

# ***Compliance Analysis for: sections 701-706.docx***

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

**\*\*Compliance Status:\*\*** The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\***. It does not contain sufficient information or discussion relevant to this specific guideline aspect. The manual lacks any mention of the Palau Social Security Board, its functions, members, and procedures.

**\*\*Explanation & Reasoning:\*\*** The 'Operations Manual Chunk' primarily focuses on delinquency, debt collection, penalties, and interest-related matters. While it includes relevant provisions regarding the payment of Quarterly Reports, there is no mention of the Palau Social Security Board or its role in overseeing these processes. The manual does not provide any details about the board's functions, members, or procedures, which are essential aspects of the 'Functions, members, and procedures of the Social Security Board' guideline.

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

- None applicable as the manual chunk does not contain any direct citations from the relevant guidelines.

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

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

2. The Operations Manual Chunk provides details on various aspects of the quarterly reporting process, including due dates, authorized late payments, supplemental reports, collection process, delinquency, and interest assessment. However, there is no mention or discussion about actuarial soundness and sustainability in these sections.

3. Verbatim citations:

- Manual: None

- Guidelines: None

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

**\*\*COMPLIANT\*\***

The Operations Manual Chunk provided fully and clearly meets the relevant guidelines related to Fund Reserves and Solvency Requirements. It outlines the process for collecting delinquent payments, including the issuance of written first and second notice demands, as well as the final notice if payment is not made within a certain timeframe. The manual also specifies that interest shall be assessed in accordance with 41 PNC § 772 and shall not be waived by the Board unless exceptional circumstances exist. Furthermore, the manual includes provisions for supplemental reports and waivers or extensions of time-frame requirements, which are consistent with the guidelines. Overall, the Operations Manual Chunk provides a comprehensive framework for managing fund reserves and ensuring solvency requirements are met.

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

The Operations Manual Chunk fully addresses the relevant guidelines related to Fund Reserves and Solvency

Requirements by outlining the collection process, interest assessment, and provisions for supplemental reports and waivers or extensions of time-frame requirements. These aspects are critical in ensuring that the fund maintains sufficient reserves and remains solvent. The manual's compliance with these guidelines is evident through its clear and concise language, as well as its consistency with the relevant laws and regulations.

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

- Manual: "Upon a determination that an employer has not timely paid any sums due under 41 PNC the Administrator shall: Issue a written first notice demand letter to the employer or person concerned requesting payment in full or by payment agreement of the sum due as well as any applicable penalties or interest within twenty one (21) days of the date of the letter." (Source 41 PNC § 711)

- Manual: "Interest shall be assessed in accordance with 41 PNC § 772 and shall not be waived by the Board unless the Board finds that there are exceptional circumstances or unless debt is to be 'written off' for accounting purposes." (Source 41 PNC § 772)

- Manual: "Upon passage of the fourteen (14) day period without payment or agreement as to the means of payment, the Administration shall issue a written final notice which states that the matter has been referred to the Administration's Legal Counsel or the Office of the Attorney General for legal action. The Administrator shall inform the Board of all such referrals." (Source 41 PNC § 712(d))

- 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." (Source 41 PNC & SSA By-Laws)

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Audit Requirements and External Oversight." Specifically, the manual chunk lacks information on the appointment of an independent auditor or the process for conducting audits. This is in direct violation of Guideline Excerpt 1, which states that the Board shall appoint an independent auditor to audit the accounts of the Social Security System within 90 days after the end of the fiscal year.

Therefore, the status determination for this aspect is **\*\*NON-COMPLIANT\*\***.

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

The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the relevant guidelines aspect related to "Duties, functions, appointment of the Social Security Administrator." The manual chunk does not contain sufficient information or discussion relevant to this specific guideline aspect. It only discusses the quarterly report due dates and late payment policies, which are not directly related to the duties, functions, appointment, or delegation of the Social Security Administrator.

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

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

The Operations Manual Chunk provided in the evaluation does not explicitly address the aspect of "secretaries,

managers, and other staff." Therefore, it cannot be determined whether this aspect is compliant or non-compliant with the relevant guidelines.

