

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Benjamin Lucas v. Frank Bisignano, Commissioner of Social Security

Lucas · No. 4:25-cv-00968-PAG · Decided January 26, 2026

SUMMARY

This Report and Recommendation addresses Benjamin Michael Lucas’s action seeking judicial review of the Commissioner of Social Security’s denial of Supplemental Security Income benefits. The magistrate judge recommends vacating and remanding the Commissioner’s decision because the ALJ failed to properly evaluate the supportability of psychologist Karin Worrell’s opinions and the state agency psychological consultants’ opinions under the applicable regulations.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Reuben J. Shepherd, United States Magistrate Judge; Patricia A. Gaughan, District Judge
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 26, 2026
DOCKET	4:25-cv-00968-PAG
DISPOSITION	remanded
PROCEDURAL POSTURE	Report and recommendation on judicial review of the Commissioner's denial of Lucas's application for Supplemental Security Income under Title XVI of the Social Security Act.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and whether proper legal standards were applied. The court may not decide facts anew, evaluate credibility, or reweigh the evidence, but may not uphold a decision based on legal error that prejudices the claimant or frustrates meaningful judicial review.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Benjamin Lucas v. Frank Bisignano, Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of Dr. Worrell's medical opinions under 20 C.F.R. § 416.920c.
2. Whether the ALJ properly evaluated the opinions of the state-agency psychological consultants, including the consultants' reliance on limitations from a prior ALJ decision under Drummond and Earley.

HOLDINGS

1. The ALJ adequately addressed the consistency of Dr. Worrell's opinions with the record but failed to properly assess their supportability because he inaccurately characterized Dr. Worrell's detailed explanations as merely a listing of diagnoses and subjective allegations.
2. The ALJ properly evaluated the state-agency psychological consultants' opinions and did not err by considering some mental limitations from the prior ALJ decision.

KEY QUOTATIONS

“It is, rather, a detailed evaluation tied directly to her own treatment of Lucas, and consistent with the generally subjective nature of mental health care.” (Tr. 122-23)

“Determining that Dr. Worrell’s opinions were unpersuasive on this flawed assessment of their supportability failed to build an accurate and logical bridge, and, accordingly, does not stand muster.” (Tr. 123)

FACTUAL BACKGROUND

Lucas alleged disability based primarily on autism spectrum disorder, PTSD, ADHD, depression, and anxiety. His treating psychologist, Karin Worrell, Ph.D., opined that he had severe limitations in concentration, task completion, social interaction, and handling workplace stress, including being off task at least 20 percent of the workday and absent more than four times monthly. The ALJ found Lucas capable of a restricted range of light work and discounted Dr. Worrell's opinion as inconsistent with the record and insufficiently supported.

PROCEDURAL HISTORY

Lucas filed an SSI application on October 11, 2022, alleging disability beginning October 22, 2020. The application was denied initially and on reconsideration; after a January 16, 2024 hearing, the ALJ found Lucas not disabled on March 14, 2024. The Appeals Council denied review on March 19, 2025, and Lucas filed this action on May 13, 2025. The magistrate judge recommended vacating the Commissioner's final decision and

remanding for further consideration of the treating psychologist's opinion, while rejecting Lucas's challenge to the evaluation of the state-agency psychological consultants.

DISPOSITION

remanded

REMAND INSTRUCTIONS

Vacate the Commissioner's final decision and remand for further consideration of Dr. Worrell's opinions, including an accurate assessment of their supportability under 20 C.F.R. § 416.920c. The recommendation would affirm the decision as to the challenge involving the state-agency psychological consultants and Drummond/Earley.

CASES CITED

- Kuhn v. Washtenaw Cnty., 709 F.3d 612, 624 (6th Cir. 2013)
- Combs v. Comm'r of Soc. Sec., 459 F.3d 640, 642-43 (6th Cir. 2006)
- Rogers v. Comm'r of Soc. Sec., 486 F.3d 234, 241 (6th Cir. 2007)
- Napier v. Comm'r of Soc. Sec., 127 F.4th 1000, 1004 (6th Cir. 2025)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Jones v. Comm'r of Soc. Sec., 336 F.3d 469, 476-77 (6th Cir. 2003)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Bowen v. Comm'r of Soc. Sec., 478 F.3d 742, 746 (6th Cir. 2007)
- Rabbers v. Comm'r Soc. Sec. Admin., 582 F.3d 647, 654 (6th Cir. 2009)
- Nejat v. Comm'r of Soc. Sec., 359 F. App'x 574, 578 (6th Cir. 2009)
- Harris v. Comm'r of Soc. Sec., No. 1:13-cv-00260, 2014 WL 346287, at *11 (N.D. Ohio Jan. 30, 2014)
- Gamble v. Berryhill, No. 5:16-CV-2869, 2018 WL 1080916, at *5 (N.D. Ohio Feb. 28, 2018)
- Lester v. Saul, No. 5:20-cv-01364, 2020 WL 8093313, at *14 (N.D. Ohio Dec. 11, 2020), report and recommendation adopted sub nom. Lester v. Comm'r of Soc. Sec., 2021 WL 119287 (N.D. Ohio Jan. 13, 2021)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- Sarchet v. Chater, 78 F.3d 305, 307 (7th Cir. 1996)
- Drummond v. Comm'r of Soc. Sec., 126 F.3d 837, 842 (6th Cir. 1997)
- Earley v. Comm'r of Soc. Sec., 893 F.3d 929, 933-34 (6th Cir. 2018)
- Najdl v. Comm'r of Soc. Sec., No. 21-cv-01578, 2022 WL 2820413, at *9 (N.D. Ohio July 8, 2022), report and recommendation adopted, 2022 WL 2818444 (N.D. Ohio July 18, 2022)
- Ferrell v. Berryhill, No. 16-cv-0050, 2019 WL 2077501, at *5 (E.D. Tenn. May 10, 2019)
- Gale v. Comm'r of Soc. Sec., No. 18-cv-00859, 2019 WL 8016516, at *5 (W.D. Mich. Apr. 17, 2019), report and recommendation adopted, 2020 WL 871201 (W.D. Mich. Feb. 21, 2020)
- Crawley v. Comm'r of Soc. Sec., No. 1:24-cv-1760, 2025 WL 1442562, at *10 (N.D. Ohio May 20, 2025)

- *Berkshire v. Dahl*, 928 F.3d 520, 530 (6th Cir. 2019)
- *Howard v. Sec'y of Health and Hum. Servs.*, 932 F.2d 505, 509 (6th Cir. 1991)
- *Overholt v. Green*, No. 1:17-CV-00186, 2018 WL 3018175, at *2 (W.D. Ky. June 15, 2018)
- *United States v. Wandashega*, 924 F.3d 868, 878-79 (6th Cir. 2019)

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