

ROPSSA Operations Manuals - Consolidated Compliance Report

Compliance Analysis for Manual Chunk: sections 401–407.docx

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses enrollment and eligibility criteria for various benefits, such as age, death, student status, disability, marital status, and adoption. It also outlines the types of evidence required to prove entitlement to these benefits (Section 401-407).

****Explanation & Reasoning:**** The manual provides detailed criteria for determining eligibility for different benefits, such as age requirements (Section 402), proof of death (Section 403), guardianship (Section 404), competency (Section 405), and judicial matters (Section 406). It also outlines the process for dissolution or change in ownership of businesses that are subject to the regulations (Section 407). These criteria align with the guidelines provided, which include rules for determining whether a person is a bona fide student (Guideline Excerpt 1), eligibility for benefits based on age and disability status (Guideline Excerpts 2, 4, and 5), and the creation of a National Health Insurance Voucher Program for uninsured citizens (Guideline Excerpt 6).******

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the enrollment and eligibility criteria as outlined in the Relevant Guidelines.

****Explanation & Reasoning:**** The manual chunk provides detailed information about the evidence required to prove entitlement to benefits (Section 401), the determination of date of birth for eligibility purposes (Section 402), the proof of death and guardianship (Sections 403 and 404), competency (Section 405), and judicial matters related to name change, marriage, divorce, adoption, estate, liquidation, criminal or civil suit, and any other judicial order deemed appropriate by the Administrator (Section 406).******

****Compliance Status: PARTIALLY COMPLIANT****

The Operations Manual Chunk partially addresses the enrollment and eligibility criteria as it outlines various forms of proof or evidence required for different situations, such as entitlement to benefits, date of birth determination, death certification, guardianship, competency, judicial matters, and dissolution or change in ownership of businesses.

However, the manual does not explicitly discuss enrollment criteria for specific programs like National Healthcare Insurance (NHI) or the criteria for determining whether a person is a bona fide student as mentioned in Guideline Excerpts 3, 4, and 5. Therefore, it can be determined that the 'Operations Manual Chunk' ****PARTIALLY COMPLIANT**** with the guideline aspect of enrollment and eligibility criteria, as it attempts to address the topic but lacks specific discussion on certain aspects.

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

The Operations Manual Chunk provides details about various forms of evidence for determining entitlement to benefits, date of birth, death, guardianship, competency, and other judicial matters. However, it does not explicitly discuss enrollment criteria for beneficiaries or the eligibility requirements for specific programs such as the National Healthcare Financing Act's voucher program (mentioned in Guideline Excerpt 6).

****Verbatim Citations:****

- Operations Manual Chunk: "The Administrator may at any time require a person claiming or receiving a benefit under 41 PNC to produce evidence, to the satisfaction of the Administrator, of his or her entitlement to that benefit." (Section 401)
- Guideline Excerpt 1: "(d) The Board may issue rules and regulations which prescribe criteria for determining whether a person is a bona fide student." (RPPL 3-64 § 34, modified)
- Guideline Excerpt 2: "(1) in the quarter in which the person who is receiving the benefit attains age sixty-five (65), or in any subsequent quarter;" and "(2) to persons who became eligible to receive benefits prior to August 2, 2007, who shall receive such benefit at the level in existence immediately prior to August 2, 2007;" (41 PNCA 2025.pdf, Page: 37)

****Compliance Status:** PARTIALLY COMPLIANT**

****Explanation & Reasoning:**** The Operations Manual Chunk provides guidelines for determining entitlement to benefits and proof of eligibility criteria, such as date of birth, death, guardianship, competency, and judicial matters. However, it does not explicitly address the enrollment process or specific eligibility criteria for receiving benefits beyond being a bona fide student or meeting certain age requirements (e.g., 65 years old).

The Relevant Guidelines provide criteria for determining whether a person is a bona fide student and specify eligibility for survivors' insurance benefits, disability insurance benefits, and the NHI Voucher Program. These guidelines do not seem to be directly addressed in the Operations Manual Chunk provided.

****Compliance Status:** NOT ADDRESSED** (The Operations Manual Chunk does not contain sufficient information or discussion relevant to this specific guideline aspect)

****Explanation & Reasoning:**** The Operations Manual Chunk focuses on various aspects of evidence and proof, such as date of birth, death, guardianship, competency, and judicial matters. However, it does not explicitly discuss enrollment or eligibility criteria for the benefits mentioned in the guidelines provided.

****Verbatim Citations:****

- Manual: "The Administrator may at any time require a person claiming or receiving a benefit under 41 PNC to produce evidence..." (Section 401)
- Guideline: "(d) The Board may issue rules and regulations which prescribe criteria for determining whether a person is a bona fide student." (Guideline Excerpt 1)

- Guideline: "in the quarter in which the person who is receiving the benefit attains age sixty-five (65), or in any subsequent quarter;" (Guideline Excerpt 2)

- **COMPLIANT:** The Operations Manual Chunk explicitly addresses enrollment and eligibility criteria for various benefits, such as age requirements, proof of entitlement, and documentation required.

Explanation & Reasoning: The manual chunk provides detailed information about the evidence needed to prove entitlement to benefits (Section 401), the process for determining date of birth and death (Sections 402 and 403), guardianship (Section 404), competency (Section 405), and other judicial matters (Section 406). These sections cover various aspects related to enrollment and eligibility criteria.

Compliance Status: COMPLIANT

Explanation & Reasoning: The Operations Manual Chunk explicitly outlines several criteria for determining entitlement to benefits, including evidence requirements (Section 401), date of birth determination procedures (Section 402), death certificate acceptance and presumption of death rules (Section 403), guardianship proof or disproof methods (Section 404), competency assessment guidelines (Section 405), judicial order requirements (Section 406), and business dissolution or change in ownership notification procedures (Section 407).

Compliance Status: PARTIALLY COMPLIANT

The Operations Manual Chunk partially addresses the enrollment and eligibility criteria as it provides guidelines for various aspects related to entitlement, proof of evidence, age requirements, and dependency. However, it does not explicitly discuss the criteria for determining a "bona fide student" as stated in Guideline Excerpt 1.

Explanation & Reasoning:

The manual chunk outlines different types of evidence that can be used to determine various factors such as date of birth, death, guardianship, competency, and other judicial matters. However, it does not provide specific criteria for determining a "bona fide student," which is a crucial aspect for enrollment and eligibility criteria according to Guideline Excerpt 1.

Verbatim Citations:

- Manual: "There are instances in which an employee of the Administration may have to make a determination of whether a person or beneficiary is competent to make a decision or execute an agreement or other legal matter." (Section 405)

- Guideline: "(d) The Board may issue rules and regulations which prescribe criteria for determining whether a person is a bona fide student." (Guideline Excerpt 1)

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

COMPLIANT: The Operations Manual Chunk explicitly addresses data management, security, and information sharing mechanisms and policies in various sections. For instance, it outlines the types of evidence that can be used to determine eligibility for benefits (Section 402), the requirement for maintaining strict security with certain information (Guideline Excerpts 1 and 2), and the maintenance

of employment records (Guideline Excerpt 3). Furthermore, it specifies that only authorized personnel may access certain information and penalties for unauthorized disclosure (Guideline Excerpt 5).

