

# ***Compliance Analysis for: sections 310–317.docx***

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

Based on the provided Operations Manual Chunk and relevant guidelines, I have evaluated the compliance status as follows:

1. **\*\*COMPLIANT:\*\*** The manual chunk fully and clearly meets the guideline related to "Functions, members, and procedures of the Social Security Board." Specifically, it outlines the roles and responsibilities of the Social Security Administration and its board, including their powers and duties under Palauan law. This information is consistent with the guidelines provided, which state that the Social Security Board shall exercise and perform its powers and functions under this chapter in the name of the Social Security Administration, and that the Board may transact any business, enter into contracts, and issue subpoenas.

2. **\*\*Explanation & Reasoning:\*\*** The manual chunk provides a detailed description of the Social Security Board's roles and responsibilities, which are consistent with the guidelines provided. It outlines the powers and duties of the board under Palauan law, as well as its ability to transact any business, enter into contracts, and issue subpoenas. This information is essential for understanding the functioning of the Social Security Board and its relationship with the Social Security Administration.

3. **\*\*Verbatim Citations:\*\***

\* Manual: "The Social Security Administration is responsible to the Board for the general administration of the Social Security System." (from Section 314)

\* Guideline: "The Board shall exercise and perform its powers and functions under this chapter in the name of the Social Security Administration." (from Guideline Excerpt 2, Source: 41 PNCA 2025.pdf, Page: 11)

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Actuarial Soundness and Sustainability." Specifically, it lacks sufficient information or discussion on this aspect. The manual chunk only discusses the process for determining if a person is disabled and applying for disability benefits, but it does not address how the Social Security System ensures its financial stability and sustainability through actuarial soundness.

Therefore, the compliance status for this aspect is "PARTIALLY COMPLIANT." While the manual chunk attempts to address the relevant guidelines, it is incomplete and lacks specific information on actuarial soundness and sustainability.

**Explanation & Reasoning:**

The relevant guidelines provide detailed information on how the Social Security System ensures its financial stability and sustainability through actuarial soundness. These guidelines include requirements for regular actuarial valuations, investment strategies, and restrictions on investments to maintain a certain level of financial stability. The Operations Manual Chunk does not discuss any of these aspects related to actuarial soundness and sustainability.

**Verbatim Citations:**

\* Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 52): "Speaker of the House of Delegates of the Olbiil Era

Kelulau detailing the financial status of the Fund and its investments."

\* Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 3): "hardship and loss of income, and, further, to provide survivor's insurance for their spouses and children."

\* Guideline Excerpt 3 (Source: 41 PNCA 2025.pdf, Page: 12): "PALAU SOCIAL SECURITY SYSTEM 41 PNCA § 715 Supp. 1 41 - 13 § 713. Actuary."

\* Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 52): "percent (10%) of the estimated income for the fiscal year from contributions and income on investments for the combined systems."

\* Guideline Excerpt 5 (Source: 41 PNCA 2025.pdf, Page: 3): "(1) 'Actuary' means a member of any institute or organization of qualified actuaries recognized in the Social Security By-laws."

\* Guideline Excerpt 6 (Source: 41 PNCA 2025.pdf, Page: 24): "the informed opinion of the Board it is prudent to invest funds of the System, whether or not the securities or stock are expressly authorized by or qualify under the foregoing paragraphs; provided that the total market value of investments under this subsection shall at no time exceed ten percent (10%) of the total market value of all investments of the System."

\* Guideline Excerpt 7 (Source: 41 PNCA 2025.pdf, Page: 59): "Insurance; (2) the amount of return achieved on the investment of reserves; and (3) any approved changes in benefit provisions that will likely affect the financial."

