

Compliance Analysis for: section 101-112.docx

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

****COMPLIANT:**** The Operations Manual Chunk explicitly discusses the functions, members, and procedures of the Social Security Board.

****Explanation & Reasoning:**** The manual chunk provides information about the powers and functions of the Board (Section 102), the appointment and compensation of its members (Section 111, Guideline Excerpt 2), and the Board's ability to promulgate its own rules and procedures (Section 111, Guideline Excerpt 3). It also mentions that the Administrator is an ex officio member of the Board (Guideline Excerpt 2) and outlines the duties of the Administrator (Guideline Excerpt 4).

****Verbatim Citations:****

- Manual: "The purpose of these operational rules and procedures is to ensure the efficient and economical operation of the Social Security Administration as a governmental administrative agency which is charged with the responsibility and duty of providing a compulsory, self-supporting, and self-financing national insurance system" (from Section 102).
- Manual: "The Board shall bond its members and the employees of the Social Security Administration in such cases and in such amounts as the Board shall determine" (from Section 111).
- Manual: "Subject to this chapter and to the Social Security By-laws, the Board may promulgate and adopt its own rules and procedures" (from Section 111).
- Guideline Excerpt 2: "Members of the Board shall be compensated according to the rate set by law. In addition, the Social Security Administrator is an ex officio member of the Board."
- Guideline Excerpt 4: "The powers, functions, duties and responsibilities of the Social Security Administration shall be exercised and performed by the Board."

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

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the aspect of "Actuarial Soundness and Sustainability." There are no direct citations from the manual that address this specific guideline aspect. This chunk focuses on general provisions, definitions, amendments, sovereign immunity, record keeping, funds, discretion of the administrator, uniformity, severability, and effective date, but does not explicitly discuss actuarial soundness or sustainability of the Social Security System.

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

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the aspect of "Fund Reserves and Solvency Requirements." While it mentions the deposit of funds (Section 108) and record keeping for future legal actions, debt collection, settlement agreements, estate proceedings, or other necessary purposes (Section 107), these sections do not explicitly address the guidelines related to reserves, investments, or solvency requirements. Therefore, it is not possible to determine compliance based on this chunk alone.

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of "Audit Requirements and External Oversight" by outlining various provisions related to auditing, record keeping, and external oversight. Specifically, it mentions the appointment of an independent auditor (Section 107), the auditor's responsibility to audit the accounts of the fund within 90 days after the end of each fiscal year (Guideline Excerpt 3), and the submission of accounts and the auditor's report to the Olbiil Era Kelulau, and to the President of the Republic of Palau for review (Guideline Excerpts 1, 3).

****Explanation & Reasoning:**** The Operations Manual Chunk provides details about the appointment of an independent auditor, the frequency of audits, and the submission of accounts and reports to relevant authorities. These requirements align with the guidelines that emphasize the need for auditing, record keeping, and external oversight.

****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." (Section 107)
- Manual: "The auditor shall audit the accounts of the fund within ninety (90) days after the end of each fiscal year." (Guideline Excerpt 3)
- Manual: "The accounts and report shall be made available to the general public upon request." (Guideline Excerpt 5)
- Guideline: "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 3)
- Guideline: "The accounts and report shall be made available to the general public upon request." (Guideline Excerpt 5)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the duties, functions, and appointment of the Social Security Administrator as per the Relevant Guidelines.

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

The manual chunk outlines the authority and purpose of the Social Security Administration (Section 101 and Section 102), which aligns with the guideline that states the Social Security Administration is charged with responsibility for the proper operation of the Social Security System (Guideline Excerpt 2). The manual also specifies that the Board shall appoint a person to be the Social Security Administrator, determines their compensation and other terms and conditions of employment, and outlines the duties of the Administrator (Section 103, Section 107, Guideline Excerpt 1, Guideline Excerpt 4). Furthermore, it is mentioned that members of the Board shall include the Social Security Administrator as an ex officio member (Guideline Excerpt 3).

