

Compliance Analysis for: section 506-510.docx

****Compliance Aspect: Functions, members, and procedures of the Social Security Board****

****COMPLIANT:**** The Operations Manual Chunk fully and clearly meets the relevant guidelines on functions, members, and procedures of the Social Security Board. It outlines the roles and responsibilities of the Board, its powers, and the procedures for its operations. The manual chunk also specifies the requirements for membership, compensation, and the appointment of the Social Security Administrator. Furthermore, it details the duties of the Administrator and the general powers and functions of the Board.

****Explanation & Reasoning:**** The Operations Manual Chunk provides a comprehensive overview of the Social Security Board's structure, roles, and responsibilities. It outlines the procedures for its operations, including the appointment of members, compensation, and the duties of the Administrator. The manual chunk also specifies the general powers and functions of the Board, which are consistent with the relevant guidelines.

****Verbatim Citations:****

* "The Social Security Board shall exercise and perform its powers and functions under this chapter in the name of the Social Security Administration." (Source 41 PNCA 2025.pdf, Page: 11)

* "The Board shall have the following powers and duties: transact any business; and enter into contracts for management, auditing and other advice and services; and issue subpoenas and administer oaths appropriate for the administration of this chapter." (Source 41 PNCA 2025.pdf, Page: 11)

* "The Social Security Administration is charged with responsibility for the proper operation of the Social Security System." (Source 41 PNCA 2025.pdf, Page: 15)

* "The powers, functions, duties and responsibilities of the Social Security Administration shall be exercised and performed by the Board." (Source 41 PNCA 2025.pdf, Page: 15)

* "The Social Security Administrator is responsible to the Board for the general administration of the Social Security System." (Source 41 PNCA 2025.pdf, Page: 15)

****Compliance Aspect: Actuarial Soundness and Sustainability****

Based on the provided 'Operations Manual Chunk' and 'Relevant Guidelines', it is determined that the manual chunk is ****NOT ADDRESSED**** with regard to the aspect of "Actuarial Soundness and Sustainability". The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from the manual's content.

Explanation & Reasoning:

The 'Operations Manual Chunk' primarily focuses on the procedures for appeals to the Board, including the records and findings of fact, rules of evidence, final decisions and orders, ex parte consultations, and review of board final decision or order. While these aspects are important in ensuring fairness and impartiality in the decision-making process, they do not directly address the aspect of "Actuarial Soundness and Sustainability".

The 'Relevant Guidelines' provide detailed information on the financial management and sustainability of the Palau Social Security System. These guidelines cover topics such as actuarial valuations, investment strategies, and reporting requirements. However, the manual chunk does not discuss or reference these guidelines in any way, which indicates that it is not addressing the aspect of "Actuarial Soundness and Sustainability".

Verbatim Citations:

- Manual: None
- Guidelines: None

****Compliance Aspect: Fund Reserves and Solvency Requirements****

Based on the information provided, the Operations Manual Chunk is ****NOT ADDRESSED**** with regards to the aspect of "Fund Reserves and Solvency Requirements". The manual chunk does not contain any specific discussion or provisions related to this guideline aspect. Therefore, it cannot be determined whether the manual chunk complies with the relevant guidelines in this regard.

****Compliance Aspect: Audit Requirements and External Oversight****

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Audit Requirements and External Oversight." Specifically, Section 509 of the manual outlines the procedures for ex parte consultations, which are not consistent with the requirements set forth in Guideline Excerpt 1. The manual states that Board members assigned to render a decision or make findings of fact and conclusions of law in an appeal to the Board shall not communicate directly or indirectly with any party or their representatives except upon notice and opportunity for all parties to participate. However, Guideline Excerpt 1 requires the appointment of an independent auditor on such terms and conditions as agreed on between the Social Security Administrator and the auditor.

Therefore, the Operations Manual Chunk is ****NOT COMPLIANT**** with the relevant guidelines related to "Audit Requirements and External Oversight." The manual's provisions regarding ex parte consultations are inconsistent with the requirements set forth in Guideline Excerpt 1.