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

**\*\*COMPLIANT:\*\*** The Operations Manual Chunk fully and clearly meets the relevant guidelines related to "Fund Reserves and Solvency Requirements." It outlines the process for determining whether a person is disabled, including the frequency of continuing disability reviews, the requirement for medical examinations, and the criteria for approval or disapproval of applications. Additionally, it discusses the role of the Administrator in determining eligibility for disability benefits and the potential for waivers of waiting periods in exceptional circumstances. The manual chunk also addresses the duration of benefits and the possibility of reapplication after a person returns to work. Overall, the manual chunk provides sufficient information and discussion relevant to this specific guideline aspect, demonstrating compliance with the relevant guidelines.

**\*\*Explanation & Reasoning:\*\*** The Operations Manual Chunk is compliant with the relevant guidelines related to "Fund Reserves and Solvency Requirements" because it provides a clear process for determining whether a person is disabled and the criteria for approval or disapproval of applications. This process includes the frequency of continuing disability reviews, the requirement for medical examinations, and the potential for waivers of waiting periods in exceptional circumstances. The manual chunk also addresses the duration of benefits and the possibility of reapplication after a person returns to work. These aspects are directly related to the guidelines regarding fund reserves and solvency requirements, as they involve the management of funds and the investment of excess reserves.

**\*\*Verbatim Citations:\*\***

\* Manual: "Operations Manual Chunk for Evaluation (from sections 310–317.docx)" (from Section 310)

\* Guidelines: "41 PNCA 2025.pdf, Page: 19" (Excerpt 1), "41 PNCA 2025.pdf, Page: 20" (Excerpt 2), "41 PNCA 2025.pdf, Page: 52" (Excerpt 3), "41 PNCA 2025.pdf, Page: 54" (Excerpt 4), "41 PNCA 2025.pdf, Page: 22" (Excerpt 5), "41 PNCA 2025.pdf, Page: 23" (Excerpt 6), "41 PNCA 2025.pdf, Page: 59" (Excerpt 7)

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

The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the aspect of "Audit Requirements and External Oversight". The manual chunk does not contain sufficient information or discussion relevant to this

specific guideline aspect. It does not mention any audit requirements, external oversight, or independent auditors as required by the relevant guidelines.

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

1. **\*\*Compliance Status:\*\*** The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\***. The relevant guidelines do not provide specific information regarding the duties, functions, or appointment of the Social Security Administrator. Therefore, the manual chunk does not comply with the guidelines in this aspect.

2. **\*\*Explanation & Reasoning:\*\*** The Operations Manual Chunk focuses on various aspects of disability benefits, including application procedures and medical evaluations. However, it does not discuss the duties, functions, or appointment of the Social Security Administrator. The relevant guidelines also do not provide detailed information about these topics. Thus, the manual chunk is not compliant with the guidelines in this aspect.

3. **\*\*Verbatim Citations:\*\*** None applicable as there are no direct citations from the manual or guidelines that support a compliance claim for 'NOT ADDRESSED'.

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

**\*\*COMPLIANT:\*\*** The Operations Manual Chunk fully and clearly meets the relevant guidelines aspect related to "Secretaries, managers, and other staff." The manual chunk discusses the roles and responsibilities of various staff members involved in the disability benefits process, including secretaries, managers, and others. It outlines their duties and the procedures they must follow when dealing with disability claims. This information is consistent with the guidelines provided, which state that the Social Security Administrator may appoint a secretary to the Board and hire such other employees necessary to carry out the provisions of the chapter. The manual chunk also mentions the preparation of the budget, which is another responsibility assigned to the Administrator under the guidelines. Overall, the manual chunk provides sufficient information on the roles and responsibilities of staff members in the disability benefits process, making it compliant with the relevant guidelines aspect.

**\*\*Explanation & Reasoning:\*\*** The Operations Manual Chunk discusses the various roles and responsibilities of staff members involved in the disability benefits process. It outlines their duties and the procedures they must follow when dealing with disability claims. This information is consistent with the relevant guidelines, which state that the Social Security Administrator may appoint a secretary to the Board and hire such other employees necessary to carry out the provisions of the chapter. The manual chunk also mentions the preparation of the budget, which is another responsibility assigned to the Administrator under the guidelines. Overall, the manual chunk provides sufficient information on the roles and responsibilities of staff members in the disability benefits process, making it compliant with the relevant guidelines aspect.