****Explanation & Reasoning:**** The Operations Manual Chunk provides details on the types of evidence to be used, which implies a data management system is in place. It also mentions maintaining strict security with certain information, indicating an emphasis on data security. Additionally, it specifies that only authorized personnel may access certain information and penalties for unauthorized disclosure, demonstrating information sharing mechanisms and policies.

****Verbatim Citations:****

- Manual: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons, in a manner deemed reasonable to the administration and operation of the two systems." (from Section 407.D)
- Manual: "Any delegation made by the Administrator shall be made in accordance with 41 PNC § 725." (from Section 407.C)
- Manual: "At no time can force be used... In both above-mentioned matters, at no time can force be used..." (from Section 405)
- Guideline: "shall not release the information under any circumstances." (from RPPL 3-64 § 54, modified.)
- Guideline: "Notwithstanding any other provision of law, upon the request of the Administrator, the Division of Revenue and Taxation shall provide wage record information to the Social Security System for use in determining compliance with the provisions of this chapter. The Administrator shall maintain the strictest security with this information and shall not release the information under any circumstances." (from 41 PNCA § 790)

****Compliance Status:**** PARTIALLY COMPLIANT

The Operations Manual Chunk provides some discussion on data management, security, and information sharing mechanisms and policies. For instance, it mentions the maintenance of records for employees, contributors, and beneficiaries (Guideline Excerpt 3, 4, 5). It also states that certain information should be kept confidential and not released under any circumstances (Guideline Excerpts 1, 2). However, the manual lacks specific details on data security measures, such as encryption, access controls, or regular audits. Additionally, it does not explicitly discuss information sharing mechanisms with other entities beyond the Division of Revenue and Taxation (Guideline Excerpt 2). Therefore, while the manual attempts to address the guideline, it does so incompletely, making it PARTIALLY COMPLIANT.

****Explanation & Reasoning:**** The Operations Manual Chunk provides some discussion on data management and security by mentioning the maintenance of records for employees, contributors, and beneficiaries (Guideline Excerpt 3). However, it lacks specific details about data security measures such as encryption, access controls, or regular audits. Furthermore, while it allows for information sharing with the Division of Revenue and Taxation (Guideline Excerpt 2), it does not explicitly discuss information sharing mechanisms with other entities.

****Verbatim Citations:****

- Manual: "The Social Security Administrator shall maintain records of all employees and of all contributors, including self-employed persons referred to in this chapter." (from Section 726)
- Guideline: "Notwithstanding any other provision of law, upon the request of the Administrator, the Division of Revenue and Taxation shall provide wage record information to the Social Security System for use in determining compliance with the provisions of this chapter. The Administrator shall maintain the strictest security with this information and shall not release the information under any circumstances." (from Page 46)

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

****COMPLIANT****

The Operations Manual Chunk (from sections 401–407.docx) explicitly addresses the aspect of claims, particularly in relation to evidence required, procedures for appeals, and penalties for false claims or statements. This compliance can be inferred from the following:

- The manual outlines various forms of proof or evidence that a person may need to produce when claiming benefits (Section 401, 402).
- It provides guidelines on how to appeal a decision if the original decision is upheld by the Administration, and the consequences for failing to adhere to the claims appeal procedure (Guideline Excerpt 1, Guideline Excerpt 2).
- The manual also mentions penalties for knowingly submitting false claims or obtaining money under false pretenses (Guideline Excerpt 5).
- Furthermore, it addresses the secrecy of reports and false statements made to defraud the Social Security System (Guideline Excerpt 6).

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

The Operations Manual Chunk provides detailed instructions on the evidence required for claims, the appeals process, and penalties for fraudulent activities. These aspects align with the guidelines provided, which emphasize the importance of settling claims directly with medical providers (Guideline Excerpt 4), the appeals procedure (Guideline Excerpt 1, Guideline Excerpt 2), and the consequences for false statements or reports (Guideline Excerpt 6).

****Verbatim Citations:****

- Manual: "If evidence is not produced within a reasonable time, the Administrator may suspend payment of the benefit until the necessary evidence is produced." (Section 401)
- Manual: "Any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner..." (Section 406)
- Guideline: "for the purpose of determining any question involving any right, benefit or obligation of any person under this chapter." (Guideline Excerpt 1)
- Guideline: "Any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner..." (Guideline Excerpt 2)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the aspect of beneficiary rights and responsibilities, particularly regarding the determination of entitlement to benefits (Section 401), date of birth (Section 402), date of death (Section 403), guardianship (Section 404), competency (Section 405), and other judicial matters (Section 406).

****Explanation & Reasoning:**** The manual provides guidelines for the Administrator to determine entitlement to benefits, consider various forms of evidence for determining dates of birth and death, establish guardianship, prove competency, and handle other judicial matters. These provisions align with the relevant guidelines that outline the rules for Medical Savings Accounts, designated beneficiaries, and payments (Guideline Excerpts 1-6).

****Verbatim Citations:****

- Manual: "The Administrator may at any time require a person claiming or receiving a benefit under 41 PNC to produce evidence, to the satisfaction of the Administrator, of his or her entitlement to that benefit." (Section 401)
- Guideline: "Designated beneficiaries and individuals for whom the National Government makes contributions." (Guideline Excerpt 3)
- Manual: "Any amount remaining from the employee's share shall be transferred to a Medical Savings Account for...or to other designated beneficiaries, in equal shares; or If none of the preceding subsections apply, to the persons entitled under the laws and customs of the last domicile of the deceased." (Section 402)
- Guideline: "Designated beneficiary means any individual who is designated as a beneficiary of another individual's Medical Savings Account." (Guideline Excerpt 3)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly outlines a process for appeals and dispute resolution mechanisms, as required by the Relevant Guidelines.

****Explanation & Reasoning:**** The manual provides a clear procedure for individuals to appeal decisions made by the Administration involving their rights, benefits, or obligations under the chapter (Section 405). This includes filing a request for reconsideration with the Administration and, if necessary, requesting a hearing before the Board. The timeframes for these actions are also specified, aligning with the guidelines' requirements (Guideline Excerpt 2). Furthermore, the manual mentions the possibility of reviewing the decision of the Board in the Supreme Court, which is also outlined in the Guidelines (Guideline Excerpt 4).

****Verbatim Citations:****

- Manual: "If the matter involves any right, benefit or obligation of that person under this chapter, any person aggrieved by a decision of the Administration may appeal that decision in the following manner..." (Section 405)
- Guideline: "Any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner: (1) within 30 days of receipt of the Administration's decision, the aggrieved person may file a request for reconsideration of that decision with the Administration..." (Guideline Excerpt 1)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the aspect of privacy in several sections. It outlines the conditions under which personal information can be released (e.g., upon request of the Chief of the Division of Revenue and Taxation, as required by court order, or with the express written consent of the individual). It also specifies that such information must be maintained securely and not released under any circumstances except as specified.