However, based on the information provided in the manual chunk and the relevant guidelines, it can be concluded that the manual chunk does not fully address the responsibilities of secretaries, managers, and other staff related to delinquency, debt collection, penalties, and interest. The manual chunk primarily focuses on the due dates for quarterly reports and authorized late payments, with only a brief mention of supplemental reports and collection processes.

In contrast, the relevant guidelines provide detailed information about the roles and responsibilities of secretaries, managers, and other staff in maintaining employment records, preparing budgets, and administering the Medical Savings Fund and Palau Health Insurance. These guidelines also outline the powers and duties delegated to the Administrator and the limitations on such delegations.

Therefore, based on the available information, it can be concluded that the Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the aspect of "secretaries, managers, and other staff."

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

The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the relevant guidelines related to financial reporting and budget. The manual does not contain sufficient information or discussion on this specific guideline aspect, nor is it entirely absent from its content. Specifically, the manual lacks any mention of the requirement for an annual budget showing estimated income and expenditures for the next fiscal year, as stipulated in Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 52).

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")\*\***

The Operations Manual Chunk provided does not explicitly address the aspect of "Governance Structure and Oversight Mechanisms (including the National Healthcare Financing Governing Committee or the "Committee")". Therefore, it is 'NOT ADDRESSED'.

**Explanation & Reasoning:**

The Operations Manual Chunk primarily focuses on delinquency, late payment, supplemental reports, collection process, and interest assessment. While these topics are important aspects of healthcare financing governance, they do not directly address the structure and oversight mechanisms established by the National Healthcare Financing Act (41 PNCA) or the role of the Committee in overseeing the administration of healthcare systems.

**Verbatim Citations:**

Manual: None

Guideline:

- Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 50): "The powers and duties of the Committee under this Act are to provide, maintain, operate and report on the financially sound healthcare systems established by this Act and to provide an orderly means to finance and deliver comprehensive healthcare coverage to the people of the Republic."

- Guideline Excerpt 2 (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."

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

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

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to data management, security, and information sharing mechanisms and policies. Specifically, the manual chunk lacks provisions regarding the protection of sensitive personal and medical information, as well as clear policies on data sharing and access control.

**Explanation & Reasoning:**

The Operations Manual Chunk primarily focuses on delinquency, debt collection, penalties, and interest. While it includes some sections related to data management (e.g., Section 703 on supplemental reports), these sections do not adequately address the aspects of data security and information sharing mechanisms and policies. The relevant guidelines emphasize the importance of protecting personal and medical information, ensuring secure data storage and transmission, and establishing clear policies on data access and sharing.

The manual chunk does not provide specific details on how the Administration handles or protects sensitive personal and medical information, such as employee records or contributions. It also lacks clear policies on data access and sharing, including guidelines for who has access to this information and under what circumstances it can be shared. This raises concerns about potential breaches of privacy and security.

**Verbatim Citations:**

\* Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 46): "shall not release the information under any circumstances."

\* Guideline Explanation & Reasoning: This excerpt highlights the importance of protecting sensitive personal and medical information, which is not adequately addressed in the Operations Manual Chunk.

\* Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 12): "The Public Auditor shall issue annual reports on the fiscal soundness of the Social Security System, and such reports shall be provided to the Board, the President of the Republic, and the presiding officers of the Olbiil Era Kelulau."

\* Guideline Explanation & Reasoning: This excerpt emphasizes the need for clear policies on data access and sharing, as well as regular reporting and auditing to ensure compliance with relevant laws and regulations. The Operations Manual Chunk does not provide such policies or mechanisms.

\* Guideline Excerpt 3 (Source: 41 PNCA 2025.pdf, Page: 53): "The Ministry of Health and Human Services, Ministry of Finance and the Administration shall enter into a Memorandum of Understanding covering the following:"

\* Guideline Explanation & Reasoning: This excerpt highlights the importance of establishing clear agreements and understanding between different entities involved in data management, security, and information sharing. The Operations Manual Chunk does not provide such agreements or understandings.

\* Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 16): "The Social Security System, and has such other powers, functions, duties and responsibilities as are prescribed by this chapter or the Social Security By-Laws."

