

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Hannah M. Bowen v. Commissioner of Social Security

Bowen · No. 3:25-cv-01142 · Decided May 8, 2026

SUMMARY

The United States District Court for the Northern District of Ohio overruled Hannah M. Bowen’s objections to a magistrate judge’s Report and Recommendation and adopted the recommendation. The court affirmed the Commissioner of Social Security’s decision denying benefits, concluding that the administrative law judge adequately accounted for the asserted superficial-interaction limitation and supported the residual functional capacity determination with substantial evidence.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	James R. Knepp II
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	May 8, 2026
DOCKET	3:25-cv-01142
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of a final Social Security disability benefits decision following objections to a magistrate judge's Report and Recommendation.
STANDARD OF REVIEW	The court reviews objections to a magistrate judge's Report and Recommendation de novo under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(2)-(3). In reviewing the Commissioner's decision, the court must affirm unless the Commissioner failed to apply the correct legal standards or made findings unsupported by substantial evidence; factual findings supported by substantial evidence are conclusive.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; precedential status not identified in the source
PARTIES	Hannah M. Bowen v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the administrative law judge's residual functional capacity adequately accounted for the opined limitation to superficial interaction with supervisors and the public.
2. Whether the Commissioner's decision was supported by substantial evidence and applied the correct legal standards.

HOLDINGS

1. The residual functional capacity, considered in the context of the administrative law judge's decision as a whole and together with the additional mental restrictions, adequately accounted for the opined limitation to superficial interaction.
2. The Commissioner's decision was supported by substantial evidence and was affirmed.

KEY QUOTATIONS

“must affirm the Commissioner’s conclusions absent a determination that the Commissioner has failed to apply the correct legal standards or has made findings of fact unsupported by substantial evidence in the record.” (at 2)

“Substantial evidence is defined as ‘such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.’” (at 2)

FACTUAL BACKGROUND

Bowen applied for disability insurance benefits in March 2022, alleging disability beginning May 6, 2017. The administrative law judge found her not disabled and assessed a residual functional capacity that included no tandem tasks and additional restrictions to simple, routine work, simple work-related decisions, and routine workplace changes. Bowen challenged the decision on the ground that the residual functional capacity did not adequately account for an opinion limiting her to superficial interactions with others.

PROCEDURAL HISTORY

Bowen applied for disability insurance benefits, and an administrative law judge found her not disabled. The magistrate judge recommended affirming the Commissioner's decision, Bowen objected, and the district court conducted de novo review of the challenged portions, overruled the objections, adopted the Report and Recommendation, and affirmed.

DISPOSITION

affirmed

CASES CITED

- Walters v. Comm'r of Soc. Sec., 127 F.3d 525, 528 (6th Cir. 1997)
- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Heston v. Comm'r of Soc. Sec., 245 F.3d 528, 534 (6th Cir. 2001)
- McClanahan v. Comm'r of Soc. Sec., 474 F.3d 830, 833 (6th Cir. 2006)
- Buckhanon ex rel. J.H. v. Astrue, 368 F. App'x 674, 678-79 (7th Cir. 2010)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION HANNAH M. BOWEN, CASE NO. 3:25 CV 1142 Plaintiff, v. JUDGE
JAMES R. KNEPP II COMMISSIONER OF SOCIAL SECURITY, Defendant.
MEMORANDUM OPINION AND ORDER INTRODUCTION Plaintiff Hannah M. Bowen seeks
judicial review of an adverse Social Security benefits decision under 42 U.S.C. § 405(g).

This case was referred to Magistrate Judge Jennifer Dowdell Armstrong for a Report and Recommendation (“R&R”) under Local Civil Rule 72.2(b)(1). Judge Armstrong recommends this Court affirm the Commissioner of Social Security’s final decision. (Doc. 12). Plaintiff filed objections to the R&R (Doc. 13) and the Commissioner filed a response thereto (Doc. 14).