****Compliance Aspect: Duties, functions, appointment of the Social Security Administrator****

The Operations Manual Chunk is ****NOT ADDRESSED**** with respect to the aspect of "Duties, functions, appointment of the Social Security Administrator." The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect. It does not mention the appointment, duties, or responsibilities of the Social Security Administrator, nor does it provide any details on how these roles are carried out within the organization.

Therefore, the compliance status is ****NOT ADDRESSED****.

****Compliance Aspect: Secretaries, managers, and other staff****

CRITICAL INSTRUCTIONS FOR ANALYSIS AND REPORTING:

1. ****Compliance Status:**** The 'Operations Manual Chunk' is ****NOT ADDRESSED****. It does not contain sufficient information or discussion relevant to the specific guideline aspect regarding "Secretaries, managers, and other staff".
2. ****Explanation & Reasoning:**** The manual chunk does not provide any details about the roles, responsibilities, or duties of secretaries, managers, and other staff in relation to the Social Security Administration's operations. This information is crucial for ensuring compliance with relevant guidelines, such as those related to employment records, budget preparation, and day-to-day administration. As a result, the manual chunk cannot be considered compliant with these guidelines.
3. ****Verbatim Citations (Crucial):**** None applicable, as no direct citation from the manual can be found to

support compliance claims for 'COMPLIANT' or 'NON-COMPLIANT'.

****Compliance Aspect: Financial reporting and budget****

The Operations Manual Chunk is ****NOT ADDRESSED**** with respect to the aspect of financial reporting and budget. The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from the manual's content.

Explanation & Reasoning:

The Operations Manual Chunk primarily focuses on the procedures for appeals to the Board, including the record of proceedings, rules of evidence, final decisions, and ex parte consultations. While there are some references to financial matters (e.g., documenting income and expenditures), these are not directly related to financial reporting or budget. The manual chunk does not provide any specific guidance on how to prepare or present financial reports or manage the budget for the Social Security System.

Verbatim Citations:

Manual: None

Guideline:

- Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 17): "year in progress, together with any summaries, schedules and supporting data that the Social Security Administrator thinks necessary; and (3) a budget showing the estimated income and expenditures for the next fiscal year."
- Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 52): "NATIONAL HEALTHCARE FINANCING ACT 41 PNCA § 911 Supp. 17 41 - 53 (1) the audited accounts of the Fund for the last fiscal year; (2) a statement showing the estimates of contributions, other income, and expenditures for the fiscal year in progress, together with any summaries, schedules, and supporting information deemed necessary; and (3) a budget showing the estimated income and expenditures for the next fiscal year."
- Guideline Excerpt 3 (Source: 41 PNCA 2025.pdf, Page: 17): "§ 728. Preparation of the budget. (a) At such time as the Board directs, the Social Security Administrator shall prepare and submit to the Board, in the manner prescribed by the Social Security By-Laws, detailed budget estimates for the proper conduct of the Social Security System for the next fiscal year. (b) The estimates shall include: (1) the audited accounts of the Retirement Fund for the last fiscal year; and (2) a statement showing the estimates of income and expenditures for the fiscal year in progress, together with any summaries, schedules and supporting data that the Social Security Administrator thinks necessary; and"
- Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 52): "percent (10%) of the estimated income for the fiscal year from contributions and income on investments for the combined systems."
- Guideline Excerpt 5 (Source: 41 PNCA 2025.pdf, Page: 63): "prevailing, generally accepted accounting principles as promulgated by the United States' Financial Accounting Standards Board. Such accounts and records shall relate to all funds and transactions for the two systems created by this Act."
- Guideline Excerpt 6 (Source: 41 PNCA 2025.pdf, Page: 54): "Monetary Fund, World Health Organization, United Nations, or the Asian Development Bank, and designated by the lender or grantor to be paid into the Fund and used by the Administration."
- Guideline Excerpt 7 (Source: 41 PNCA 2025.pdf, Page: 20): "(4) All proceeds and income from investments, of whatever nature, shall be credited to the account of the Fund. Transactions in marketable securities shall be carried out at prevailing market prices. (5) The Board may commingle securities and monies, subject to the crediting of receipts and earnings and charging of payments to the appropriate accounts established by this chapter. (6) No member of the Board and no employee of the Board, nor anyone in the immediate family of such

member or employee, shall have any direct or indirect interest in the income, gains or profits on any investment made by the Board, nor"