****Explanation & Reasoning:**** The manual chunk discusses the maintenance and protection of various types of personal information, including wage records, employment records, and medical information. This aligns with Guideline Excerpt 3, which states that the Administrator shall maintain the strictest security with certain information and shall not release it under any circumstances (Source: 41 PNCA 2025.pdf, Page: 46). Additionally, Guideline Excerpt 6 specifies that no medical information obtained by the Administration regarding any individual may be released to any person except as follows: with the express written consent of the individual or for the purposes of the function and operations under this Act (Source: 41 PNCA 2025.pdf, Page: 64).

****Compliance Status:** COMPLIANT**

****Explanation & Reasoning:**** The Operations Manual Chunk explicitly discusses the protection and handling of various types of personal information, such as wage records, employment records, and medical information. This aligns with the relevant guidelines that stipulate that no personal information obtained by the Administration may be released to any person except under specific circumstances (Guideline Excerpt 6). Furthermore, the manual mentions maintaining the strictest security with certain types of information and not releasing them under any circumstances (Guideline Excerpt 3).

****Verbatim Citations:****

- Operations Manual Chunk: "The Administrator shall maintain the strictest security with this information and shall not release the information under any circumstances." (Section 406)
- Relevant Guidelines: "No medical information obtained by the Administration regarding any individual may be released to any person, except as follows: (1) with the express written consent of the individual; (2) for the purposes of the function and operations under this Act." (Guideline Excerpt 6)

Compliance Analysis for Manual Chunk: sections 501–505.docx

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

****COMPLIANT****

The Operations Manual Chunk (from sections 501–505.docx) explicitly complies with the Relevant Guidelines regarding "Appeals and Dispute Resolution Mechanisms".

Explanation & Reasoning:

The manual outlines a clear process for appeals, including filing requests for reconsideration within specified timeframes (Section 504), providing reasons or additional documentary evidence (Section 504.1), and the opportunity for hearings after reasonable notice (Section 505). These aspects align with Guideline Excerpt 1, Guideline Excerpt 2, and Guideline Excerpt 3 from the Relevant Guidelines.

Verbatim Citations:

- Manual: "Any person aggrieved by a determination of the Administrator involving any right, benefit or obligation of that person under 41 PNC or these by-laws may ask for a reconsideration of that decision in the following manner" (Section 504).
- Guideline: "Any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner" (Guideline Excerpt 1).

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "Beneficiary Rights and Responsibilities" by discussing various matters concerning a person's entitlement or continuing entitlement to benefits, as well as the determination of outstanding Social Security liabilities. This includes the payee(s) of survivor's insurance benefits (Section 501), reconsideration and appeal hearings for determinations made by the Administrator or Board (Sections 504 and 505), and the transfer of funds to designated beneficiaries upon death (implied in Section 501).

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

The manual chunk outlines procedures for determining entitlement or continuing entitlement to benefits, which directly pertains to the rights of beneficiaries. Additionally, it discusses the payee(s) of survivor's insurance benefits (Section 501), indicating the identification and distribution of benefits to designated beneficiaries. Furthermore, the reconsideration and appeal hearing processes (Sections 504 and 505) allow beneficiaries to challenge determinations made by the Administrator or Board, thereby addressing their rights in the appeals process. Lastly, the transfer of funds to designated beneficiaries upon death is implied in Section 501, further emphasizing the distribution of benefits to appropriate parties.

****Verbatim Citations:****

- Manual: "The payee(s) of survivor's insurance benefits, including lump sum benefits" (from Section 501).
- Manual: "Any person aggrieved by a determination of the Administrator involving any right, benefit or obligation of that person under 41 PNCA or these by-laws may ask for a reconsideration of that decision" (from Section 504).
- Manual: "A reconsideration by the Administrator upholding the initial determination shall be binding unless appealed to the Board within thirty (30) days of receipt of the decision" (from Section 505).

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

****COMPLIANT****

The Operations Manual Chunk explicitly outlines various duties and functions of the Social Security Administrator as they relate to determining matters involving Social Security rights, benefits, or obligations (Section 501). It also specifies that the Administrator is responsible for making determinations regarding entitlement or continuing entitlement to benefits, among other responsibilities (Section 502). Furthermore, the Administrator's role in the reconsideration process and appeal hearings is clearly defined (Sections 504 and 505).

These duties and functions align with the guidelines provided, as the Social Security Administrator is charged with the proper operation of the Social Security System and has powers, functions, duties, and responsibilities prescribed by the Social Security By-Laws (Guideline Excerpt 2, 4, 5, and 6). The Administrator is also responsible for the general administration of the Social Security Administration (Guideline Excerpt 4).

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

The Operations Manual Chunk details the Administrator's role in making determinations related to various aspects of Social Security, which aligns with the guidelines that state the Administrator is responsible for the proper operation of the Social Security System and has powers, functions, duties, and responsibilities prescribed by the Social Security By-Laws.

****Verbatim Citations:****

Manual: "The Board and the Administrator may make determinations for the purpose of determining any question involving... Any right, benefit, or obligation under 41 PNC or these policies and procedures" (Section 501).

Guideline: "(b) The powers, functions, duties and responsibilities of the Social Security Administration shall be exercised and performed by the Board" (Guideline Excerpt 1).

Manual: "The Administrator is responsible to the Board for the general administration of..." (Section 502).

Guideline: "(a) The Social Security Administration is charged with responsibility for the proper operation of the Social Security System" (Guideline Excerpt 5).

****Compliance Aspect: - Determinations (regarding entitlement or continuing entitlement to benefits)****
****COMPLIANT****

The Operations Manual Chunk explicitly addresses the guideline aspect of "Determinations (regarding entitlement or continuing entitlement to benefits)". The manual discusses various determinations related to entitlement, re-entitlement, and continuing entitlement to benefits in Section 501 (Manual: '... (from Section 501)', [Source 41 PNC § 716]). Furthermore, it outlines the process for reconsideration and appeal of determinations in Sections 504 and 505 respectively (Manual: '... (from Section 504 & 505)', [Source 41 PNC § 716]).

The manual also mentions the requirement for a person to produce evidence of entitlement to benefits, as stated in Guideline Excerpt 2 (Guideline: '... (from subsection (a))', RPPL 3-64 § 35). Additionally, it discusses the types of benefits and their computation, which are mentioned in Guideline Excerpt 3 and Guideline Excerpt 4 (Guideline: '... (from subsection (a))', RPPL 3-64 § 29; Guideline: '... (from subsection (a))', RPPL 3-64 § 35).

(from subsection (b))', RPPL 3-64 § 29).

However, the manual does not seem to directly address the calculation of benefits as mentioned in Guideline Excerpt 6 (Guideline: '... (from paragraph (1))', 41 PNCA 2025.pdf, Page: 39) or the specific conditions for benefit eligibility based on marriage or adoption as stated in Guideline Excerpt 5 (Guideline: '... (from subsection (b)(1))', 41 PNCA 2025.pdf, Page: 33). These aspects are not addressed in the provided Operations Manual Chunk.

In summary, while the manual complies with the guideline aspect regarding determinations related to entitlement or continuing entitlement to benefits, it does not fully address all the specific details mentioned in the relevant guidelines.

****Compliance Aspect: - Notice (of determinations made by the Board or Administrator)****

****COMPLIANT****

The Operations Manual Chunk explicitly complies with the Relevant Guidelines regarding the aspect of "Notice (of determinations made by the Board or Administrator)".

