

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
GEORGIA, WAYCROSS DIVISION

Barbara Ann Harrington v. Commissioner of Social Security

Harrington · No. 5:24-cv-00093 · Decided January 26, 2026

SUMMARY

This Report and Recommendation addresses Barbara Ann Harrington’s challenge to the Commissioner of Social Security’s denial of Period of Disability and Disability Insurance Benefits. The magistrate judge concluded that the Administrative Law Judge properly evaluated Harrington’s impairments and residual functional capacity, including her mild mental limitations, and recommended affirming the decision and closing the case.

CASE DETAILS

COURT	United States District Court for the Southern District of Georgia, Waycross Division
WRITING FOR THE COURT	Benjamin W. Cheesbro
JURISDICTION	United States District Court for the Southern District of Georgia, Waycross Division
DECIDED	January 26, 2026
DOCKET	5:24-cv-00093
DISPOSITION	other
PROCEDURAL POSTURE	Report and recommendation by a United States magistrate judge on judicial review of the Commissioner's denial of Period of Disability and Disability Insurance Benefits.
STANDARD OF REVIEW	Whether the Commissioner's factual findings are supported by substantial evidence and whether the Commissioner applied the proper legal standards. The court may not decide facts anew, reweigh the evidence, or substitute its judgment for the Commissioner's.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Barbara Ann Harrington v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ was required to incorporate specific mental limitations corresponding to mild psychiatric-review-technique findings into the RFC.
2. Whether the ALJ adequately explained the relationship between the step-two psychiatric-review-technique findings and the RFC determination.
3. Whether substantial evidence and proper legal standards supported the ALJ's denial of benefits.

HOLDINGS

1. An ALJ is not required to reanalyze verbatim each of the four broad psychiatric-review-technique areas or automatically translate mild step-two findings into specific RFC restrictions, so long as the ALJ separately provides a detailed and itemized assessment of the claimant's functionality and considers all medically determinable impairments in the RFC analysis.
2. The ALJ's RFC assessment and denial of benefits were supported by substantial evidence and proper legal standards because the ALJ considered the claimant's mental impairments, evaluated the medical opinions and treatment records, and found that she could perform her past relevant work.

KEY QUOTATIONS

“The psychiatric review technique is plainly “not an RFC assessment” but is “used to rate the severity of mental impairment(s) at steps 2 and 3 of the sequential evaluation process.”” (Discussion, Section IV)

“The ALJ was not required to re-analyze, verbatim, each of the four broad areas of the psychiatric review technique.” (Discussion, Section IV)

FACTUAL BACKGROUND

Harrington alleged disability based on physical and mental impairments beginning March 17, 2023. The ALJ found severe physical impairments including osteoarthritis, a T-12 compression fracture, lumbar degenerative disc disease, obesity, and diabetes mellitus, as well as nonsevere depressive and anxiety disorders producing no more than mild limitations in the four broad mental-functioning areas. The ALJ assessed an RFC for a restricted range of light work and determined that Harrington could perform her past relevant work as an advertising clerk. The reviewing court relied on mental-health evaluations and treatment records showing mild symptoms, no disabling mental limitations, and generally adequate functioning.

PROCEDURAL HISTORY

Harrington applied for Period of Disability and Disability Insurance Benefits, alleging disability beginning March 17, 2023. After a June 25, 2024 administrative hearing, the ALJ denied the claim on August 14, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Harrington sought judicial review and argued that the ALJ failed to account for mild mental limitations in the residual functional

capacity assessment. The magistrate judge recommended affirming the ALJ's decision and closing the case; the recommendation remained subject to objections and review by a district judge.

DISPOSITION

other

CASES CITED

- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Phillips v. Barnhart, 357 F.3d 1232, 1238-39 (11th Cir. 2004)
- Stone v. Commissioner of Social Security, 503 F. App'x 692, 693-94 (11th Cir. 2013)
- Cornelius v. Sullivan, 936 F.2d 1143, 1145-46 (11th Cir. 1991)
- Ted Martin v. Louis W. Sullivan, Secretary of the Department of Health and Human Services, Martin v. Sullivan, 894 F.2d 1520, 1529 (11th Cir. 1990)
- Dyer v. Barnhart, 395 F.3d 1206, 1210 (11th Cir. 2005)
- Ingram v. Commissioner of Social Security Administration, 496 F.3d 1253, 1260 (11th Cir. 2007)
- Brown v. Sullivan, 921 F.2d 1233, 1236 (11th Cir. 1991)
- Wiggins v. Schweiker, 679 F.2d 1387, 1389 (11th Cir. 1982)
- Lane v. Astrue, No. 8:11-CV-345-T-27, 2012 WL 292637, at *4 (M.D. Fla. Jan. 12, 2012)
- Moore v. Barnhart, 405 F.3d 1208, 1213 (11th Cir. 2005)
- Jacobs v. Commissioner of Social Security, 520 F. App'x 947, 950 (11th Cir. 2013)
- Winschel v. Commissioner of Social Security, 631 F.3d 1176, 1180 (11th Cir. 2011)
- Wells v. Colvin, 727 F.3d 1061, 1068-71 (10th Cir. 2013)
- Harrigan v. Metro Dade Police Department Station #4, 977 F.3d 1185, 1192-93 (11th Cir. 2020)