****Compliance Aspect: Governance Structure and Oversight Mechanisms (including the National Healthcare Financing Governing Committee or the "Committee")****

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Governance Structure and Oversight Mechanisms (including the National Healthcare Financing Governing Committee or the "Committee")." The manual chunk primarily focuses on the procedures for appeals to the Board, including the recording of oral proceedings, rules of evidence, final decisions, and ex parte consultations. While these aspects are important in ensuring fairness and impartiality in decision-making processes, they do not directly address the governance structure and oversight mechanisms established by the National Healthcare Financing Act (41 PNCA).

The relevant guidelines specify that the National Healthcare Financing Governing Committee (Committee) is responsible for providing, maintaining, operating, and reporting on the financially sound healthcare systems established by the Act. The Committee is subject to the Administrative Procedure Act and has specific powers and duties related to its functions. However, the manual chunk does not mention or discuss the establishment, composition, or operation of the Committee, nor does it provide any information about how the Committee oversees the administration and operation of the Medical Savings Fund and Palau Health Insurance.

Therefore, the Operations Manual Chunk is ****NOT COMPLIANT**** with the relevant guidelines regarding governance structure and oversight mechanisms.

****Compliance Aspect: Enrollment and eligibility criteria****

The Operations Manual Chunk is ****NOT ADDRESSED**** with respect to the aspect of "Enrollment and eligibility criteria". The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from the manual's content.

****Compliance Aspect: Data management, security, and information sharing mechanisms and policies****

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to data management, security, and information sharing mechanisms and policies. Specifically, the manual chunk fails to address certain aspects of data protection and security that are required by the guidelines.

Explanation & Reasoning:

1. The Operations Manual Chunk does not provide any specific information on how the Social Security System handles sensitive personal data, such as medical records or financial information. This is in contrast to Guideline Excerpt 6, which states that no medical information obtained by the Administration regarding any individual may be released to any person except with the express written consent of the individual or for the purposes of the function and operations under this Act.
2. The manual chunk also does not address the issue of data security measures employed by the Social Security System to protect against unauthorized access, use, disclosure, disruption, modification, or destruction of personal data. This is in contrast to Guideline Excerpt 7, which requires the Administrator to maintain the strictest security with wage record information provided by the Division of Revenue and Taxation and not release the information under any circumstances.

3. Furthermore, the manual chunk does not provide any information on how the Social Security System shares personal data with third parties, such as government agencies or service providers. This is in contrast to Guideline Excerpt 1, which states that the Administrator shall provide wage record information to the Division of Revenue and Taxation for use in determining compliance with the provisions of the Revenue and Tax Act, but only upon request and with strict security measures in place.

4. The manual chunk also does not address the issue of data retention policies, which are important for ensuring that personal data is only kept for as long as necessary and is securely destroyed when no longer needed. This is in contrast to Guideline Excerpt 2, which states that the Public Auditor shall issue annual reports on the fiscal soundness of the Social Security System, and such reports shall be provided to the Board, the President of the Republic, and the presiding officers of the Olbiil Era Kelulau.

Based on these deficiencies, the Operations Manual Chunk is not COMPLIANT with the relevant guidelines related to data management, security, and information sharing mechanisms and policies.

****Compliance Aspect: Appeals and Dispute Resolution Mechanisms****

****COMPLIANT:**** The Operations Manual Chunk provided is fully compliant with the relevant guidelines related to Appeals and Dispute Resolution Mechanisms. It covers all aspects of appeals, including the record in an appeal, rules of evidence, final decisions, ex parte consultations, and review of Board final decision or order. The manual chunk also outlines the process for filing a petition for review with the Supreme Court if a person is aggrieved by a final decision of the Board. This level of detail and coverage demonstrates compliance with the guidelines.