**\*\*Verbatim Citations:\*\***

\* Manual: "The Operations Manual Chunk for Evaluation (from sections 310–317.docx)" (from Section 312. Application Approval)

\* Guidelines: "41 PNCA § 727 SOCIAL SECURITY Administration, appoint a secretary to the Board and hire such other employees necessary to carry out the provisions of this chapter." (from Guideline Excerpt 1)

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to financial reporting and budget. The manual chunk discusses various aspects of disability benefits, including application procedures, medical examinations, and duration of benefits. However, it does not provide sufficient information or discussion on financial reporting and budgeting for the Social Security System in Palau.

The relevant guidelines require the preparation and submission of detailed budget estimates for the proper conduct of the Social Security System for the next fiscal year, including audited accounts of the Retirement Fund for the last fiscal year, statements showing the estimates of income and expenditures for the fiscal year in progress, and a budget showing the estimated income and expenditures for the next fiscal year. The manual chunk does not mention or address these requirements.

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

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

Based on the provided Operations Manual Chunk and relevant guidelines, the compliance status for this aspect is **\*\*PARTIALLY COMPLIANT\*\***. The manual chunk provides some information regarding the National Healthcare Financing Governing Committee (the "Committee") and its powers and duties under the Act. However, it does not fully address or discuss the governance structure and oversight mechanisms related to the Committee, as required by the relevant guidelines.

Explanation & Reasoning:

The relevant guidelines specify that the Committee shall be subject to and bound by the Administrative Procedure Act (6 PNC) and shall have certain powers and duties related to the healthcare systems established by the Act. The manual chunk mentions the Committee but does not provide specific details on its governance structure or oversight mechanisms, which are essential aspects of the relevant guidelines.

Verbatim Citations:

\* Relevant Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 50): "The Committee shall be subject to and bound by the Administrative Procedure Act as provided in 6 PNC."

\* Relevant Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 50): "The Committee shall have the following powers and duties: transact any business."

\* Relevant Guideline Excerpt 3 (Source: 41 PNCA 2025.pdf, Page: 48): "The National Healthcare Financing Act 41 PNCA § 901 from civil or criminal suits including penalties, interest, court costs, and any other monies made available for furthering the purposes of this Act."

\* Relevant Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 47): "The Committee shall promulgate rules and regulations governing payments from Palau Health Insurance."

In conclusion, while the manual chunk provides some information about the National Healthcare Financing Governing Committee, it does not fully address or discuss the governance structure and oversight mechanisms related to the Committee as required by the relevant guidelines. Therefore, the compliance status for this aspect is **\*\*PARTIALLY COMPLIANT\*\***.

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

## CRITICAL INSTRUCTIONS FOR ANALYSIS AND REPORTING:

1. COMPLIANT: The Operations Manual Chunk fully and clearly meets the guideline related to enrollment and eligibility criteria.

### 2. EXPLANATION & REASONING:

- The manual chunk outlines the process for determining disability, including the frequency of reviews based on the nature and severity of the claimant's medical condition.
- It also specifies the requirements for applying for disability benefits, such as providing necessary documents and submitting applications within a specific timeframe.
- Additionally, the manual chunk discusses exceptional circumstances that may waive the waiting period for application of disability benefits.
- These aspects align with the relevant guidelines related to enrollment and eligibility criteria for disability benefits, which cover similar topics such as determining eligibility, applying for benefits, and exceptions to waiting periods.

### 3. VERBATIM CITATIONS (CRUCIAL):

- Manual: "Continuing disability reviews are to be undertaken to determine if disability continues. The frequency of reviews depends on the nature and severity of the claimant's medical condition and whether it is likely to improve." (from Section 310)
- Guideline: "The Board may issue rules and regulations which prescribe criteria for determining whether a person is a bona fide student." (from RPPL 3-64 § 34)

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

Based on the provided Operations Manual Chunk and Relevant Guidelines, I have evaluated the aspect of "Data management, security, and information sharing mechanisms and policies." The manual chunk is not fully compliant with the guidelines.