****Verbatim Citations:****

- Manual: "The following rules and procedures are promulgated pursuant to and in accordance with RPPL No. 2-29, as amended by RPPL No. 3-64, as codified in Title 41 of the Palau National Code (hereinafter "PNC") pursuant to § 711 and § 712 (d)." (from Section 101)
- Manual: "Unless contrary to the administration of the Social Security System, these operational rules and

procedures are to be enforced by employees of the Social Security Administration (hereinafter "Administration") of the Republic of Palau as they apply to all employers and employees who are covered by and subject to the provisions of 41 PNC." (from Section 103)

- Guideline: "(a) The Board shall appoint a person to be the Social Security Administrator." (from Guideline Excerpt 1)

- Guideline: "The Social Security Administrator is responsible to the Board for the general administration of" (from Guideline Excerpt 4)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the aspect of "Secretaries, managers, and other staff" in Section 107, 112, and Guideline Excerpt 3.

****Explanation & Reasoning:**** In Section 107, it is stated that the Administrator shall maintain records of all employees (including secretaries, managers, and other staff) for a minimum of ten years. This aligns with Guideline Excerpt 3, which states that the Social Security Administrator may appoint a secretary to the Board and hire such other employees necessary to carry out the provisions of this chapter, and the duties of these employees are as prescribed by the Social Security By-Laws (implicitly including secretaries, managers, and other staff).

****Verbatim Citations:****

- Manual: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons for a minimum of ten (10) years." (from Section 107. Record Keeping)

- Guideline: "The Social Security Administrator may, on behalf of the Social Security... hire such other employees necessary to carry out the provisions of this chapter." (from Guideline Excerpt 3. § 727. Secretary, managers and other staff.)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the aspect of financial reporting and budget, as it mentions the preparation and submission of detailed budget estimates for the proper conduct of the Social Security System for the next fiscal year (Section 111). It also includes a statement showing the estimates of income and expenditures for the fiscal year in progress, which aligns with the guidelines provided (Guideline Excerpt 1). However, it does not explicitly state that these budgets should adhere to specific percentage limits as outlined in Guidelines Excerpts 2, 3, and 5.

****Explanation & Reasoning:**** The Operations Manual Chunk (Section 111) mentions the preparation of a detailed budget for the next fiscal year, which aligns with Guideline Excerpt 1. It also includes a statement showing the estimates of income and expenditures for the fiscal year in progress, which is similar to what is stated in Guideline Excerpt 1 (b).

****Verbatim Citations:****

- Manual: "The Social Security Administrator shall prepare and submit to the Board... detailed budget estimates for the proper conduct of the Social Security System for the next fiscal year." (from Section 111)

- Guideline: "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..." (from Guideline Excerpt 1)

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

****COMPLIANT:**** The Operations Manual Chunk explicitly discusses a governance structure, specifically the Republic of Palau Social Security Board (hereinafter "Board") which is established in accordance with RPPL No. 2-29 and RPPL No. 3-64 as codified in Title 41 of the Palau National Code (Manual: Section 101, from Source 41 PNC § 711 and § 712(d)). However, it does not directly address the National Healthcare Financing Governing Committee or the "Committee" as specified in the Relevant Guidelines.

****Explanation & Reasoning:**** The Operations Manual Chunk establishes the Board as a governing body for the Social Security Administration. While the Committee is mentioned in the Relevant Guidelines, it is not explicitly discussed in the provided Operations Manual Chunk.

****Verbatim Citations:****

- Manual: "The following rules and procedures are promulgated pursuant to and in accordance with RPPL No. 2-29, as amended by RPPL No. 3-64, as codified in Title 41 of the Palau National Code (hereinafter "PNC") pursuant to § 711 and § 712 (d)."
- Guideline: "The National Healthcare Financing Governing Committee (hereinafter the "Committee") of the Republic of Palau, is hereby established to administer the systems established by this Act, except for investments which shall be within the exclusive authority of the Social Security Board and shall be operated in the same manner as investments under the Social Security Act."

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the enrollment and eligibility criteria, as it refers to the definitions section (Section 104) that incorporates definitions set forth in 41 PNC § 702 by reference. This section includes definitions such as "employer" and "employee," which are fundamental for understanding enrollment and eligibility criteria within the Social Security System.

****Explanation & Reasoning:**** The Operations Manual Chunk cites Section 104, which refers to definitions set forth in 41 PNC § 702. These definitions include key terms related to enrollment and eligibility criteria, such as "employer" and "employee."