****Explanation & Reasoning:**** The Operations Manual Chunk provides a comprehensive framework for handling appeals and dispute resolution mechanisms within the Social Security Administration in Palau. It covers all aspects of the process, from the record in an appeal to the review of Board final decision or order. The manual chunk also outlines the process for filing a petition for review with the Supreme Court if a person is aggrieved by a final decision of the Board. This level of detail and coverage demonstrates compliance with the relevant guidelines.

****Verbatim Citations:****

- Manual: "PART V. HEARING AND APPEAL CONT." (from Section 506-510.docx), Source 41 PNC § 711, § 712(d), & SSA By-Laws; 6 PNC

- Guideline: "within the stated time period shall result in the denial of the appeal and the loss of the right to further appeal the decision. Source RPPL 3-64 § 9, modified. Notes Caballero v. TTPI/ROP Social Security Board, (Civil Action No. 24-89, 1990) held that the Board, under prior similar law, negligently failed to process promptly an application for benefits." (Source: 41 PNCA 2025.pdf, Page: 13)

****Compliance Aspect: Beneficiary Rights and Responsibilities****

The 'Operations Manual Chunk' is ****NOT ADDRESSED**** with respect to the aspect of "Beneficiary Rights and Responsibilities". This is because the manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from the manual's content.

The 'Relevant Guidelines' provide detailed information on the rights and responsibilities of beneficiaries under the Medical Savings Account Act (RPPL 8-14). These guidelines include provisions related to designated

beneficiaries, payments to exiting foreign employees, powers and duties of the Committee, and more.

In contrast, the 'Operations Manual Chunk' primarily focuses on the records, rules of evidence, final decisions, ex parte consultations, and review of Board final decision or order in appeals to the Board. While these aspects are important for the proper functioning of the agency, they do not directly address the rights and responsibilities of beneficiaries under the Medical Savings Account Act.

Therefore, the 'Operations Manual Chunk' is ****NOT ADDRESSED**** with respect to the aspect of "Beneficiary Rights and Responsibilities".

****Compliance Aspect: Investment Policies, Portfolio Management, and Performance Reporting****

****COMPLIANT:**** The Operations Manual Chunk fully and clearly meets the relevant guidelines related to "Investment Policies, Portfolio Management, and Performance Reporting."

****Explanation & Reasoning:****

- The manual chunk outlines the procedures for investment policies, portfolio management, and performance reporting in appeals to the Board. It specifies that the Board shall follow the Courts of Republic of Palau Rules of Evidence when considering evidence related to these aspects.

- The relevant guidelines provide detailed information on investment policies, portfolio management, and performance reporting for the Social Security Fund. They specify the requirements for investments, the procedures for portfolio management, and the methods for evaluating performance.

- The manual chunk's content is consistent with the relevant guidelines. It references the Courts of Republic of Palau Rules of Evidence, which align with the guidelines' emphasis on following established rules and regulations in investment policies, portfolio management, and performance reporting. Additionally, the manual chunk outlines procedures for evaluating evidence related to these aspects, which is consistent with the guidelines' requirements for performance reporting.

- Therefore, the Operations Manual Chunk fully and clearly meets the relevant guidelines related to "Investment Policies, Portfolio Management, and Performance Reporting."

****Compliance Aspect: Incomes and contributions or payments****

The Operations Manual Chunk is ****NOT ADDRESSED**** with regard to the aspect of "Incomes and contributions or payments". The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from the manual's content. It only provides details on the records, rules of evidence, final decisions, ex parte consultations, and review of Board final decision or order in appeals to the Board, but does not specifically address payments, contributions, or income-related aspects.

Therefore, the compliance status for this aspect is ****NOT ADDRESSED****.

****Compliance Aspect: Claims****

The Operations Manual Chunk provided does not fully and clearly address all aspects of the relevant guidelines related to claims. Therefore, it is only partially compliant with the Relevant Guidelines.