### Explanation & Reasoning:

The Operations Manual Chunk provides some details on how medical records are handled during the application process for disability benefits. However, it does not adequately address data management, security, and information sharing mechanisms and policies. Specifically, there is no mention of how sensitive personal and medical information is collected, stored, shared, or protected from unauthorized access or disclosure.

### Verbatim Citations:

- Manual: "The Administrator may require any person or child claiming disability benefits to undergo an examination by a physician or physicians designated by the Administration." (Source 41 PNC § 711, § 712(d), § 724, & SSA By-Laws)
- Guideline: "Notwithstanding any other provision of this chapter upon the request of the Chief of 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." (Source 41 PNCA 2025.pdf, Page: 46)

The manual chunk does not provide specific details on how wage record information is collected, stored, shared, or protected from unauthorized access or disclosure, which is a requirement under Guideline Excerpt 2. Therefore, the manual chunk is only partially compliant with the relevant guidelines.

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

The Operations Manual Chunk for evaluation (from sections 310–317.docx) is **\*\*NOT ADDRESSED\*\*** with respect to the aspect of "Appeals and Dispute Resolution Mechanisms". The manual does not contain sufficient information or discussion relevant to this specific guideline aspect, nor is it entirely absent from its content.

**Explanation & Reasoning:**

The Operations Manual Chunk provides detailed information on various aspects of disability insurance benefits, including the review process for determining continued disability, application requirements, and duration of benefits. However, it does not specifically address the appeals and dispute resolution mechanisms that should be in place to ensure fairness and accuracy in decisions related to these benefits. The relevant guidelines provide clear instructions on how such mechanisms must be established and operated, including the requirement for prompt processing of applications and appeals, the need for additional documentary evidence to support a reversal of decisions, and the right to a hearing before a board or court for those aggrieved by a decision.

**Verbatim Citations:**

\* None are applicable as the manual chunk does not comply with the relevant guidelines regarding appeals and dispute resolution mechanisms.

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

**\*\*Compliance Status:\*\*** The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the aspect of "Beneficiary Rights and Responsibilities".

**\*\*Explanation & Reasoning:\*\*** The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect. It only discusses the review process for disability claims, application procedures, and duration of benefits. There is no mention of designated beneficiaries or individuals for whom the National Government makes contributions, which are key aspects of beneficiary rights and responsibilities under the relevant guidelines.

**\*\*Verbatim Citations:\*\***

1. Manual: None

2. Guidelines:

- RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 57)
- RPPL 8-14 § 2, modified (Source: 41 PNCA 2025.pdf, Page: 50)
- RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 47)
- RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 35)
- RPPL 8-14 § 2 (Source: 41 PNCA 2025.pdf, Page: 20)

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

The Operations Manual Chunk provided does not explicitly address the relevant guidelines related to investment policies, portfolio management, and performance reporting. Therefore, it cannot be determined whether this aspect is compliant or non-compliant with the guidelines. The manual chunk primarily focuses on disability benefits claims and procedures, which are separate from investment management and performance reporting aspects.

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

The Operations Manual Chunk provided is partially compliant with the relevant guidelines related to "Incomes and contributions or payments." The manual chunk discusses various aspects of disability benefits, including application requirements, examination procedures, and duration of benefits. However, it does not specifically address the payment of contributions or the reporting of incomes and contributions.

The relevant guidelines provide detailed information on the reports and payments of contributions, as well as the designation of beneficiaries and payments to exiting foreign employees. These guidelines are not directly addressed in the manual chunk, which only mentions the requirement for employers and self-employed individuals to submit quarterly reports and pay all amounts of contributions due at the end of each quarter.

Therefore, while the manual chunk partially addresses the aspect of "Incomes and contributions or payments," it is not fully compliant with the relevant guidelines. The manual chunk should be revised to include more specific information on the payment of contributions and the reporting of incomes and contributions, in accordance with the guidelines provided.

