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## Program Operations Manual System (POMS)

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TN 53 (03-97)

DI 24510.065 Section III of SSA-4734-F4-SUP - Functional Capacity Assessment

### A. Introduction

**Section III** is for recording the formal narrative mental RFC assessment and **provides** for the medical or psychological consultant (MC/PC) to prepare a **narrative statement** for **each** of the subsections (A through D) in section I.

### B. Operating Procedure

In preparing the formal narrative statement, the MC/PC is to address each of the four mental categories (Understanding and Memory, Concentration and Persistence, Social Interaction, and Adaptation) by:

- Identifying each mental category in turn; and
- Providing a narrative discussion of the individual's capacities and limitations.

#### 1. Writing the Narrative Statement

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- a. **Identify** the subsection (e.g., Understanding and Memory), then **discuss** the **functions** that the individual has demonstrated that he/she **can do**, as well as any **limitations** of those functions.
- **Describe**, in detail, the mental capacities, limitations, and any other information that is important in the comprehensive expression of mental RFC.
  - **Indicate** the extent to which the individual could be **expected to perform and sustain** the activity.
  - **Include** any additional information or consideration that is necessary to give a **clear description** of the individual's mental functional capacity.

Examples:

- The claimant can understand, remember, and carry out a two-step command involving simple instructions.
  - The claimant can understand complex instructions but can only recall at a span of two-step commands. The claimant, therefore, would be limited to this span.
  - The claimant can understand and remember a four-step command, but the disruption of executive functions is such that he can carry out only a single step before confusing the order.
- b. **Record conclusions of functional capacity** provided by examining physicians that are **appropriate** and **consistent** with the documented medical and nonmedical evidence, along with the supporting findings.
- Confined** discussion to the **effects** of the impairment(s) on function.
- c. **Include no severity ratings** or **nonspecific** qualifying **terms** (e.g., moderate, moderately severe) to describe limitations. Such terms do not describe function and do not usefully convey the extent of capacity limitation.

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- d. **Offer no opinion** as to whether the individual is **disabled** or whether the individual **can** or might perform or **qualify** for **levels** of work (e.g., unskilled) or **specific jobs** (e.g., truck driver).

## 2. Signature and Date

- a. **After completing** the narrative statement in section III, sign and date the SSA-4734-F4-SUP in the spaces provided.
- b. The MC/PC's name is to be typed or stamped below the signature.

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*To Link to this section - Use this URL:*

<http://policy.ssa.gov/poms.nsf/lnx/0424510065>

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