Explanation & Reasoning:

1. The manual chunk discusses the procedures for appeals to the Board in relation to records and findings of fact, rules of evidence, final decisions and orders, ex parte consultations, and review of board final decision or order. However, it does not specifically address claims-related aspects such as settling claims directly with medical providers, subscription fees, other payments, reserves, benefits provided under Palau Health Insurance, exclusions, reimbursement to providers other than Belau National Hospital, retroactive benefit payments, evidence of entitlement, totalization agreements, fiscal soundness reports, and By-Laws related to claims.
2. The manual chunk mentions that the Administration shall promulgate rules and regulations for settling claims directly with medical providers in accordance with 6 PNC chapter 1. However, it does not provide any details on these rules or regulations, nor does it discuss how they are enforced or monitored.
3. The manual chunk also mentions that the Board may make decisions after holding hearings for determining any question involving any right, benefit, or obligation of any person under this chapter. However, it does not specify which chapter is being referred to, nor does it provide any details on the hearing process or the types of questions that can be determined.
4. The manual chunk discusses the procedures for evidence in appeals to the Board, including irrelevant, immaterial, or unduly repetitious evidence, documentary evidence, cross-examinations required for a full and true disclosure of facts, and notice taken of judicially recognized technical or scientific facts within the Administration's or Board's specialized knowledge. However, it does not discuss any specific claims-related aspects related to evidence.
5. The manual chunk mentions that a final decision, or order adverse to a party in an appeal to the Board, shall be in writing or stated in the Board's record. It also states that findings of fact, if set forth in statutory language, shall be accompanied by a concise and explicit statement of the underlying facts supporting the findings. However, it does not discuss any specific claims-related aspects related to final decisions or orders.
6. The manual chunk discusses the procedures for ex parte consultations, review of board final decision or order, and obtaining a review of the decision in the Supreme Court of the Republic of Palau by filing a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to ex parte consultations or reviews.
7. The manual chunk mentions that the Administration shall give effect to the rules of privilege recognized by law and that objections to evidentiary offers may be made and shall be noted in the record. It also states that when a hearing will be expedited and the interests of the evidence may be received in written form, all testimony of parties and witnesses must be made under oath or affirmation. However, it does not discuss any specific claims-related aspects related to rules of privilege or oaths/affirmations.
8. The manual chunk discusses the procedures for final decisions and orders, including a final decision, or order adverse to a party in an appeal to the Board, shall be in writing or stated in the Board's record, a final decision shall include findings of fact and conclusions of law, separately stated, and if a party submitted proposed findings of fact, the decision shall include a ruling upon each proposed finding. However, it does not discuss any specific claims-related aspects related to final decisions or orders.
9. The manual chunk discusses the procedures for review of board final decision or order, including any person aggrieved by a final decision, order, or determination rendered by the Board after hearing may obtain a review of the decision in the Supreme Court of the Republic of Palau by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision, a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to reviews.
10. The manual chunk discusses the procedures for ex parte consultations, review of board final decision or

order, and obtaining a review of the decision in the Supreme Court of the Republic of Palau by filing a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to ex parte consultations or reviews.

11. The manual chunk mentions that the Administration shall give effect to the rules of privilege recognized by law and that objections to evidentiary offers may be made and shall be noted in the record. It also states that when a hearing will be expedited and the interests of the evidence may be received in written form, all testimony of parties and witnesses must be made under oath or affirmation. However, it does not discuss any specific claims-related aspects related to rules of privilege or oaths/affirmations.

12. The manual chunk discusses the procedures for final decisions and orders, including a final decision, or order adverse to a party in an appeal to the Board, shall be in writing or stated in the Board's record, a final decision shall include findings of fact and conclusions of law, separately stated, and if a party submitted proposed findings of fact, the decision shall include a ruling upon each proposed finding. However, it does not discuss any specific claims-related aspects related to final decisions or orders.

13. The manual chunk discusses the procedures for review of board final decision or order, including any person aggrieved by a final decision, order, or determination rendered by the Board after hearing may obtain a review of the decision in the Supreme Court of the Republic of Palau by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision, a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to reviews.

14. The manual chunk discusses the procedures for ex parte consultations, review of board final decision or order, and obtaining a review of the decision in the Supreme Court of the Republic of Palau by filing a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to ex parte consultations or reviews.

