

HHSAC

HHSAC Control Gates & Evidence Model

Tier-1 - Public Tier-1 Document

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Verification-Only Public Surface: This document is intentionally sanitized. It provides governance and verification information sufficient for initial compliance review without exposing sensitive operational details.

Evidence-First Definition: Any reference to 'delivered' means only POD-indexed delivery recorded in the evidence register at a controlled point. HHSAC does not claim patient-level delivery or end-user receipt.

Compliance-by-Design: HHSAC does not facilitate evasion of laws, sanctions, or controls. Ambiguity triggers EX/HOLD until resolved through documented escalation.

Purpose

This document defines how HHSAC verifies claims through control gates and an evidence model anchored in POD-indexed delivery at controlled points. It is written for Prime/Bank/Regulators and other authorized reviewers to understand the verification logic without exposing sensitive operational details.

Key Definitions

- **Claim:** any statement requiring verification (e.g., release executed, delivery recorded, funds flow closed).
- **POD-Indexed Delivery:** documented handover at a controlled point, recorded with a unique index in the evidence register.
- **Controlled Point:** an authorized handover location or reference point where evidence capture is governed (details Tier-2).
- **EX/HOLD:** exception/hold status used when evidence is incomplete or ambiguity exists.
- **Two-Key:** dual sign-off required by segregated authorities for any material approval/release action.

Evidence-First Model (Tier-1 View)

Every claim must be traceable to evidence. Evidence is organized as an indexable pack referenced by a unique ID and checksum under controlled records.

- Evidence Register Entry: unique index, date/time, Doc IDs referenced, status (Open/Closed/HOLD), and checkpoint notes.
- POD Artifact: documented proof of handover (e.g., signed POD, digital acknowledgment, or equivalent).
- Quantity Reconciliation: documented count / batch verification, discrepancies logged if any.
- Authorization Trace: references to Two-Key approvals and any escalation decisions.

Tier-1 does not publish operational evidence artifacts; it publishes the verification rules and the existence of an evidence register with controlled access.

Control Gate Sequence

- **Gate 1 - Evidence Validation:** confirm evidence completeness and internal consistency for the claim.
- **Gate 2 - Two-Key Authorization:** obtain dual sign-off for release/approval actions; no unilateral authorization.
- **Gate 3 - Escalation Protocol:** route boundary cases, exceptions, or compliance flags to RCC; default EX/HOLD.
- **Gate 4 - Disclosure Boundary Check:** ensure Tier classification; apply minimization/redaction before any disclosure.

EX/HOLD Triggers and Resolution

- Missing or partial POD; unreadable/unauthenticated artifact; inconsistent identifiers.
- Quantity mismatch between manifest/invoice/evidence count; unexplained variance.
- Authorization ambiguity (missing sign-off, role conflict, or unclear authority).
- Disclosure uncertainty (Tier boundary unclear or request purpose not valid).

Resolution requires documented root cause analysis, corrective action, and recorded approval to clear HOLD. HOLD is cleared only when the evidence set satisfies the Gate 1 criteria and applicable escalations are closed.

Minimum Evidence Data Fields (Public Summary)

To maintain minimization, Tier-1 publishes only the categories of evidence fields, not operational values.

- Unique evidence index ID and associated claim ID.
- Dates (event date and record date); versions of governing Doc IDs used.
- Status: Open / Closed / HOLD; and reason codes for HOLD.
- Checksum(s) for evidence pack artifacts (Tier-2).

Verification Requests and Anomaly Reporting

- Document authenticity verification: compare the SHA-256 checksum of your copy against the Document Registry entry.
- Evidence verification (Tier-2): submit a formal Tier-2 request and NDA; provide the claim/evidence index reference.
- Anomalies: report any mismatch, suspicious request, or integrity concern to Compliance & Risk.

Evidence inquiries: evidence@hhsac.org - Compliance escalation: compliance@hhsac.org.

Assurance Limits

- HHSAC verification is bounded to controlled handover points and governed evidence capture. Downstream distribution beyond authorized handover is outside the Tier-1 verification surface.
- Tier-1 documentation is a governance and verification framing; it is not an operational guarantee.