- \* Guideline Explanation & Reasoning: This excerpt emphasizes the need for clear roles and responsibilities in data management, security, and information sharing. The Operations Manual Chunk does not provide such clarity.
- \* Guideline Excerpt 5 (Source: 41 PNCA 2025.pdf, Page: 16): "A delegation may be made subject to such limitations and conditions, as the Administrator deems proper and necessary."
- \* Guideline Explanation & Reasoning: This excerpt highlights the importance of establishing clear limitations and conditions for data access and sharing. The Operations Manual Chunk does not provide such limitations or conditions.
- \* Guideline Excerpt 6 (Source: 41 PNCA 2025.pdf, Page: 64): "No medical information obtained by the Administration regarding any individual may be released to any person, except as follows:"
- \* Guideline Explanation & Reasoning: This excerpt emphasizes the need for strict data protection and confidentiality measures in handling sensitive personal and medical information. The Operations Manual Chunk does not provide such measures.
- \* Guideline Excerpt 7 (Source: 41 PNCA 2025.pdf, Page: 46): "PALAU SOCIAL SECURITY SYSTEM 41 PNCA § 791"
- \* Guideline Explanation & Reasoning: This excerpt highlights the importance of clear policies and procedures for data management, security, and information sharing. The Operations Manual Chunk does not provide such policies or procedures.

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to "Appeals and Dispute Resolution Mechanisms." Specifically, the manual chunk lacks information on the process for filing an appeal or requesting a hearing before the Board of Directors. This is in contrast to the guidelines which state that any person aggrieved by a decision of the Administration involving any right, benefit, or obligation under this chapter may file a request for reconsideration within 30 days of receipt of the Administration's decision and, along with that request, may provide any reasons or additional documentary evidence which would support a reversal of the original decision.

Therefore, the compliance status is **\*\*PARTIALLY COMPLIANT\*\***. The manual chunk attempts to address the guideline by outlining the process for filing a supplemental report and the consequences of underpayments due to simple miscalculations. However, it does not provide sufficient information on the appeals and dispute resolution mechanisms available to individuals who are aggrieved by a decision of the Administration.

**Explanation & Reasoning:**

The relevant guidelines state that any person aggrieved by a decision of the Administration involving any right, benefit, or obligation under this chapter may file a request for reconsideration within 30 days of receipt of the Administration's decision and, along with that request, may provide any reasons or additional documentary evidence which would support a reversal of the original decision. The Operations Manual Chunk does not mention this process or provide instructions on how to file an appeal or request a hearing before the Board of Directors.

Therefore, the manual chunk is only partially compliant with the relevant guidelines related to appeals and dispute resolution mechanisms. It lacks information on the specific process for filing an appeal or requesting a hearing before the Board of Directors, which is required by the guidelines.

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

**\*\*Compliance Status:\*\*** **\*\*PARTIALLY COMPLIANT.\*\***

**\*\*Explanation & Reasoning:\*\*** The Operations Manual Chunk is partially compliant with the relevant guidelines related to "Beneficiary Rights and Responsibilities." Specifically, Section 701 outlines the due dates for Quarterly Reports and payment requirements, which aligns with Guideline Excerpt 1's requirement for Medical Savings Accounts under this Act. However, Section 702 discusses authorized late payments and interest assessment, which is not explicitly addressed in the relevant guidelines. Furthermore, Section 705 mentions delinquency, but it does not directly relate to beneficiary rights or responsibilities.

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

- Manual: "Quarterly Report Due Date" (from Section 701)
  - "The due dates for the Quarterly Reports shall be as follows:"
  - "March 31st Report due on April 30th"
  - "June 30th Report due on July 31st"
  - "September 30th Report due on October 31st"
  - "December 31st Report due on January 31st"
  - "Payment shall be made by the due dates."
  - "Payment that is mailed and post marked by the due date but does not physically arrive at the Administration until after the due date shall NOT be considered a late payment."
- Guideline: "Designated Beneficiaries" (from Section 940)
  - "Designated Beneficiaries of Medical Savings Accounts under this Act shall include, at a minimum, the participating employee, his or her spouse, and his or her dependent children. Additional beneficiaries may be designated as permitted by regulation."

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

**\*\*Compliance Status:\*\*** The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with regards to the aspect of "Investment Policies, Portfolio Management, and Performance Reporting." The manual does not contain sufficient information or discussion relevant to this specific guideline aspect.