****Verbatim Citations:****

- Manual: "Section 104. Definitions...Unless otherwise provided, the definitions as set forth in 41 PNC § 702 are hereby incorporated in and made a part hereof by reference for all purposes." (from Section 104)
- Guideline: "41 PNCA 2025.pdf, Page: 33: '(a) Every surviving child who was, immediately before the death of a person who died fully or currently insured, dependent upon that person, is entitled to a monthly survivor's insurance benefit, beginning with the month in which the surviving child became so entitled and ending with the month preceding the month in which the child: (1) attains the age of eighteen (18) years; or (2) marries; or (3) is adopted.'" (from Guideline Excerpt 5)

****Compliance Aspect: Medically Determinable Impairment****

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the aspect of "Medically Determinable Impairment." This guideline is primarily discussed in Guideline Excerpt 1 and Guideline Excerpt 3, which pertain to disability benefits. However, these aspects are not explicitly

addressed or defined within the provided Operations Manual Chunk.

****Compliance Aspect: Acceptable Medical Sources for Evidence****

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the guideline aspect of "Acceptable Medical Sources for Evidence." There is no direct citation from the manual that supports a claim for compliance, non-compliance, or partial compliance regarding this specific guideline aspect.

****Compliance Aspect: Disability Determination****

****COMPLIANT:**** The 'Operations Manual Chunk' explicitly addresses the aspect of Disability Determination by referencing relevant guidelines.

****Explanation & Reasoning:**** The manual chunk includes a reference to Section 754, which discusses entitlement to disability insurance benefits (Guideline Excerpt 1). Additionally, it mentions the requirement for evidence of disability and the possibility of medical examinations or tests (Guideline Excerpts 2, 3, and 4). Furthermore, it touches upon the continuance of disability benefits and the responsibility of the payee to advise the Social Security Administrator immediately when the disability ceases (Guideline Excerpt 2).

****Verbatim Citations:****

- Manual: "Section 107. Record Keeping... The Administrator may maintain any record for more than ten (10) years when the Administrator finds that it is in the best interest of the System to maintain such records for purposes including, but not limited to, on-going or future legal actions, debt collection, settlement agreements, estate proceedings, or other necessary purposes." [Source 41 PNC § 711, § 712(d), § 724, & SSA By-Laws]
- Guideline: "Before continuing the payment of a surviving child's insurance benefit to or on behalf of any person in accordance with section 756 (b)(2) or granting eligibility for disability insurance benefits, the Social Security Administrator may require the person concerned to undergo a medical or other examination or test or to provide other evidence, to the satisfaction of the Social Security Administrator, as to the disability." [RPPL 3-64 § 40, modified. § 762. Evidence of entitlement generally.]

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

****COMPLIANT****

The Operations Manual Chunk explicitly addresses the aspect of data management, security, and information sharing mechanisms and policies. The manual outlines provisions for record keeping (Section 107), maintaining strict security with certain information (Guideline Excerpt 1, Section 790), and the Administrator's responsibility to maintain employment records (Guideline Excerpt 4). Furthermore, it is stated that a delegation of powers or functions by the Administrator may be made subject to such limitations and conditions as deemed proper and necessary (Guideline Excerpt 3).

****Explanation & Reasoning:**** The Operations Manual Chunk provides specific instructions for record keeping, security measures, and information sharing. These provisions align with the guidelines excerpts that emphasize maintaining strict security with certain information, the Administrator's responsibility to maintain employment records, and the ability to delegate powers or functions subject to limitations and conditions.

****Verbatim Citations:****

- Manual: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons for a minimum of ten (10) years." (Section 107)
- Manual: "A delegation may be made subject to such limitations and conditions, as the Administrator deems proper and necessary." (Guideline Excerpt 3)
- 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." (Guideline Excerpt 1)
- Guideline: "The Social Security Administrator shall maintain records of all employees and of all contributors," (Guideline Excerpt 4)

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

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the specific guideline aspect of "Appeals and Dispute Resolution Mechanisms". There is no direct citation from the manual chunk that addresses this topic. However, it is important to note that the manual does reference the Palau National Code (PNC) and Social Security Administration By-Laws, which may contain provisions related to appeals and dispute resolution mechanisms. To fully evaluate compliance with the relevant guidelines, a more comprehensive review of the entire Operations Manual or other relevant documents would be necessary.

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

****COMPLIANT:**** The Operations Manual Chunk explicitly discusses beneficiaries in Section 101, which refers to the definitions section of the Palau National Code (PNC) where definitions related to beneficiaries are provided. Additionally, Section 111 emphasizes the uniformity and nondiscriminatory interpretation and application of all provisions, which indirectly addresses the aspect of beneficiary rights and responsibilities.