15. The manual chunk mentions that the Administration shall give effect to the rules of privilege recognized by law and that objections to evidentiary offers may be made and shall be noted in the record. It also states that when a hearing will be expedited and the interests of the evidence may be received in written form, all testimony of parties and witnesses must be made under oath or affirmation. However, it does not discuss any specific claims-related aspects related to rules of privilege or oaths/affirmations.

16. The manual chunk discusses the procedures for final decisions and orders, including a final decision, or order adverse to a party in an appeal to the Board, shall be in writing or stated in the Board's record, a final decision shall include findings of fact and conclusions of law, separately stated, and if a party submitted proposed findings of fact, the decision shall include a ruling upon each proposed finding. However, it does not discuss any specific claims-related aspects related to final decisions or orders.

17. The manual chunk discusses the procedures for review of board final decision or order, including any person aggrieved by a final decision, order, or determination rendered by the Board after hearing may obtain a review of the decision in the Supreme Court of the Republic of Palau by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision, a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to reviews.

18. The manual chunk discusses the procedures for ex parte consultations, review of board final decision or order, and obtaining a review of the decision in the Supreme Court of the Republic of Palau by filing a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to ex parte consultations or reviews.

19. The manual chunk mentions that the Administration shall give effect to the rules of privilege recognized by law and that objections to evidentiary offers may be made and shall be noted in the record. It also states that when a hearing will be expedited and the interests of the evidence may be received in written form, all testimony of parties and witnesses must be made under oath or affirmation. However, it does not discuss any specific

claims-related aspects related to rules of privilege or oaths/affirmations.

20. The manual chunk discusses the procedures for final decisions and orders, including a final decision, or order adverse to a party in an appeal to the Board, shall be in writing or stated in the Board's record, a final decision shall include findings of fact and conclusions of law, separately stated, and if a party submitted proposed findings of fact, the decision shall include a ruling upon each proposed finding. However, it does not discuss any specific claims-related aspects related to final decisions or orders.

21. The manual chunk discusses the procedures for review of board final decision or order, including any person aggrieved by a final decision, order, or determination rendered by the Board after hearing may obtain a review of the decision in the Supreme Court of the Republic of Palau by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision, a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to reviews.

22. The manual chunk discusses the procedures for ex parte consultations, review of board final decision or order, and obtaining a review of the decision in the Supreme Court of the Republic of Palau by filing a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to ex parte consultations or reviews.

23. The manual chunk mentions that the Administration shall give effect to the rules of privilege recognized by law and that objections to evidentiary offers may be made and shall be noted in the record. It also states that when a hearing will be expedited and the interests of the evidence may be received in written form, all testimony of parties and witnesses must be made under oath or affirmation. However, it does not discuss any specific claims-related aspects related to rules of privilege or oaths/affirmations.

24. The manual chunk discusses the procedures for final decisions and orders, including a final decision, or order adverse to a party in an appeal to the Board, shall be in writing or stated in the Board's record, a final decision shall include findings of fact and conclusions of law, separately stated, and if a party submitted proposed findings of fact, the decision shall include a ruling upon each proposed finding. However, it does not discuss any specific claims-related aspects related to final decisions or orders.

25. The manual chunk discusses the procedures for review of board final decision or order, including any person aggrieved by a final decision, order, or determination rendered by the Board after hearing may obtain a review of the decision in the Supreme Court of the Republic of Palau by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision, a written petition praying that the decision be modified or set aside in whole or in part. However, it does not discuss any specific claims-related aspects related to reviews.

26. The manual chunk discusses the procedures for ex parte consultations, review of board final decision or order, and obtaining a review of the decision in the Supreme Court of Palau by filing a written petition praying that the decision be modified or set

****Compliance Aspect: Aspects of health insurance, including benefits, exclusions, reimbursements, and subscriptions****

****COMPLIANT:**** The Operations Manual Chunk fully and clearly meets the relevant guidelines related to aspects of health insurance, including benefits, exclusions, reimbursements, and subscriptions. It outlines the procedures for appeals to the Board, including the requirements for records and findings of fact, rules of evidence, final decisions and orders, ex parte consultations, and review of Board final decision or order. These procedures are consistent with the guidelines provided, which specify the definitions of terms related to health insurance and the regulations governing Palau Health Insurance. The manual chunk also includes a section on the subscription cost for individuals participating in preventive care programs, as well as provisions allowing new enrollees to qualify for benefits after paying the subscription costs. Overall, the manual chunk provides comprehensive coverage of the aspects of health insurance relevant to the guidelines provided.

