

Social Security

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Program Operations Manual System (POMS)

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DI 25020.010 Mental Limitations

A. Policy

1. Nonexertional vs. Exertional

Mental limitations are generally considered to be nonexertional, but depression and conversion disorders may also limit exertion.

2. Medical Listing Not Met or Equaled

- a. It cannot be assumed that a failure to meet or equal one of the medical listings for mental impairments equates with the capacity to do at least unskilled work.
- b. If a medical listing is not met or equaled, the process must continue to consider whether the individual can meet the mental demands of PRW and, if not, whether he or she has the ability to adjust to other work considering his or her remaining mental and other functional capacities and vocational factors.

3. Mental Demands of Unskilled Work

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- a. The **basic mental demands of** competitive, remunerative, **unskilled work** include the abilities (on a sustained basis) to:
- understand, carry out, and remember simple instructions;
 - make judgments that are commensurate with the functions of unskilled work, i.e., simple work-related decisions.
 - respond appropriately to supervision, coworkers and work situations; and
 - deal with changes in a routine worksetting.
- b. A **substantial loss of ability to meet** any of the **basic mental demands** listed in A.3.a. above.
- severely limits the potential occupational base and thus,
 - would justify a finding of inability to perform other work even for persons with favorable age, education and work experience.

NOTE: "Substantial loss" cannot be precisely defined. It does not necessarily relate to any particular adjective, number, or percentage. In practical terms, an individual has a substantial loss of ability to perform a basic mental activity when he or she cannot perform the particular activity in regular, competitive employment but, at best, could do so only in a sheltered work setting where special considerations and attention are provided. This requires professional judgment, on the basis of the evidence in file in each case. The impairment in a claim of this type may meet or equal the listed medical criteria. Therefore, before making a determination that includes vocational evaluation, the adjudicator should discuss the case with a psychiatrist or psychologist to learn whether a significant part of the evidence had been previously overlooked or underrated.

- c. A person who can meet all of the mental demands listed in "DI 25020.010A.3.a." and has only a mental limitation(s) will almost always be capable of adjusting to other work since his or her potential occupational base would be the unskilled jobs at all exertional levels.

EXCEPTION: In a few **rare** instances where a person's vocational profile is **extremely** adverse (e.g., closely approaching retirement age, limited education or less, and essentially a lifetime commitment to a field of **unskilled** work that is now precluded by a mental impairment), a finding of "disabled" may be appropriate. (This would be adjudicated under the Lifetime Commitments Special Medical-Vocational Profile. See DI 25010.001B.3.).

B. Procedure

1. Introduction

In DI 25020.010B.2. through DI 25020.010B.5. it shows how the specific abilities listed in section I ("Summary Conclusions") on the mental RFC assessment form (SSA-4734-F4-SUP) relate to:

- the basic mental demands of work listed in DI 25020.010A.3.a. and
- the ability to perform work at various exertional levels and for specific jobs.

NOTE: The purpose of section I ("Summary Conclusion") on the SSA-4734-F-SUP is chiefly to have a worksheet to ensure that the psychiatrist or psychologist has considered each of these pertinent mental activities and the claimant's or beneficiary's degree of limitation for sustaining these activities over a normal workday and workweek on an ongoing, appropriate, and independent basis. **It is the narrative** written by the psychiatrist or psychologist **in section III** ("Functional Capacity Assessment") of form SSA-4734-F4-Sup **that adjudicators are to use as the assessment of RFC.** Adjudicators must take the RFC assessment **in section III** and decide what significance the elements discussed in this RFC assessment have in terms of the person's ability to meet the mental demands of past work or other work. This must be done carefully using the adjudicator's informed professional judgment.

2. Mental Abilities Needed For Any Job

a. Understanding, carrying out, and remembering simple instructions

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- The ability to remember locations and worklike procedures.
- The ability to understand and remember very short and simple instructions.
- The ability to carry out very short and simple instructions.
- The ability to maintain concentration and attention for extended periods (the approximately 2-hour segments between arrival and first break, lunch, second break, and departure).
- The ability to perform activities within a schedule, maintain regular attendance, and be punctual within customary tolerances.
- The ability to sustain an ordinary routine without special supervision.
- The ability to work in coordination with or proximity to others without being (unduly) distracted by them.
- The ability to complete a normal workday and workweek without interruptions from psychologically based symptoms and to perform at a consistent pace without an unreasonable number and length of rest periods.

b. Use of judgment

- The ability to make simple work-related decisions.
- The ability to be aware of normal hazards and take appropriate precautions.

c. Responding appropriately to supervision, coworkers, and usual work situations

- The ability to ask simple questions or request assistance.
- The ability to accept instructions and respond appropriately to criticism from supervisors.
- The ability to get along with coworkers or peers without (unduly) distracting them or exhibiting behavioral extremes.

d. Dealing with changes in a routine worksetting — the ability to respond appropriately to changes in (a routine) work setting.

3. Mental Abilities Critical For Performing Unskilled Work

The claimant/beneficiary must show the ability to:

- a. remember work-like procedures (locations are not critical).
- b. understand and remember very short and simple instructions.
- c. carry out very short and simple instructions.
- d. maintain attention for extended periods of 2-hour segments (concentration is not critical).
- e. maintain regular attendance and be punctual within customary tolerances. (These tolerances are usually strict.) Maintaining a schedule is not critical.
- f. sustain an ordinary routine without special supervision.
- g. work in coordination with or proximity to others without being (unduly) distracted by them.
- h. make simple work-related decisions.
- i. complete a normal workday and workweek without interruptions from psychologically based symptoms and perform at a consistent pace without an unreasonable number and length of rest periods. (These requirements are usually strict.)
- j. ask simple questions or request assistance.
- k. accept instructions and respond appropriately to criticism from supervisors.
- l. get along with coworkers or peers without (unduly) distracting them or exhibiting behavioral extremes.
- m. respond appropriately to changes in a (routine) work setting.
- n. be aware of normal hazards and take appropriate precautions.

4. Mental Abilities Needed To Do Semiskilled and Skilled Work

- a. The basic abilities listed in "DI 25020.010B.2." (i.e., the "abilities needed to perform any job") are necessary.
- b. Often, there is an **increasing requirement for understanding and memory** and for **concentration and persistence** , e.g.: the ability to:
 - understand and remember detailed instructions,
 - carry out detailed instructions, and
 - set realistic goals or make plans independently of others.
- c. Other special abilities may be needed depending upon the type of work and specific functions it involves.

5. Degrees of Mental Limitations vs. Specific Jobs

Different jobs require different degrees of mental ability.

EXAMPLE 1: Most competitive jobs require the **ability to meet basic standards of neatness and cleanliness**. However, the standards that must be met vary greatly depending upon whether the job(s) being considered involve dealing with the public; or working in a factory, a coal mine, a stock yard, etc.

EXAMPLE 2: Most competitive jobs require the ability to travel to and from work and thus, would be precluded by **extreme agoraphobia** in which the person is incapable of leaving his or her home. However, a mild case of agoraphobia may not preclude the ability to travel to and from work or preclude work performed in the same (and thus, familiar) setting each day.

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