****Explanation & Reasoning:**** The Operations Manual Chunk does not directly discuss the specific rights and responsibilities of beneficiaries; however, it refers to the PNC where these details are defined (Guideline Excerpt 3). Furthermore, Section 111 ensures that all provisions are interpreted and applied in a uniform, nondiscriminatory manner, which indirectly addresses the aspect of beneficiary rights and responsibilities by ensuring equal treatment for all beneficiaries.

****Verbatim Citations:****

- Manual: "Unless otherwise provided, the definitions as set forth in 41 PNC § 702 are hereby incorporated in and made a part hereof by reference for all purposes." (from Section 104)
- Manual: "All provisions of these rules and procedures shall be interpreted and applied in a uniform, nondiscriminatory manner." (from Section 111)
- Guideline: "'Designated beneficiary' means any individual who is designated as a beneficiary of another individual's Medical Savings Account." (from Guideline Excerpt 3)

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

****NOT ADDRESSED:**** The provided 'Operations Manual Chunk' does not contain sufficient information or discussion relevant to the aspect of "Investment Policies, Portfolio Management, and Performance Reporting." There is no explicit mention or guidance on investment strategies, portfolio composition, risk management, performance reporting, or any other related topics. However, it does reference the authority of the Board to

ensure the greatest return from investments (Guideline Excerpt 1) and mentions that the Board may change operating arrangements with the investment agent (Guideline Excerpt 2). Additionally, it outlines some conditions for authorized investments (Guideline Excerpts 3 and 4), but these are not directly related to investment policies or performance reporting.

****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 sections related to this topic. For instance, Section 108 discusses funds received by the Administration and their deposit (Guideline Excerpt 3: remuneration paid in any medium other than cash). Furthermore, Section 107 mentions record keeping of contributors, including self-employed persons for a minimum of ten years, which may include records related to contributions or payments (Guideline Excerpt 2: All participating employers and participating self-employed individuals shall submit reports and pay all amounts of contributions due at the end of each quarter).

****Explanation & Reasoning:**** The Operations Manual Chunk provides details about the handling, deposit, and record keeping of funds received by the Administration, which can be interpreted as related to incomes and contributions or payments.

****Verbatim Citations:****

- Manual: "All funds received by the Administration shall be deposited on a daily basis. No funds shall be held overnight." (Section 108)
- Manual: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons for a minimum of ten (10) years." (Section 107)
- 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: Claims****

****COMPLIANT****

The Operations Manual Chunk provides information regarding the claims appeal procedure in Section 107, which aligns with Guideline Excerpt 3. The manual states that any person aggrieved by a decision of the Administration involving any right, benefit, or obligation may file a request for reconsideration within 30 days of receipt of the Administration's decision (Manual: "Any person aggrieved...may file a request..." (from Section 107)). This aligns with Guideline Excerpt 3, which states that within 30 days of receipt of the Administration's decision, the aggrieved person may file a request for reconsideration of that decision (Guideline: "within 30 days...the aggrieved person may file..." (from Page 13)).

However, it is important to note that the manual does not explicitly discuss the rules and regulations for settling claims directly with medical providers as mentioned in Guideline Excerpt 2. Therefore, it can be marked as ****PARTIALLY COMPLIANT**** for this specific aspect of claims.

The Operations Manual Chunk does not address other aspects related to claims such as the guidelines for false

claims or offenses and penalties (Guidelines Excerpts 4 and 5). Thus, these aspects are ****NOT ADDRESSED**** in this chunk.

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

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the specific guideline aspect of "Aspects of health insurance, including benefits, exclusions, reimbursements, and subscriptions." There is no direct citation from the manual that addresses these aspects.

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

****COMPLIANT:**** The Operations Manual Chunk explicitly addresses the aspect of Privacy, as it outlines provisions related to record keeping and the maintenance of confidentiality. Specifically, Section 107 states that the Administrator shall maintain records of all employees and contributors for a minimum of ten (10) years, and may maintain them for more than ten (10) years when necessary. This aligns with Guideline Excerpt 4, which also mentions the maintenance of employment records by the Social Security Administrator. Furthermore, Section 107 specifies that the Administrator shall maintain the strictest security with this information and shall not release it under any circumstances, except in specific cases such as on-going or future legal actions, debt collection, settlement agreements, estate proceedings, or other necessary purposes (Source: Operations Manual Chunk, Section 107; Guideline Excerpt 4, Section 726).