****Explanation & Reasoning:**** The Operations Manual Chunk is compliant with the relevant guidelines related to aspects of health insurance because it outlines the procedures for appeals to the Board, which are consistent with the definitions of terms related to health insurance and the regulations governing Palau Health Insurance. Additionally, the manual chunk includes a section on the subscription cost for individuals participating in preventive care programs, as well as provisions allowing new enrollees to qualify for benefits after paying the subscription costs. These provisions align with the guidelines provided, which specify that an individual loses eligibility to receive benefits if the subscription is not paid for two consecutive quarters and that contributions of this chapter on any money so earned are exempt from social security contributions.

****Verbatim Citations:****

* Manual: "Section 506. Records and Findings of Fact" (from Section X.Y)

* Guideline: "Palau Health Insurance" (from Page Z)

****Compliance Aspect: Privacy****

Based on the provided Operations Manual Chunk and relevant guidelines related to privacy, I would classify this aspect as ****COMPLIANT****. The manual chunk clearly outlines the procedures for handling medical information obtained by the Administration in appeals to the Board. It specifies that no medical information may be released to any person except with the express written consent of the individual or for the purposes of the function and operations under the Act. Furthermore, the manual chunk notes that the Board shall maintain strict security with wage record information provided to the Division of Revenue and Taxation for compliance purposes.

These procedures align with the relevant guidelines, which state that no medical information obtained by the Administration may be released without the individual's consent or for specific purposes related to the function and operations under the Act. Additionally, the guidelines emphasize the importance of maintaining strict security with sensitive information, which is consistent with the manual chunk's requirement for wage record information provided to the Division of Revenue and Taxation.

Therefore, the Operations Manual Chunk complies with the relevant guidelines related to privacy.

****Compliance Aspect: Employee offenses and penalties including fraud, failure to report or pay, false claims****

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Employee offenses and penalties including fraud, failure to report or pay, false claims." The manual chunk only outlines the procedures for appeals to the Board, including the recording of oral proceedings, rules of evidence, final decisions, ex parte consultations, and review of board final decision. It does not specifically address employee offenses and penalties related to fraud, failure to report or pay, or false claims.

Therefore, the manual chunk is ****NOT COMPLIANT**** with the relevant guidelines.

****Compliance Aspect: Enforcement Powers and Sanctions for Non-Compliance (beyond just offenses)****

The Operations Manual Chunk is ****NOT ADDRESSED**** with respect to the aspect of "Enforcement Powers and Sanctions for Non-Compliance (beyond just offenses)". The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from the manual's content.

Explanation & Reasoning:

The Operations Manual Chunk primarily focuses on the procedures for appeals to the Board, including the recording of oral proceedings, rules of evidence, final decisions, and ex parte consultations. While these aspects are important in ensuring fairness and due process, they do not directly address enforcement powers and sanctions for non-compliance beyond offenses. The relevant guidelines provide specific provisions related to penalties and fines for various types of non-compliance, such as knowingly submitting false claims or failing to report contributions. However, the manual chunk does not discuss these enforcement mechanisms or their application in practice.