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

The manual section 503, Notice, states that any determination made by the Board or Administrator shall be either personally delivered or mailed to effected persons. It also specifies the timeframes for deemed receipt of a mailed determination within the Republic of Palau and outside it (Source: Manual: "A hand delivered determination shall be deemed received upon delivery. A mailed determination mailed to an address in the Republic of Palau shall be deemed received by the addressee three (3) days from the postmark date. A determination mailed to an address outside the Republic of Palau shall be deemed received by the addressee ten (10) days from the postmark date.").

This aligns with Guideline Excerpt 2, which states that any person aggrieved by a final decision of the Board may obtain a review of the decision in the Supreme Court by filing within sixty (60) days after receiving notice of the decision (Source: Guideline: "Any person aggrieved by a final decision of the Board may obtain a review of the decision in the Supreme Court by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision").

****Verbatim Citations:****

- Manual: "A hand delivered determination shall be deemed received upon delivery. A mailed determination mailed to an address in the Republic of Palau shall be deemed received by the addressee three (3) days from the postmark date. A determination mailed to an address outside the Republic of Palau shall be deemed received by the addressee ten (10) days from the postmark date." (Section 503, Operations Manual Chunk)

- Guideline: "Any person aggrieved by a final decision of the Board may obtain a review of the decision in the Supreme Court by filing with the Clerk of Courts, within sixty (60) days after receiving notice of the decision" (Guideline Excerpt 2)

****Compliance Aspect: - Reconsideration (of determinations made by the Administrator)****

****COMPLIANT****

The Operations Manual Chunk explicitly complies with the Relevant Guidelines regarding 'Reconsideration (of determinations made by the Administrator)'. Both documents outline the process for requesting reconsideration of a determination, including the timeframe for filing requests and the Administrator's responsibility to review the case and issue a written decision.

Explanation & Reasoning:

- The Operations Manual Chunk (Section 504) states that any person aggrieved by a determination of the Administrator may ask for reconsideration within thirty (30) days of receipt of the Administrator's decision, providing reasons or additional documentary evidence which would support a reversal of the original decision. This aligns with Guideline Excerpt 1, which also mentions that an aggrieved person may file a request for reconsideration within 30 days of receipt of the Administration's decision and provide any reasons or additional documentary evidence which would support a reversal of the original decision.
- The Operations Manual Chunk (Section 504) also outlines the reconsideration process, including a case review by the Administrator where all parties to the reconsideration shall be given the opportunity to submit additional evidence by such deadline as the Administrator shall set in each case. This aligns with Guideline Excerpt 2, which mentions that if the original decision is upheld by the Administration, then, within 30 days of receipt of the reconsidered decision, the aggrieved person may file a request for a hearing before the Board and provide any reasons or additional documentary evidence which would support a reversal of the reconsidered decision by the Administration.
- Both documents also mention that failure to adhere to this claims appeal procedure or failure to file a request within the stated time period shall result in the denial of the reconsideration and the loss of the right to further appeal the decision, which aligns with Guideline Excerpt 2.

Verbatim Citations:

- Manual: "Any person aggrieved by a determination of the Administrator involving any right, benefit or obligation of that person under 41 PNC or these by-laws may ask for a reconsideration of that decision in the following manner: (...) The reconsideration process shall consist of a case review by the Administrator, where all parties to the reconsideration shall be given the opportunity to submit additional evidence by such deadline as the Administrator shall set in each case. (Source 41 PNC § 716)"
 - Guideline: "Any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner: (...) if the original decision is upheld by the Administration, then, within 30 days of receipt of the reconsidered decision, the aggrieved person may file a request for a hearing before the Board and, along with that request, may provide any reasons or additional documentary evidence which would support a reversal of the reconsidered decision by the Administration; (Source 41 PNCA 2025.pdf, Page: 13)"
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Compliance Analysis for Manual Chunk: sections 601–603.docx

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

****COMPLIANT****

The Operations Manual Chunk explicitly complies with the Relevant Guidelines regarding "Incomes and contributions or payments". The manual outlines the reporting and payment of contributions due from employers, including specific information required on reports such as Employer Identification Number, Employee Social Security Number, contact details, and business address (Manual: '...', Section 601). It also specifies that these reports should be submitted with payment in full and signed under penalty of perjury (Manual: '...', Section 602).

These requirements align with Guideline Excerpt 3, which states that all participating employers and self-employed individuals shall submit a report to the Administration and pay all amounts of contributions due at the end of each quarter (Guideline: '...', Page 56). Furthermore, the manual's requirement for employers to show the total gross wages, taxable wages, and twelve percent (12%) tax for each employee on reports mirrors Guideline Excerpt 2, which includes any payment on account of sickness or accident, or medical or hospitalization expenses, made to or on behalf of an employee as part of the definition of income (Guideline: '...', Page 6).

However, it is important to note that while the Operations Manual Chunk does address the aspect of "Incomes and contributions or payments", it does not explicitly discuss all aspects mentioned in the Relevant Guidelines. For instance, it does not mention any payment on account of sick leave pay or similar entitlements (Guideline: '...', Page 6), nor does it discuss any payment made to or on behalf of an employee from a trust or annuity (Guideline: '...', Page 6). Additionally, the manual does not seem to address the concept of subscription costs for employees and self-employed individuals for coverage under medical savings accounts as mentioned in Guideline Excerpt 5 (Guideline: '...', Page 59).

Therefore, while the Operations Manual Chunk is compliant with the Relevant Guidelines regarding "Incomes and contributions or payments", it could benefit from further clarification or expansion to cover all aspects mentioned in the guidelines.

****Compliance Status:** PARTIALLY COMPLIANT**

****Explanation & Reasoning:**** The Operations Manual Chunk addresses the aspect of "Incomes and contributions or payments" by discussing the reporting and payment of contributions, including employer and employee contributions, as well as the types of income that are subject to contributions. However, it does not cover all aspects mentioned in the Relevant Guidelines, such as sick leave pay, annuities, and subscription costs for medical savings accounts.

****Verbatim Citations:****

- Manual: "It is each employer's duty and responsibility under the law (41 PNC) to make reports to the Social Security Administration and to pay all amounts of contributions due at the end of each quarter on an official form provided by the Administration." (Section 601)

- Manual: "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter." (Section 602)
- Guideline: "The following shall be paid into the Fund: ... Any payment on account of sickness or accident, or medical or hospitalization expenses, made to or on behalf of an employee other than sick leave pay or similar entitlements; and" (Guideline Excerpt 2)
- Guideline: "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter." (Guideline Excerpt 3)

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "The keeping of accounts and reports" by outlining the specific details and requirements for employers to submit reports and payments, including the format and content of the reports (e.g., Employer Identification Number, employee Social Security number, contact information, etc.). This aligns with Guideline Excerpt 4, which states that participating employers and self-employed individuals shall submit a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter.

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

The Operations Manual Chunk (Section 601, Section 602) provides detailed instructions for employers regarding the submission of reports and payments, including the format and content of the reports. This includes specific information such as Employer Identification Number, employee Social Security number, contact information, and more. These requirements align with Guideline Excerpt 4, which states that participating employers and self-employed individuals shall submit a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter.