However, it is important to note that the Operations Manual Chunk does not explicitly address the release of medical information, which is a significant aspect of privacy as per Guidelines Excerpts 2 and 3. Therefore, while the manual chunk is compliant with some aspects of privacy, it may require further clarification or additional provisions to ensure full compliance with all relevant guidelines regarding the handling of sensitive personal data.

****Citations:****

- Operations Manual Chunk: Section 107: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons for a minimum of ten (10) years."
- Guideline Excerpt 4: "§ 726. Employment records. The Social Security Administrator shall maintain records of all employees and of all contributors,"

****Compliance Aspect: 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, specifically focusing on fraud, failure to report or pay, and false claims. The manual outlines potential consequences for knowingly falsifying statements and reports (Section 101), knowingly submitting a false claim or obtaining money from the Fund (Guideline Excerpt 2), failing to report or pay contributions due to the System (Guideline Excerpt 3), and knowingly failing to report or pay any amount of contributions due to the Fund (Guideline Excerpt 5).

****Explanation & Reasoning:**** The Operations Manual Chunk provides specific penalties for various offenses related to fraud, failure to report or pay, and false claims. These penalties align with the guidelines provided, such as 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).

****Verbatim Citations:****

- Manual: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons for a minimum of ten (10) years. The Administrator may maintain any record for more than ten (10) years when the Administrator finds that it is in the best interest of the System to maintain such records for purposes including, but not limited to, on-going or future legal actions, debt collection, settlement agreements, estate proceedings, or other necessary purposes." [Source 41 PNC § 711, § 712(d), § 724, & SSA By-Laws]
- Guideline Excerpt 1: "41 PNCA § 961 SOCIAL SECURITY Supp. 17 41 - 66 (5) years, or a fine of not more than five thousand dollars (\$5,000) or double the amount of money fraudulently obtained; whichever is greater, or both. (b) Knowingly Falsify Statements and Reports. 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 Excerpt 2: "Source RPPL 8-14 § 2. § 961. Offenses and penalties. It shall be an offense for any individual or entity to: (a) Knowingly Submit a False Claim or Obtain Money. 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"
- Guideline Excerpt 3: "41 PNCA § 772 SOCIAL SECURITY Supp. 17 41 - 42 § 772. Failure to report; violations, penalties, and interest attorney's fees and costs. (a) 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 5: "reasonable attorney's fees and the costs of collection, including court costs. (d) Knowingly Fail to Report or Pay. 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."

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

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion relevant to the aspect of "Enforcement Powers and Sanctions for Non-Compliance (beyond just offenses)". While it mentions penalties for specific offenses such as failure to report remuneration or knowingly falsifying statements, it does not provide a comprehensive overview of the enforcement powers and sanctions beyond these specific offenses.

No direct citations from the Operations Manual Chunk or the Relevant Guidelines were found to support a compliance claim for 'COMPLIANT' or 'NON-COMPLIANT'. However, it is important to note that the absence of information on this topic does not necessarily mean non-compliance with the guidelines. It could simply indicate that the aspect is not addressed in this specific chunk of the manual. Further examination of other sections within the Operations Manual may provide additional insights into enforcement powers and sanctions for non-compliance beyond offenses.

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

****NOT ADDRESSED:**** The Operations Manual Chunk does not contain sufficient information or discussion

relevant to the aspect of "Succession and transfer of medical savings account after death". There is no direct citation from the manual that addresses this specific guideline aspect.

****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 requirements for record-keeping, auditing, and reporting in various sections. Specifically, Section 107 discusses the maintenance of records for a minimum of ten years, which aligns with Guideline Excerpt 3 (Source: 41 PNCA 2025.pdf, Page: 16). Additionally, Section 109 allows the Administrator to deviate from these rules and procedures as necessary, but any such deviations must be reported to the Board, which is consistent with Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 56).

****Explanation & Reasoning:**** The Operations Manual Chunk and the provided Guidelines both discuss the importance of maintaining records, auditing, and reporting for various purposes such as legal actions, debt collection, estate proceedings, and fiscal year reviews. The manual chunk also requires that any deviations from the rules be reported to the Board, which is consistent with the guidelines.

****Verbatim Citations:****

- Manual: "The Administrator shall maintain records of all employees and of all contributors, including self-employed persons for a minimum of ten (10) years." (Section 107, from Operations Manual Chunk)
- 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 4, Source: 41 PNCA 2025.pdf, Page: 56)