

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
OHIO, WESTERN DIVISION

Carla D. v. Commissioner of Social Security

Civil Action No. 1:25-cv-272 · No. 1:25-cv-272 · Decided March 20, 2026

SUMMARY

The United States District Court for the Southern District of Ohio reviewed the Commissioner of Social Security’s denial of Carla D.’s application for supplemental security income. The court held that the administrative law judge inadequately evaluated the functional effects of the claimant’s obesity under Social Security Ruling 19-2p and failed to provide substantial support for the residual functional capacity determination. The court reversed the non-disability determination and remanded the matter under Sentence Four of 42 U.S.C. § 405(g).

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| COURT                 | United States District Court for the Southern District of Ohio, Western Division                                                                                                                                                                                                                                                                                                                                                                                                                           |
| WRITING FOR THE COURT | Chelsey M. Vascura                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| JURISDICTION          | United States District Court for the Southern District of Ohio, Western Division                                                                                                                                                                                                                                                                                                                                                                                                                           |
| DECIDED               | March 20, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| DOCKET                | 1:25-cv-272                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| DISPOSITION           | reversed_and_remanded                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| PROCEDURAL POSTURE    | Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Plaintiff's application for supplemental security income.                                                                                                                                                                                                                                                                                                                                                            |
| STANDARD OF REVIEW    | The court must affirm the Commissioner's decision if it is supported by substantial evidence and made under proper legal standards. Substantial evidence means relevant evidence that a reasonable mind might accept as adequate, and the court must consider the record as a whole, including evidence detracting from the decision. The court will not uphold a decision where the agency failed to follow its regulations and the error prejudiced the claimant or deprived her of a substantial right. |
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|---------------------------|-----------------------------------------------------------------------------------------------|
| <b>PRECEDENTIAL VALUE</b> | Unknown; district court opinion with no reported citation or stated precedential designation. |
| <b>PARTIES</b>            | Carla D. v. Commissioner of Social Security                                                   |

## TOPICS

judicial review of agency action administrative law disability definition civil procedure

## PRACTICE AREAS

Social Security administrative law disability benefits

## QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the limiting effects of Plaintiff's obesity when determining her residual functional capacity.
2. Whether the Commissioner's denial of SSI was supported by substantial evidence and complied with applicable Social Security regulations and rulings.

## HOLDINGS

1. The ALJ's evaluation of Plaintiff's obesity was inadequate because the explanation did not logically connect the record evidence to the RFC limitations and was not supported by substantial evidence.
2. The Commissioner's non-disability determination must be reversed and the matter remanded to the Commissioner and the ALJ for further consideration.

## KEY QUOTATIONS

*"The RFC assessment must reflect "the effect obesity has upon [a] person's ability to perform routine movement and necessary physical activity within the work environment.""*

*"That explanation did not need to be exhaustive. Yet the ALJ's explanation, that Plaintiff was "not that obese" fails to build a logical bridge between the record evidence and the ALJ's RFC determinations."*

## FACTUAL BACKGROUND

Plaintiff applied for SSI, alleging disability beginning in January 2021. The ALJ found severe impairments including osteoarthritis, spinal disorders, obesity, and mood disorder, and determined that Plaintiff retained the capacity for a restricted range of light work. In evaluating obesity, the ALJ relied in part on Plaintiff's BMI and an approximately twelve-pound weight loss, although the record showed fluctuating weight and a continuing obesity diagnosis. Plaintiff also testified to a height materially different from the height used by medical providers to calculate her BMI.

## PROCEDURAL HISTORY

Plaintiff's SSI application was denied initially and on reconsideration. Following a telephonic hearing, the ALJ issued an unfavorable determination on March 19, 2024. The Appeals Council denied review on February 21, 2025, making the ALJ's decision final. The district court reversed the Commissioner's determination and remanded under sentence four of 42 U.S.C. § 405(g).

## DISPOSITION

reversed\_and\_remanded

## REMAND INSTRUCTIONS

Remand to the Commissioner and the ALJ under sentence four of 42 U.S.C. § 405(g) for further consideration consistent with the Opinion and Order, including an adequate evaluation of the functional effects of Plaintiff's obesity and consideration of the discrepancy concerning her height and BMI calculations.

## CASES CITED

- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Henley v. Astrue, 573 F.3d 263, 264 (6th Cir. 2009)
- Foster v. Halter, 279 F.3d 348, 354 (6th Cir. 2001)
- DeLong v. Commissioner of Social Security, 748 F.3d 723, 726 (6th Cir. 2014)
- Moats v. Commissioner of Social Security, 42 F.4th 558, 561 (6th Cir. 2022)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Golden Living Center-Frankfort v. Secretary of Health and Human Services, 656 F.3d 421, 425 (6th Cir. 2011)
- Universal Camera Corp. v. NLRB, 340 U.S. 474, 487 (1951)
- Emard v. Commissioner of Social Security, 953 F.3d 844, 849 (6th Cir. 2020)
- Crum v. Sullivan, 921 F.2d 642, 644 (6th Cir. 1990)
- Rabbers v. Commissioner of Social Security, 582 F.3d 647, 651 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)