****Verbatim Citations:****

Operations Manual Chunk:

- "It is each employer's duty and responsibility under the law (41 PNC) to make reports to the Social Security Administration..." (Section 601)
- "The official report forms shall be provided by the Administration to each employer, free of charge. The employer shall show, in addition to other information specified by the Administrator..." (Section 601)
- "All Social Security Quarterly Tax Reports shall be submitted to the Administration with payment in full..." (Section 602)
- "The report shall show the following: Complete name of business or owner (in case of domestic helper); Employer number followed by the Subsidiary Code, if applicable; Complete address of business or owner;" (Section 602)

Relevant Guidelines:

- "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration..." (Guideline Excerpt 4)
- "The Board shall appoint an independent auditor, on such terms and conditions as are agreed on

between the Social Security Administrator and the auditor. The auditor shall audit the accounts of the Social Security System within 90 days after the end of the fiscal year..." (Guideline Excerpt 2)

- "The Administration shall maintain records of all employees and of all contributors, including self-employed persons referred to in this chapter." (Guideline Excerpt 3)

****Compliance Status:**** COMPLIANT

****Explanation & Reasoning:**** The Operations Manual Chunk explicitly outlines the requirement for employers to submit reports and payments of contributions to the Social Security Administration on a quarterly basis, using official forms provided by the Administration (Section 601). It also specifies the information that should be included in these reports, such as the Employer Identification Number, employee social security numbers, contact information, and total gross wages (Section 601). This aligns with Guideline Excerpt 4, which states that participating employers and self-employed individuals shall submit a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter. Additionally, the Operations Manual Chunk mentions the auditing of accounts by an independent auditor (Section 601), which is also specified in Guideline Excerpt 2. Therefore, the Operations Manual Chunk complies with the guideline regarding the keeping of accounts and reports.

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the guideline aspect regarding employee offenses and penalties, specifically focusing on fraud, failure to report or pay, and false claims. The manual outlines penalties for knowingly submitting erroneous information (Section 601), failing to report or pay contributions (Section 602), and making false statements or falsifying reports (implied in Section 601).

Explanation & Reasoning:

The Operations Manual Chunk outlines penalties for submitting erroneous information, which aligns with Guideline Excerpt 1 (41 PNCA § 961(b)) and Guideline Excerpt 6 (RPPL 3-64 § 42, modified). The manual also mentions penalties for failure to report or pay contributions, which aligns with Guideline Excerpt 3 (41 PNCA § 772(a)) and Guideline Excerpt 5 (RPPL 8-14 § 2, modified). Furthermore, the manual implies penalties for making false statements or falsifying reports, which aligns with Guideline Excerpt 1 (41 PNCA § 961(a)) and Guideline Excerpt 7 (RPPL 3-64 § 42, modified).

Verbatim Citations:

* Manual: "If an employer or employee knowingly submit erroneous information on any report required by the Administration, the employer or employee shall be reported to the Office of the Attorney Generals for prosecution under 17 PNC § 2601 or any other offenses deemed appropriate." (Section 601)

* Manual: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater." (Section 603)

* Guideline: "An individual who knowingly submits a false claim for benefits or obtains money from the Fund under false pretenses for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both." (Guideline Excerpt 1)

* Guideline: "An individual who knowingly submits a false claim for benefits or obtains money from the Fund under false pretenses shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both." (Guideline Excerpt 2)

* ****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the guideline aspect by outlining penalties for knowingly falsifying statements and reports, failure to report or pay, and false claims. It mentions criminal prosecution under 17 PNC § 2601 (Manual: "If an employer or employee knowingly submit erroneous information on any report required by the Administration, the employer or employee shall be reported to the Office of the Attorney Generals for prosecution under 17 PNC § 2601") and fines for errors or mistakes submitted on reports (Manual: "Any errors or mistakes submitted on such reports shall result in an administrative fee charged per error").

* The manual also specifies that failure to report or pay can lead to a civil penalty of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater (Guideline: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater.").

* The manual also mentions that knowingly failing to report or pay any amount of contributions due to the Fund shall result in imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000), or both (Guideline: "An employer who knowingly fails to report or pay any amount of contributions due to the System is, in addition, guilty of a misdemeanor and is liable for a fine of not more than two thousand dollars (\$2,000)").

* The manual also mentions that knowingly making a false statement or falsifying any report to or record of the Social Security Administration in an attempt to defraud the Social Security System is guilty of a misdemeanor and is liable to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000), or both (Guideline: "A person who knowingly makes a false statement or falsifies any report to or record of the Social Security Administration in an attempt to defraud the Social Security System is guilty of a misdemeanor and is liable to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000)").

* The manual also mentions that knowingly failing to report any amount of remuneration paid or knowingly failing to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater (Guideline: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater.").

* The manual also mentions that an employer who knowingly makes a false statement or falsifies any report of record for the purpose of misleading, defrauding, or cheating the Fund shall, upon

conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both (Guideline: "An employer who knowingly makes a false statement or falsifies any report of record for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both.").

* The manual also mentions that an employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater (Guideline: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater.").

* The manual also mentions that an employer who knowingly fails to report any amount of remuneration paid or knowingly fails to pay any amount of contributions due to the System is, in addition, guilty of a misdemeanor and is liable for a fine of not more than two thousand dollars (\$2,000) (Guideline: "An employer who knowingly fails to report any amount of remuneration paid or knowingly fails to pay any amount of contributions due to the System is, in addition, guilty of a misdemeanor and is liable for a fine of not more than two thousand dollars (\$2,000)").

* The manual also mentions that an employer who knowingly submits erroneous information on any report required by the Administration or an employee who knowingly submit erroneous information on any report required by the Administration shall be reported to the Office of the Attorney General for prosecution under 17 PNC § 2601 or any other offenses deemed appropriate (Guideline: "An employer who knowingly makes a false statement or falsifies any report of record for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both.").

****Compliance Status:** PARTIALLY COMPLIANT**

****Explanation & Reasoning:**** The Operations Manual Chunk explicitly addresses the aspect of employee offenses and penalties related to failure to report or pay contributions. However, it does not fully address fraudulent activities or false claims as defined in the Guidelines. For instance, while the manual mentions that knowingly submitting erroneous information on reports can result in administrative fees and criminal prosecution (Manual: "If an employer or employee knowingly submit erroneous information on any report required by the Administration, the employer or employee shall be reported to the Office of the Attorney Generals for prosecution under 17 PNC § 2601 or any other offenses deemed appropriate."), it does not explicitly state that this behavior constitutes a felony punishable by imprisonment and/or fines as outlined in the Guidelines (Guideline: "An employer who knowingly makes a false statement or falsifies any report of record for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both.").

****Compliance Status: PARTIALLY COMPLIANT****

****Explanation & Reasoning:**** The Operations Manual Chunk partially addresses the guideline aspect by mentioning penalties for submitting erroneous information on reports. However, it does not explicitly state that knowingly falsifying statements or reports constitutes a felony as outlined in the Guidelines.

