, 149 (2d Cir. 2014)
- *Berry v. Schweiker*, 675 F.2d 464, 467 (2d Cir. 1982)
- *Barnhart v. Thomas*, 540 U.S. 20, 24 (2003)
- *DeChirico v. Callahan*, 134 F.3d 1177, 1180 (2d Cir. 1998)
- *Rucker v. Kijakazi*, No. 21-621-CV, 2022 WL 4074410, at *4 (2d Cir. Sept. 6, 2022)
- *Brenden R. v. Commissioner of Social Security*, No. 5:20-CV-821, 2021 WL 5965164, at *6 (N.D.N.Y. Dec. 15, 2021)
- *Gomez v. Commissioner of Social Security*, No. 18-CV-96-FPG, 2020 WL 1322565, at *4 (W.D.N.Y. Mar. 20, 2020)
- *Jacqueline L. v. Commissioner of Social Security*, 515 F. Supp. 3d 2, 12-13 (W.D.N.Y. 2021)
- *Bushey v. Saul*, No. 19-CV-313F, 2020 WL 5947140, at *5 (W.D.N.Y. Oct. 7, 2020)
- *Tatelman v. Colvin*, 296 F. Supp. 3d 608, 613 (W.D.N.Y. 2017)
- *Renaída R. v. Commissioner of Social Security*, No. 3:20-CV-00915 (TWD), 2021 WL 4458821, at *10 (N.D.N.Y. Sept. 29, 2021)
- *Tashona R. D. v. Commissioner of Social Security*, No. 5:23-CV-00583 (AMN/CFH), 2024 WL 4442722, at *6 (N.D.N.Y. Aug. 12, 2024)

- Kimberly B. v. Commissioner of Social Security, No. 5:22-CV-250 (ATB), 2023 WL 3318488, at *11 (N.D.N.Y. May 9, 2023)
- Shyla D. v. Kijakazi, No. 3:20-CV-1295 (DJS), 2022 WL 798158, at *3 (N.D.N.Y. Mar. 16, 2022)
- Michelle B. v. Commissioner of Social Security, No. 5:20-CV-332, 2021 WL 3022036, at *6 (N.D.N.Y. July 16, 2021)

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