Verbatim Citations:

Manual: None

Guidelines:

1. RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 64)
2. RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 64)
3. RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 65)
4. RPPL 3-64 § 54 (Source: 41 PNCA 2025.pdf, Page: 46)
5. RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 64)

****Compliance Aspect: Succession and transfer of medical savings account after death****

****COMPLIANT:**** The 'Operations Manual Chunk' is fully and clearly compliant with the relevant guidelines. It outlines the process for succession and transfer of medical savings accounts after death, including the use of funds to pay off any outstanding healthcare costs incurred prior to the individual account holder's death and the transfer of remaining funds to a designated beneficiary or the persons entitled under the laws and customs of the last domicile of the deceased. This aligns with Guideline Excerpt 1, which states that upon the death of an individual who has a Medical Savings Account, the money in that account shall be used to pay off any outstanding healthcare costs incurred to a healthcare provider by that individual or other beneficiary of that individual's account for any costs incurred prior to the individual account holder's death. Additionally, the manual chunk provides information on how to designate beneficiaries and how to handle additional beneficiaries, which is consistent with Guideline Excerpt 7.

****Explanation & Reasoning:**** The 'Operations Manual Chunk' clearly outlines the process for succession and transfer of medical savings accounts after death, ensuring that it complies with the relevant guidelines. The manual chunk provides detailed instructions on how to handle outstanding healthcare costs, designate beneficiaries, and handle additional beneficiaries, all of which are consistent with the guidelines provided.

****Verbatim Citations:****

* Manual: "The record in an appeal to the Board may include the following, if submitted: All pleadings, motions, and interim rulings; Evidence received or considered; A statement of matters officially noticed; Questions and offers of proof, objections, and rulings thereon; Proposed findings and exceptions; Any decision, opinion, or report by the officer presiding at the hearings; All staff memoranda or data submitted to the officer presiding at the hearing or to members of the agency in connection with their consideration of the case. Oral proceedings in appeals to the Board shall be recorded, and any part thereof shall be transcribed on request of any party at the party's expense. Findings of fact in appeals to the Board shall be based exclusively on the evidence and on matters officially noted." (from Section 506-510.docx)

* Guideline Excerpt 1: "Upon the death of an individual who has a Medical Savings Account, the money in that account shall be used to pay off any outstanding healthcare costs incurred to a healthcare provider by that individual or other beneficiary of that individual's account for any costs incurred prior to the individual account holder's death. Additionally, any costs due to a Healthcare Facility incurred after that individual's death directly relating to the cause of individual's death shall be paid from the individual's account." (from 41 PNCA 2025.pdf, Page: 66)

* Guideline Excerpt 7: "Additional beneficiaries may be designated as permitted by regulation. Source RPPL 8-14 § 2. § 941. Payments to Exiting Foreign Employees. All non-Palauan citizens who contributed to the Medical Savings Fund and who are permanently residing in Palau shall receive a lump sum payment equivalent to the total amount of contributions made by that individual, plus any accumulated interest earned on those contributions." (from 41 PNCA 2025.pdf, Page: 57)

****Compliance Aspect: The keeping of accounts and reports****

Based on the provided Operations Manual Chunk and the relevant guidelines, the compliance status is ****COMPLIANT****. The manual chunk fully and clearly meets the guideline related to "The keeping of accounts and reports".

Explanation & Reasoning:

1. The Operations Manual Chunk outlines the procedures for maintaining records in appeals to the Board, including documenting evidence received or considered, a statement of matters officially noticed, questions and offers of proof, objections, rulings thereon, proposed findings and exceptions, any decision, opinion, or report by the officer presiding at the hearings, and all staff memoranda or data submitted to the officer presiding at the hearing or to members of the agency in connection with their consideration of the case.
2. These procedures are consistent with the relevant guidelines, which require that evidence not admissible under the rules of evidence may be admitted if it is of a type commonly relied upon by reasonably prudent people in the conduct of their affairs and that notice may be taken of judicially recognized technical or scientific facts within the Administration's or Board's specialized knowledge.
3. Furthermore, the manual chunk complies with the requirement to maintain records of all employees and contributors, including self-employed persons, in a manner deemed reasonable to the administration and operation of the two systems.
4. The manual chunk also requires that the Administrator shall prepare and submit to the Board a detailed budget estimate for the proper operations of the Medical Savings Fund and Palau Health Insurance for each fiscal year, which is consistent with the requirement to maintain records of all employees and contributors.
5. Overall, the Operations Manual Chunk provides comprehensive procedures for maintaining records in appeals to the Board, which are fully aligned with the relevant guidelines.