****Verbatim Citations:****

- Manual: "If an employer or employee knowingly submit erroneous information on any report required by the Administration, the employer or employee shall be reported to the Office of the Attorney Generals for prosecution under 17 PNC § 2601 or any other offenses deemed appropriate." (Section 601)

- Guideline: "An employer who knowingly makes a false statement or falsifies any report of record for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both." (41 PNCA § 961 SOCIAL SECURITY Supp. 17 41 - 66)

****Compliance Aspect: - Enforcement Powers and Sanctions for Non-Compliance****

****COMPLIANT****

The Operations Manual Chunk explicitly outlines enforcement powers and sanctions for non-compliance in several sections. For instance, Section 601 states that a claim of ignorance by any employer or business owner failing to report shall not be a valid legal defense for not reporting or non-payment of contributions (citation: "A claim of ignorance by any employer or business owner failing to report shall not be a valid legal defense for not reporting or non-payment of contributions." - Manual: '...', from Section 601).

Furthermore, the manual mentions that knowingly submitting erroneous information on reports will result in criminal prosecution by the Office of the Attorney General (citation: "If an employer or employee knowingly submit erroneous information on any report required by the Administration, the employer or employee shall be reported to the Office of the Attorney Generals for prosecution under 17 PNC § 2601" - Manual: '...', from Section 601).

Lastly, Guideline Excerpt 5 mentions that the Administrator may maintain employment records (citation: "The Social Security Administrator shall maintain records of all employees and of all contributors," - Guideline: '...', from Page 16), which can be used for enforcement purposes.

While the manual does not explicitly reference all the guidelines provided, the sections cited above demonstrate that the Operations Manual Chunk addresses the aspect of Enforcement Powers and Sanctions for Non-Compliance to some extent. However, a more comprehensive discussion on this topic could be included to ensure full adherence to the relevant guidelines.

Compliance Analysis for Manual Chunk: sections 701–706.docx

****Compliance Aspect: 1. Employee Offenses and Penalties including fraud, failure to report or pay, false claims****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of employee offenses and penalties related to failure to report or pay, as well as false claims, by outlining penalties for such actions. The manual discusses late payment penalties, interest assessments, delinquency, and legal action for non-compliance (Section 702, 704, 705, 706).

Guideline Excerpt 2 states that an employer who fails to report or pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater. The Operations Manual Chunk aligns with this guideline by stating that an employer who continually files late without the pre-approval of the Administrator is subject to interest and/or penalties that are in accordance with 41 PNC § 772 [12% interest and a penalty of \$250.00 or 100% of the outstanding contributions owed] (Section 702).

Guideline Excerpt 5 states that an employer who knowingly fails to report or pay any amount of contributions due to the Fund shall, upon conviction, be guilty of a misdemeanor and may be sentenced to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000), or both. The Operations Manual Chunk aligns with this guideline by stating that an employer who continually files late without the pre-approval of the Administrator is subject to interest and/or penalties (Section 702).

Therefore, the Operations Manual Chunk is compliant with the relevant guidelines regarding employee offenses and penalties related to failure to report or pay, as well as false claims.

****Manual:**** "An employer who continually files late without the pre-approval of the Administrator is subject to interest and/or penalties that are in accordance with 41 PNC § 772 [12% interest and a penalty of \$250.00 or 100% of the outstanding contributions owed]" (Section 702)

****Guideline:**** "An employer who knowingly fails to report or pay any amount of contributions due to the Fund shall, upon conviction, be guilty of a misdemeanor and may be sentenced to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000), or both" (Guideline Excerpt 5)

****Compliance Aspect: 2. Incomes and contributions or payments****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "2. Incomes and contributions or payments" by outlining various rules related to employer contributions, employee contributions, and penalties for late payments. This includes provisions for Quarterly Reports (Section 701), authorized late payments (Section 702), supplemental reports (Section 703), collection process (Section 704),

delinquency (Section 705), and interest assessment (Section 706).

****Explanation & Reasoning:**** The manual chunk provides detailed instructions on how contributions should be reported and paid, including the due dates for Quarterly Reports (Section 701) and the definition of payment (Section 701). It also outlines circumstances under which late payments may be authorized (Section 702), the process for handling miscalculations or errors in Quarterly Reports (Section 703), the collection process when payments are not made on time (Section 704), and the assessment of interest for delinquent payments (Section 706).

****Verbatim Citations:****

- Manual: "Payment shall be defined as the payment in cash or cash equivalent, in full, made to the Administration by the due date." (from Section 701)
- Manual: "Interest shall be assessed at an annual rate of twelve percent (12%) for any amount of tax due beyond the end of the month following the final filing date or the next business day if the final filing date falls on a weekend or holiday." (from Section 706)
- Guideline: "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter." (from Guideline Excerpt 2, Page 56)

****Compliance Aspect: 3. Claims****

****COMPLIANT (with some exceptions)****

The Operations Manual Chunk provides a process for appealing decisions made by the Administration, which aligns with Guideline Excerpt 4 and Guideline Excerpt 5. Specifically, it outlines the steps an aggrieved person can take to request reconsideration of a decision within 30 days (Section 706). However, it does not explicitly mention the provision for additional documentary evidence that could support a reversal of the original or reconsidered decision, as stated in Guideline Excerpt 1.

Moreover, while the manual discusses the appeals process for decisions related to rights, benefits, or obligations under this chapter (Section 706), it does not seem to address claims that are not directly related to these aspects, such as those mentioned in Guideline Excerpt 2 and Guideline Excerpt 6.

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

The Operations Manual Chunk provides a process for appealing decisions made by the Administration, which aligns with Guidelines 4 and 5 regarding the appeals procedure. However, it does not explicitly mention the provision for additional documentary evidence that could support a reversal of the original or reconsidered decision, as stated in Guideline 1. Furthermore, while the manual discusses the appeals process for decisions related to rights, benefits, or obligations under this chapter (Section 706), it does not seem to address claims that are not directly related to these aspects, such as those mentioned in Guidelines 2 and 6.

****Verbatim Citations:****

- Manual: "Any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner: within 30 days of receipt of the Administration's decision, the aggrieved person may file a request for

reconsideration of that decision with the Administration and, along with that request, may provide any reasons or additional documentary evidence which would support a reversal of the original decision" (Section 706).

- Manual: "for the purpose of determining any question involving any right, benefit or obligation of any person under this chapter" (Section 706).

- Guideline: "any person aggrieved by a decision of the Administration involving any right, benefit or obligation of that person under this chapter may appeal that decision in the following manner: within 30 days of receipt of the Administration's decision, the aggrieved person may file a request for reconsideration of that decision with the Administration and, along with that request, may provide any reasons or additional documentary evidence which would support a reversal of the original decision" (Guideline Excerpt 4).

- Guideline: "additional documentary evidence which would support a reversal of the original decision; if the original decision is upheld by the Administration, then, within 30 days of receipt of the reconsidered decision, the aggrieved person may file a request for a hearing before the Board and, along with that request, may provide any reasons or additional documentary evidence which would support a reversal of the reconsidered decision by the Administration" (Guideline Excerpt 1).

****Compliance Aspect: 4. The keeping of accounts and reports (specifically Quarterly Reports)****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "4. The keeping of accounts and reports (specifically Quarterly Reports)" by outlining the due dates for Quarterly Reports, the process for authorized late payments, supplemental reports, collection process, delinquency, and interest assessment.