**\*\*Explanation & Reasoning:\*\*** The Operations Manual Chunk primarily focuses on delinquency, debt collection, penalties, and interest. While it mentions the requirement for employers to file Quarterly Reports, there is no discussion about investment policies, portfolio management, or performance reporting. The relevant guidelines also do not address these aspects specifically. Therefore, the manual chunk does not comply with the given guideline aspect.

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

- Manual: 'Quarterly Reports' (from Section 701)
- Guideline: 'Investment Policies, Portfolio Management, and Performance Reporting' (not applicable as the manual chunk does not address these aspects)

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

The Operations Manual Chunk provided is COMPLIANT with the relevant guidelines related to "Incomes and

contributions or payments." The manual chunk clearly outlines the due dates for Quarterly Reports, payment requirements, and the process for authorized late payments. It also specifies that there will be no penalty assessed for underpayments due to simple miscalculations on the employer's part. Additionally, the manual chunk details the collection process, including written first notice demand letters, second notice demand letters, and final notices. The manual chunk is fully and clearly compliant with the guidelines provided.

**Explanation & Reasoning:**

The Operations Manual Chunk provides a clear understanding of the payment requirements for Quarterly Reports and the process for authorized late payments. It also specifies that there will be no penalty assessed for underpayments due to simple miscalculations on the employer's part, which is consistent with the relevant guidelines. Furthermore, the manual chunk outlines the collection process, including written first notice demand letters, second notice demand letters, and final notices, which aligns with the guidelines provided. Overall, the Operations Manual Chunk is fully compliant with the relevant guidelines related to "Incomes and contributions or payments."

**Verbatim Citations:**

Manual: 'Quarterly Reports Due Date' (from Section 701), Guideline: 'Reports and payments of contributions' (from Section 925(a))

Manual: 'Payment Requirements' (from Section 702), Guideline: 'Payments' (from Section 940)

Manual: 'Collection Process' (from Sections 703-706), Guideline: 'Designated Beneficiaries' (from Section 941)

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

The Operations Manual Chunk provided does not fully and clearly meet the relevant guidelines related to claims. Specifically, Section 705 of the manual chunk states that 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. However, this statement contradicts Guideline Excerpt 1, which specifies that the Administration shall promulgate rules and regulations for settling claims directly with medical providers.

Therefore, the manual chunk is **\*\*PARTIALLY COMPLIANT\*\*** as it attempts to address the guideline related to claims but does so incompletely, vaguely, or with minor deficiencies that prevent full adherence. The manual chunk lacks specific information or discussion relevant to this specific guideline aspect, which is entirely absent from the manual's content.

**Explanation & Reasoning:**

The Operations Manual Chunk provides details on the consequences of not timely paying Quarterly Reports, including the assessment of interest and potential legal action. However, it does not directly address claims-related matters, such as settling claims with medical providers or handling delinquencies related to claims. The relevant guidelines explicitly mention these aspects, emphasizing the need for specific rules and regulations governing claims settlements and delinquency procedures.

**Verbatim Citations:**

\* 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." (from Section 705)

\* Guideline Excerpt 1: "The Administration shall promulgate rules and regulations, in accordance with 6 PNC chapter 1, for settling claims directly with the medical provider." (from RPPL 8-14 § 2, Subchapter VI, Claims, § 946)

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

**\*\*Compliance Status:\*\*** The Operations Manual Chunk is **\*\*NOT ADDRESSED\*\*** with respect to the relevant guidelines related to aspects of health insurance, including benefits, exclusions, reimbursements, and subscriptions.

**\*\*Explanation & Reasoning:\*\*** The manual chunk does not contain any information or discussion regarding the specific aspects of health insurance mentioned in the guidelines. It primarily focuses on delinquency, late payments, and collection processes, which are not directly related to health insurance benefits, exclusions, reimbursements, or subscriptions.

**\*\*Verbatim Citations:\*\*** None applicable as no direct citation from the manual can be found to support a compliance claim for 'COMPLIANT' or 'NOT ADDRESSED'.

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

The Operations Manual Chunk provided does not fully comply with the relevant guidelines related to privacy. The manual chunk discusses various aspects of delinquency, late payments, and interest assessment, but it does not provide any specific information or discussion on how the Administration handles and protects the privacy of individuals' medical information.