For the reasons set forth below, the Court overrules Plaintiff’s objections, adopts the R&R, and affirms the Commissioner’s decision. PROCEDURAL BACKGROUND Plaintiff filed for disability insurance benefits in March 2022, alleging a disability onset date of May 6, 2017. See Tr. 422. Following the administrative process, an administrative law judge (“ALJ”) issued a written decision on January 2, 2025, finding Plaintiff not disabled.

(Tr. 24- 46). This appeal ultimately followed. (Doc. 1). Plaintiff raised a single argument alleging the ALJ failed to properly account for an opined “superficial interaction” limitation. See Doc. 7, at 7-13. In her R&R, Judge Armstrong concluded the ALJ adequately accounted for the opined limitation, adequately explained her reasoning for reaching the residual functional capacity (“RFC”) determination she did, and that the RFC is supported by substantial evidence.

See Doc. 12, at 28-40. She recommends the Court affirm the Commissioner’s decision. See *id.*
STANDARD OF REVIEW Under the relevant statute: Within fourteen days after being served with a copy [of a Magistrate Judge’s R&R], any party may serve and file written objections to such proposed findings and recommendations as provided by rules of court. A judge of the court shall make a de novo determination of those portions of the report or specified proposed findings or recommendations to which objection is made.

28 U.S.C. § 636(b)(1); see also Fed. R. Civ. P. 72(b)(2)-(3). In Social Security cases, the Court “must affirm the Commissioner’s conclusions absent a determination that the Commissioner has failed to apply the correct legal standards or has made findings of fact unsupported by substantial evidence in the record.” *Walters v. Comm’r of Soc. Sec.*, 127 F.3d 525, 528 (6th Cir.

1997); see also 42 U.S.C. § 405(g). “Substantial evidence is defined as ‘such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.’” *Colvin v. Barnhart*, 475 F.3d 727, 730 (6th Cir. 2007) (quoting *Heston v. Comm’r of Soc. Sec.*, 245 F.3d 528, 534 (6th Cir. 2001)). If the Commissioner’s findings of fact are supported by substantial evidence, those findings are conclusive.

McClanahan v. Comm’r of Soc. Sec., 474 F.3d 830, 833 (6th Cir. 2006). DISCUSSION¹ Plaintiff raises objections to the R&R. She argues the Magistrate Judge’s analysis incorrectly determined that a limitation to “no tandem tasks” sufficiently accounted for an opinion that she was limited to superficial interaction with others including with supervisors and the public.

(Doc. 13). The Commissioner responds that (1) the Magistrate Judge provided caselaw in support of her analysis and Plaintiff does not provide anything to the contrary, and (2) Plaintiff’s logical argument is contradicted by the dictionary definition of “tandem.” (Doc. 14).

The Court has carefully reviewed the R&R and finds it to present a thorough, well- reasoned, and correct evaluation of Plaintiff’s arguments regarding the opined “superficial” limitation. The Court agrees that the ALJ’s RFC determination, read in the context of the opinion as a whole and with common sense as is required, see *Buckhanon ex rel. J.H. v. Astrue*, 368 F. App’x 674, 678-79 (7th Cir.

2010), properly accounts for the opined superficial interaction limitation and is supported by substantial evidence. This is particularly so, as the Magistrate Judge recognized, where the ALJ imposed other significant mental restrictions in addition to the “no tandem tasks” limitation. These limitations in the RFC include that Plaintiff is restricted to jobs that: can be learned in less than a month; involve no more than simple, routine tasks; require only simple work-related decisions, and involve no more than routine workplace changes.

See Doc. 12 at 36 (citing Tr. 38). The Court finds Plaintiff’s objection not well-taken. 1. Neither Party objects to Judge Armstrong’s summary of the relevant medical record. Because the Court incorporates the R&R into this Opinion, it need not repeat Plaintiff’s medical history, which Judge Armstrong thoroughly described. CONCLUSION For the foregoing reasons, Plaintiff’s objections are OVERRULED, Judge Armstrong’s R&R (Doc.

12) is ADOPTED as the Order of this Court, and the Commissioner’s decision is AFFIRMED. IT IS SO ORDERED. s/ James R. Knepp II UNITED STATES DISTRICT JUDGE Dated: May 8, 2026