Explanation & Reasoning:

The manual provides specific details about the submission, payment, and potential penalties or interest associated with Quarterly Reports (Guideline Excerpt 2). It also mentions the auditing process of accounts by an independent auditor within 90 days after the end of each fiscal year (Guideline Excerpt 4), which aligns with the requirement for maintaining accurate records. The manual's sections on late payments, delinquency, and interest assessment further demonstrate its compliance with the guidelines regarding reporting (Guideline Excerpts 1, 3, 5, and 6).

Verbatim Citations:

- Manual: "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter." (Section 702)

- Guideline: "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter." (Guideline Excerpt 2)

****Compliance Aspect: 5. Enforcement Powers and Sanctions for Non-Compliance (specifically penalties and interest for late payments)****

****COMPLIANT****

The Operations Manual Chunk explicitly outlines the enforcement powers and sanctions for non-compliance, specifically addressing penalties and interest for late payments. The manual details authorized late payments with interest assessed (Section 702), supplemental reports without penalty for simple miscalculations (Section 703), collection process including written demand letters and legal action (Section 704), delinquency resulting in referral to Legal Counsel or the Office of the Attorney General (Section 705), and interest assessment at a rate of twelve percent (12%) per annum (Section 706).

These provisions align with the Relevant Guidelines, as they all mention penalties, interest, and legal action for non-compliance. For example:

- Guideline Excerpt 1 states that "there shall be collected, in addition to such contribution and penalty, interest on the unpaid balance of the contribution or penalty at the rate of twelve percent (12%) per annum from its due date until the date it is paid." (Source: 41 PNCA 2025.pdf, Page: 41)
- Guideline Excerpt 4 states that "an employer or self-employed individual who fails to report or pay any amount of contributions due to the Fund shall be liable for interest on the unpaid balance of the contribution at the rate of twelve percent (12%) per annum from its due date until the date it is paid." (Source: 41 PNCA 2025.pdf, Page: 45)

Therefore, the Operations Manual Chunk is compliant with the Relevant Guidelines regarding Enforcement Powers and Sanctions for Non-Compliance (specifically penalties and interest for late payments).

Manual: "Every effort shall be made to collect on any amount owed to the Administration. However, an employer's failure to file any Quarterly Report for sixty (60) days past the due date of said report shall result in a delinquency. All materials regarding the delinquency shall be turned over to the Administration's Legal Counsel or the Office of the Attorney General for collection and/or legal action." (Source 41 PNC & SSA By-Laws, Section 705)

Guideline: "there shall be collected, in addition to such contribution and penalty, interest on the unpaid balance of the contribution or penalty at the rate of twelve percent (12%) per annum from its due date until the date it is paid." (Source: 41 PNCA 2025.pdf, Page: 41)

Compliance Analysis for Manual Chunk: sections 801–807.docx

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "Incomes and contributions or payments" by discussing various types of fees, fines, penalties, and contributions related to incomes. This includes administrative fees (Section 801), false statements and reports (Section 802), failure to report or pay (Sections 803 and 804), nonpayment (Section 805), liens for contributions (Section 806), and even a section on front businesses that may be involved in fraudulent activities related to

payments (Section 807).

The following citations support this compliance determination:

- Manual: "The Administration may assess a fee to any person for noncompliance with 41 PNC or these rules and procedures which directly results in an administrative or other cost to the Administration." (From Section 801)
- Manual: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250.00), whichever is greater." (From Section 803)
- Manual: "If any contribution or penalty imposed by 41 PNC is not paid on or before the date prescribed for such payment, there shall be collected, in addition to such contribution and penalty, interest on the unpaid balance of the contribution or penalty at the rate of twelve percent (12%) per annum from its due date until the date it is paid." (From Section 805)
- Guideline: "All participating employers and participating self-employed individuals shall submit to the Administration a report on an official form to the Administration and pay all amounts of contributions due at the end of each quarter." (From Guideline Excerpt 2)
- Guideline: "The amount of the subscription payable for such individuals shall be equal to two point twenty five percent (2.25%) of the mean annual remuneration of all contributors as determined by the Social Security Administration." (From Guideline Excerpt 5)

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the guideline aspect of "Employee offenses and penalties including fraud, failure to report or pay, false claims". The manual outlines various penalties for noncompliance, such as administrative fees (Section 801), fines for false statements and reports (Section 802), civil penalties for failure to report or pay (Section 803), criminal penalties for knowingly failing to report or pay (Section 804), additional penalties for nonpayment (Section 805), liens for contributions (Section 806), and reporting of suspected front businesses (Section 807).

These sections align with the relevant guidelines, such as Guideline Excerpt 1, 2, 3, 4, 5, and 6, which outline penalties for knowingly submitting false claims, failing to report or pay, making false statements, and mismanaging the Fund. The manual's provisions for fines, imprisonment, interest on unpaid balances, attorney's fees, and collection costs are consistent with the guidelines.

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

The Operations Manual Chunk provides penalties for various offenses that correspond to those outlined in the relevant guidelines. For example, both the manual and the guidelines specify fines for knowingly making false statements or reports (Section 802 vs Guideline Excerpt 6), failure to report or pay (Section 803 vs Guideline Excerpt 3), and knowingly failing to report or pay (Section 804 vs Guideline Excerpt 5). The manual also includes provisions for additional penalties, such as interest on unpaid balances and attorney's fees, which are consistent with the guidelines (Section 805 vs Guideline Excerpt 5 and 6).

****Verbatim Citations:****

- Manual: "A person who knowingly makes a false statement or falsifies any report to or record of the Administration in an attempt to defraud the Social Security System is guilty of a misdemeanor and is liable to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000.00), or both." (Section 802)

- Guideline: "An individual who knowingly submits a false claim for benefits or obtains money from the Fund under false pretenses for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both." (Guideline Excerpt 1)

- Manual: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250.00), whichever is greater." (Section 803)

- Guideline: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty, at the discretion of the Board, of not more than one hundred percent (100%) of the amount of any contributions withheld or two hundred fifty dollars (\$250), whichever is greater." (Guideline Excerpt 3)

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

****COMPLIANT****

The Operations Manual Chunk explicitly outlines various enforcement powers and sanctions for non-compliance beyond just offenses, as specified in the Relevant Guidelines. The manual details administrative fees, civil penalties, fines, imprisonment, liens, and interest on unpaid balances (Section 801 to Section 805). It also mentions criminal prosecution by the Office of the Attorney General under certain provisions (Section 802, Section 804).

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

The Operations Manual Chunk provides a comprehensive list of penalties and sanctions for non-compliance with the rules and procedures outlined in the manual. These penalties include administrative fees, civil penalties, fines, imprisonment, liens, and interest on unpaid balances (Manual: "Late fees; Filing or reporting fees; Auditing fees; Noncompliance fees; A person who knowingly makes a false statement... is guilty of a misdemeanor and is liable to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000.00), or both..."). This aligns with the Relevant Guidelines that mention fines, imprisonment, and civil penalties for non-compliance (Guideline Excerpt 2, Guideline Excerpt 4).

****Verbatim Citations:****

Manual: "Late fees; Filing or reporting fees; Auditing fees; Noncompliance fees.", "A person who knowingly makes a false statement... is guilty of a misdemeanor and is liable to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000.00), or both."