The relevant guidelines clearly state 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; for the purposes of the function and operations under this Act (Guideline Excerpt 1). However, the manual chunk does not mention or address these privacy requirements.

Therefore, the Operations Manual Chunk is **\*\*NOT COMPLIANT\*\*** 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, and false claims. Specifically, the manual chunk fails to address the consequences of late payments, which is a key aspect of this guideline.

**Explanation & Reasoning:**

The Operations Manual Chunk outlines the process for collecting delinquent payments but does not explicitly discuss penalties or interest that may be applied for late payments. The relevant guidelines state that an employer who fails to timely pay any sums due under 41 PNC shall be subject to penalties and/or interest in accordance with 41 PNC § 772. However, the manual chunk does not mention these penalties or provide details on how they are calculated or applied.

**Verbatim Citations:**

Manual: "Upon passage of the fourteen (14) day period without payment or agreement as to the means of



payment, the Administration shall issue a written final notice which states that the matter has been referred to the Administration's Legal Counsel or the Office of the Attorney General. The Administrator shall inform the Board of all such referrals."

Guideline: "An employer who fails to timely pay any sums due under 41 PNC shall be subject to penalties and/or interest in accordance with 41 PNC § 772."

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

The Operations Manual Chunk provided is **\*\*NOT COMPLIANT\*\*** with the relevant guidelines related to enforcement powers and sanctions for non-compliance. The manual chunk fails to address several aspects of the guidelines, including the use of medical information, penalties for knowingly submitting false claims or obtaining money, and the imposition of fines for failing to report or pay contributions due to the Fund.

#### Explanation & Reasoning:

The relevant guidelines provide specific enforcement powers and sanctions for non-compliance beyond just offenses. These include penalties for knowingly submitting false claims or obtaining money, as well as fines for failing to report or pay contributions due to the Fund. The Operations Manual Chunk does not address these aspects of the guidelines, which are essential for ensuring compliance with the relevant laws and regulations.

#### Verbatim Citations:

\* Guideline Excerpt 1 (Source: 41 PNCA 2025.pdf, Page: 64): "It shall be an offense for any individual or entity to knowingly submit a false claim for benefits or obtain money from the Fund under false pretenses for the purpose of misleading, defrauding, or cheating the Fund."

\* Guideline Excerpt 2 (Source: 41 PNCA 2025.pdf, Page: 64): "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 3 (Source: 41 PNCA 2025.pdf, Page: 65): "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 ten thousand dollars (\$10,000), or both."

\* Guideline Excerpt 4 (Source: 41 PNCA 2025.pdf, Page: 46): "An employer who knowingly fails to 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 (Source: 41 PNCA 2025.pdf, Page: 41): "If any contribution or penalty imposed by this chapter 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."

\* Guideline Excerpt 6 (Source: 41 PNCA 2025.pdf, Page: 41): "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 7 (Source: 41 PNCA 2025.pdf, Page: 40): "An individual 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."

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

The Operations Manual Chunk provided does not explicitly address the aspect of "Succession and transfer of medical savings account after death." Therefore, it is 'NOT ADDRESSED.'

Explanation & Reasoning:

1. The manual chunk focuses on various aspects related to delinquency, late payments, supplemental reports, collection process, delinquency, and interest assessment. However, none of these sections directly discuss succession and transfer of medical savings accounts after death.
2. The relevant guidelines excerpts provided also do not specifically address this aspect. They primarily deal with the use of Medical Savings Accounts for healthcare costs, beneficiaries, severability, income, organization of the Fund, and designation of beneficiaries.
3. Given the absence of any relevant information or discussion in the manual chunk and guidelines, it is not possible to determine whether the aspect is compliant or non-compliant. Thus, the status determination is 'NOT ADDRESSED.'

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

Based on the provided Operations Manual Chunk and Relevant Guidelines, the compliance status for this aspect is **\*\*NOT ADDRESSED\*\***. The manual chunk does not contain sufficient information or discussion relevant to the specific guideline aspect of "The keeping of accounts and reports". Specifically, there is no mention of how the Administration maintains records of employees and contributors, nor any reference to the preparation and submission of budget estimates.

Therefore, it cannot be determined whether the manual chunk fully and clearly meets the relevant guidelines or presents a significant deviation from them.