

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PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; precedential status not identified in the source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)

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