**Explanation & Reasoning:**

The Operations Manual Chunk provides important information on disability benefits, including application requirements, examination procedures, and duration of benefits. However, it does not specifically address the payment of contributions or the reporting of incomes and contributions, which are crucial aspects of the relevant guidelines. The manual chunk only mentions the requirement for employers and self-employed individuals to submit quarterly reports and pay all amounts of contributions due at the end of each quarter.

**Verbatim Citations:**

Manual: "Disability Insurance" (from Section 310), Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 56), Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 56), Guideline Excerpt 3 (Source: 41 PNCA 2025.pdf, Page: 54), Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 54), Guideline Excerpt 5 (Source: 41 PNCA 2025.pdf, Page: 27), Guideline Excerpt 6 (Source: 41 PNCA 2025.pdf, Page: 24), Guideline Excerpt 7 (Source: 41 PNCA 2025.pdf, Page: 55)

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to claims. Specifically, Section 310 outlines the process for determining whether a person is still disabled and eligible for benefits, but it does not address the requirement for periodic medical evaluations or testing as specified in Guideline Excerpt 1. Additionally, Section 312 states that any complete application for disability benefits must be approved or disapproved within 60 days of submission, which contradicts the provision in Guideline Excerpt 4 that evidence of entitlement may be required at any time and failure to produce such evidence can result in suspension of payment.

Therefore, the Operations Manual Chunk is only partially compliant with the relevant guidelines related to claims.

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

The Operations Manual Chunk provided is **\*\*NOT COMPLIANT\*\*** with the relevant guidelines related to aspects

of health insurance, including benefits, exclusions, reimbursements, and subscriptions. The manual chunk does not clearly address or comply with several key aspects of these guidelines, such as:

1. Definition of subscription: The manual chunk does not provide a clear definition of "subscription," which is a crucial term in the relevant guidelines.
2. Reduction in subscription cost for preventive care programs: The manual chunk does not mention any provisions allowing for a reduction in the subscription cost for individuals participating in preventive care programs, as required by the guidelines.
3. Eligibility for benefits: The manual chunk does not specify the conditions under which an individual loses eligibility to receive benefits, as outlined in the guidelines.
4. Types of benefits: The manual chunk does not provide a comprehensive list of the types of benefits provided by Palau Health Insurance, as detailed in the guidelines.
5. Old age insurance benefit formula: The manual chunk does not discuss the basic benefit formula for old age insurance, as described in the guidelines.
6. Disability Insurance benefit formula: The manual chunk does not provide the basic benefit formula for disability insurance, including the minimum monthly benefit and the Supplemental Benefit Payment, as specified in the guidelines.
7. Survivor's insurance benefits: The manual chunk does not discuss the maximum and minimum amounts of survivor's insurance benefit, as outlined in the guidelines.
8. Exclusions: The manual chunk does not address the exclusions provided by Palau Health Insurance, such as costs related to hemodialysis, copayment amounts, personnel costs at the Ministry of Health and Human Services, and other excluded benefits, as detailed in the guidelines.

Therefore, the Operations Manual Chunk is **\*\*NOT COMPLIANT\*\*** with the relevant guidelines related to aspects of health insurance, including benefits, exclusions, reimbursements, and subscriptions.

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

The Operations Manual Chunk provided does not fully and clearly meet the relevant guidelines related to privacy. Specifically, Section 310 discusses the review of disability and examination, which includes the requirement for medical examinations if deemed necessary by the Administrator. However, there is no mention or discussion of how the privacy and confidentiality of the claimant's medical information will be protected during these examinations.

Therefore, the compliance status for this aspect is **\*\*PARTIALLY COMPLIANT\*\***. While the manual chunk attempts to address the relevant guidelines by discussing the necessity of medical examinations, it does not provide sufficient detail or discussion on how the privacy and confidentiality of the claimant's information will be protected during these examinations.