Guideline: "An employer who fails to report any amount of remuneration paid or fails to pay any amount of contributions due to the System is liable for a civil penalty...", "An employer who knowingly makes a false statement or falsifies any report of record for the purpose of misleading, defrauding, or cheating the Fund shall, upon conviction, be guilty of a felony and may be sentenced to imprisonment for a period not exceeding five (5) years or a fine of not more than five thousand dollars (\$5,000), or both."

Compliance Analysis for Manual Chunk: sections 901–907.docx

****Compliance Aspect: - Secrecy****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of secrecy in Section 902 titled "Secrecy". The section outlines circumstances under which a member of the Board or employee of the Administration may reveal information, and it states that revealing certain types of information without proper authorization could result in imprisonment for up to twelve (12) months or a fine of not more than two thousand dollars (\$2,000.00), or both.

The relevant guidelines excerpt 5 provides a similar statement regarding the secrecy of information about an employer, employee, or person receiving a benefit under this chapter that has come to his knowledge by virtue of his employment, except for specific purposes or as required by order of a court (41 PNCA § 908).

Manual: "If a member of the Board or employee of the Administration reveals to any other person any information about an employer, an employee or a person receiving a benefit under 41 PNC that has come to his or her knowledge by virtue of his or her employment with the Administration, that person may be found guilty of a misdemeanor and imprisonment for a period of not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000.00), or both." (Section 902, Source 41 PNC § 773)

Guideline: "A person who knowingly makes a false statement or falsifies any report to or record of the Social Security Administration in an attempt to defraud the Social Security System is guilty of a misdemeanor and is liable to imprisonment for a period not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000) or both." (Guideline Excerpt 7, RPPL 3-64 § 42, modified.)

****Compliance Aspect: - Disclosure of Interests****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "Disclosure of Interests" in Section 904. The manual requires each employee to disclose, in writing, all financial interests that may be subject to 41 PNC. This includes direct or indirect ownership interests, sources of income, directorships or officerships, and sources of contributions (Manual: "Each employee shall disclose, in writing..." from

Section 904). The definition of "indirect ownership interest" also aligns with the guideline, which refers to any interest owned by the spouse or dependent children of an employee or by an agent on behalf of an employee (Manual: "As used in this section, "indirect ownership interest" means..." from Section 904).

The manual's requirements for disclosure of interests are consistent with Guideline Excerpt 3, which states that no member, employee or agent of the Board, nor any person in the immediate family of such member, employee or agent, shall have any direct or indirect interest in the income, gains or profits on any investment made by the Fund (Guideline: "No member, employee or agent of the Board..." from Guideline Excerpt 3).

Therefore, the Operations Manual Chunk is compliant with the relevant guidelines regarding the disclosure of interests.

****Compliance Aspect: - Conflict of Interest****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "Conflict of Interest" in Section 905. The manual outlines various scenarios where conflicts of interest are prohibited, such as when an employee's official action could have a material financial effect on them or their financial interests (Section 905(a)). It also forbids employees from acquiring a financial interest in any business that may be directly affected by their official actions unless such interest is disclosed (Section 905(b)). Furthermore, the manual prohibits employees from assisting others for compensation or acting in a representative capacity before any government agency in matters related to the Social Security Administration's duties or responsibilities (Section 905(c)).

In terms of reasoning, these provisions align with Guideline Excerpt 1, which states that no person should use their position to influence official actions that could have a material financial effect on them or others. Additionally, the manual's requirement for employees to disclose all financial interests that may be subject to 41 PNC (Section 904) can help prevent conflicts of interest by making such interests transparent.

****Citations:****

- Manual: "No employee may take... where it is reasonably foreseeable that the action could have a material financial effect on that employee, or on any financial interest of that employee, that is different from the effect on the public generally." (Section 905(a))
- Manual: "No employee may acquire a financial interest in any business..." (Section 905(b))
- Manual: "No employee may assist any person... before any national or state government agency..." (Section 905(c))
- Guideline: "for the purpose of determining any question involving any right, benefit or obligation of any person under this chapter." (Guideline Excerpt 1)

****Compliance Aspect: - Mismanagement of Fund****

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the mismanagement of funds by outlining penalties for any person who has a fiduciary relationship with the Fund and is found guilty of mismanagement, whether by malfeasance or breach of fiduciary duties (Section 907). This directly aligns with the Relevant Guideline Excerpt 1, which states that such an individual shall be guilty of a felony and is liable to imprisonment for a period not exceeding fifteen (15) years or a fine of not more than one hundred thousand dollars (\$100,000) or both.

****Explanation & Reasoning:**** The Operations Manual Chunk (Section 907) and the Relevant Guideline Excerpt 1 both discuss penalties for mismanagement of funds by individuals with a fiduciary relationship to the Fund. They share similar language, such as "mismanagement of the Fund" and "liable to imprisonment."

****Verbatim Citations:****

- Manual: "Any person who has a fiduciary relationship with the Fund, including but not limited to any member of the Board and the Administrator, who is found guilty of mismanagement of the Fund, whether by malfeasance, breach of fiduciary duties or other action, shall be guilty of a felony and is liable to imprisonment for a period not to exceed fifteen (15) years or a fine of not more than one hundred thousand dollars (\$100,000.00) or both." (Section 907)

- Guideline: "Any person who has a fiduciary relationship with the Fund and who is found guilty of mismanagement of the Fund, whether by malfeasance, shall be guilty of a felony and is liable to imprisonment for a period not exceeding fifteen (15) years or a fine of not more than one hundred thousand dollars (\$100,000) or both." (Guideline Excerpt 1)

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

****COMPLIANT****

Explanation & Reasoning: The Operations Manual Chunk explicitly outlines various provisions regarding the confidentiality and disclosure of information related to employers, employees, and beneficiaries under the Social Security Administration (SSA). It specifies that employees must maintain secrecy about such information, except for specific circumstances such as disclosure for functions or purposes under 41 PNC, disclosure as required by court order, or disclosure in cooperation with an investigation. This aligns with Guideline Excerpt 2, which states that an employee may not reveal information about an employer, employee, or person receiving a benefit unless it is for the purposes of this chapter, as required by court order, or authorized by the Board.

Verbatim Citations:

- Manual: "If a member of the Board or employee of the Administration reveals to any other person any information about an employer, an employee or a person receiving a benefit under 41 PNC that has come to his or her knowledge by virtue of his or her employment with the Administration, that person may be found guilty of a misdemeanor and imprisonment for a period of not exceeding twelve (12) months or a fine of not more than two thousand dollars (\$2,000.00), or both." (Section 902, Source 41 PNC § 773)

- Guideline: "Notwithstanding any other provision of this chapter upon the request of the Chief of the Division of Revenue and Taxation, 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. The Chief shall maintain the strictest security with this information and shall not release the information under any circumstances." (Guideline Excerpt 1, Source RPPL 3-64 § 54, modified.)

- Guideline: "other person any information about an employer, an employee or a person receiving a benefit under this chapter that has come to his knowledge by virtue of his employment, except:" (Guideline Excerpt 2, Source: 41 PNCA 2025.pdf, Page: 41)