**Explanation & Reasoning:**

The relevant guidelines related to privacy require 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 (Guideline Excerpt 1). Furthermore, the guidelines state that the Administration shall maintain bank accounts as deemed necessary for the purposes of administering the Fund and shall only open accounts in banks that are FDIC insured (Guideline Excerpt 2).



However, the Operations Manual Chunk does not provide any information or discussion on how the privacy and confidentiality of the claimant's medical information will be protected during medical examinations. Therefore, it is unclear whether the manual chunk fully complies with the relevant guidelines related to privacy.

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Employee offenses and penalties including fraud, failure to report or pay, false claims." The manual chunk fails to address the specific aspects of fraud, failure to report or pay, and false claims in a comprehensive manner. It only mentions that an individual who knowingly submits a false claim for benefits or obtains money from the Fund under false pretenses shall be reported to the Office of the Attorney Generals for prosecution.

The manual chunk also does not provide any information on the consequences of violating these guidelines, such as penalties or fines. Additionally, there is no mention of the process for reporting and investigating suspected fraudulent activities.

Therefore, the Operations Manual Chunk is not compliant with the relevant guidelines related to "Employee offenses and penalties including fraud, failure to report or pay, false claims."

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

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

Explanation & Reasoning:

The Operations Manual Chunk primarily focuses on the review of disability and examination processes, application procedures, and duration of benefits. While there are some references to enforcement powers and sanctions in the context of offenses (e.g., Guideline Excerpt 1), these do not directly address the aspect of "Enforcement Powers and Sanctions for Non-Compliance (beyond just offenses)". The manual does discuss penalties for failing to report or pay contributions, but these are specifically related to violations of the Revenue and Tax Act rather than non-compliance with disability benefits regulations.

Therefore, based on the provided information, the Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the aspect of "Enforcement Powers and Sanctions for Non-Compliance (beyond just offenses)".

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

The Operations Manual Chunk for evaluation (from sections 310–317.docx) does not explicitly address the aspect of "Succession and transfer of medical savings account after death." Therefore, it is **\*\*NOT ADDRESSED\*\***.

Explanation & Reasoning:

The manual chunk discusses various aspects related to disability benefits, including application procedures, waiting periods, examination requirements, and exceptional circumstances. However, none of these sections directly address the succession and transfer of medical savings accounts after death. The relevant guidelines excerpts provided also do not specifically mention this aspect. Thus, the manual chunk is not compliant with the given guideline aspect.

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

Based on the provided 'Operations Manual Chunk' and 'Relevant Guidelines', I would classify this aspect as **\*\*PARTIALLY COMPLIANT\*\***. The manual chunk provides some information regarding the keeping of accounts and reports, specifically related to disability benefits claims. However, it does not fully address all aspects of the guideline, particularly with regards to the use of generally accepted accounting principles and the requirement for annual audits.

**Explanation & Reasoning:**

The 'Operations Manual Chunk' outlines the process for determining whether a person is eligible for disability benefits, including the requirements for medical examinations and documentation. It also discusses the role of the Administrator in reviewing and approving or disapproving applications. However, it does not specifically address the guideline requirement for accounts and reports to be maintained in accordance with generally accepted accounting principles or the need for annual audits.

**Verbatim Citations:**

- Manual: "The Administration may require any person or child claiming disability benefits to undergo an examination by a physician or physicians designated by the Administration. When the Administrator so requires, the cost of such examination shall be paid by the claimant." (Source 41 PNC § 711)
- Guideline: "The accounts and records shall relate to all funds and transactions for the two systems created by this Act. The Board shall appoint an independent auditor on such terms and conditions as are agreed on between the Administration and the auditor. The auditor shall audit the accounts of the fund within ninety (90) days after the end of each fiscal year. The Administration shall, as soon as practicable, submit the accounts and the auditor's report to the Olbiil Era Kelulau, and to the President of the Republic of Palau for review." (Source 41 PNCA 2025.pdf, Page: 63)