



Merative™ Social Program Management

Temporary exclusion from processing

Clients are responsible for ensuring their own compliance with various laws and regulations, including the European Union General Data Protection Regulation. Clients are solely responsible for obtaining advice of competent legal counsel as to the identification and interpretation of any relevant laws and regulations that may affect the clients' business and any actions the clients may need to take to comply with such laws and regulations. The products, services, and other capabilities described herein are not suitable for all client situations and may have restricted availability. Merative does not provide legal, accounting or auditing advice or represent or warrant that its services or products will ensure that clients are in compliance with any law or regulation.

This document is intended to provide guidance to help you in your preparations for GDPR readiness. It provides information about features of this offering, and aspects of the product's capabilities, that may help your organisation with GDPR requirements. This information is not an exhaustive list, due to the many ways that clients can choose and configure features, and the large variety of ways that the product can be used in itself and with third-party applications and systems.

The GDPR and temporary exclusion from processing

The GDPR states that a data subject has the right to the restriction of processing.

Article 18(1) outlines the conditions necessary to obtain the restriction from the controller, examples of which are, but not limited to:

- The accuracy of the personal data is contested by the data subject
- The processing is unlawful
- The controller no longer needs the personal data for the purposes of the processing

Social Program Management (SPM) and temporary exclusion from processing

There might be occasions when individuals may want to be excluded from processing. Some examples are outlined as follows. However, this is not an exhaustive list and the use cases may vary from customer to customer.

Eligibility and entitlement

A case's eligibility and entitlement are assessed using Cúram Express Rules (CER). SPM allows customers to provide custom evidence and rules to calculate an eligibility and entitlement determination. CER allows customers to develop rules which implement their own legislation driven requirements.

SPM can be configured to allow an individual and their evidence to be excluded when determining eligibility and entitlement by designing and modelling the appropriate evidence and rules.

As requirements vary from customer to customer, a dynamic evidence type that controls processing is not included in the product. If required, SPM allows each customer to design and configure their own evidence type for this purpose.

An example evidence type definition might store the following attributes:

- A case participant role
- A Boolean which specifies whether the above case participant role is to be included in processing. For example `isApplying`

The evidence definition represents a person applying for eligibility and entitlement. For example Applicant Evidence.

Custom Cúram Express Rules need to be designed to accommodate this evidence.

Example eligibility and entitlement rules might initially build up a list of people on a case to be processed. This list can then be filtered by the `isApplying` attribute on each person's Applicant evidence.

This could allow control over whether an individual is included in eligibility and entitlement processing.

Case management

SPM allows for the restriction of some case processing through controlling a case's status.

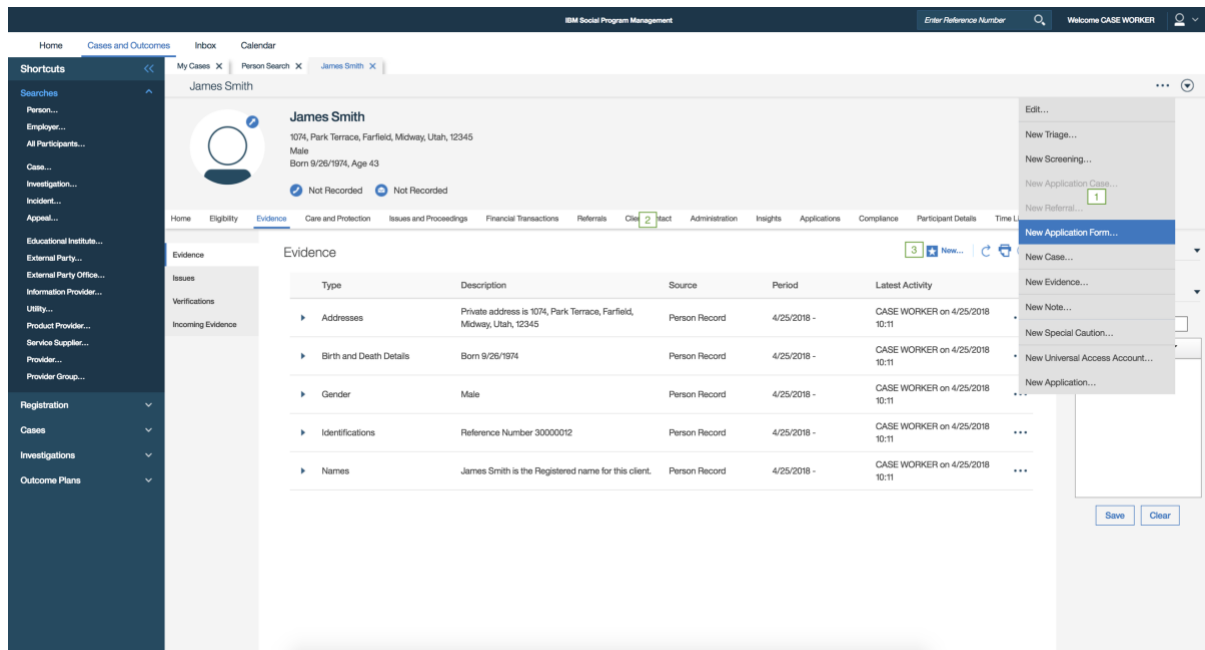
For example, the application property `curam.miscapp.payuptosuspendeddate` can be used to determine whether payments should be issued up to the date of suspension when a case is suspended. The default value of this property is YES meaning that payments will be issued up to the date of suspension. If this property is set to NO, no payments will be issued after the case is suspended.

Customisable user interface

SPM's user interface is fully customisable. Customers have the ability to hide elements of the user interface based on case status. For example, it is possible to hide the ability for caseworkers to apply evidence changes for closed or suspended cases.

SPM allows for customers to provide custom implementations to their UI state loaders, `curam.util.tab.impl.DynamicMenuStateLoader` and `curam.util.tab.impl.DynamicNavStateLoader`. These determine whether tab level action menu items or navigation tabs are displayed, labels 1 and 2 respectively in the graphic below.

In addition, all page `ACTION_CONTROL` elements, label 3 in the graphic below, can contain a child `CONDITION` element. This can be used to hide the button based on application state.



Verifications

SPM can verify the authenticity and accuracy of personal information using its Verification Engine.

The verification engine allows caseworkers to verify the accuracy of a client's personal information through a variety of means. Examples of which are:

- Documents such as birth certificates or bank statements
- Verbal means. e.g. in person or over the phone

Evidence can be prevented from being activated and therefore being included in processing if the accompanying verification requirements have not been satisfied. Similarly, cases may not be activated until all mandatory verification requirements have been met for the evidence associated with that case.

However, there can be programs where a client is given a period of time during which the program proceeds into delivery stage while the client provides the necessary verification documentation. If the client does not provide the necessary verification documentation during this period, then delivery of the program stops. From a verifications perspective, this is achieved by defining the verification as mandatory but allowing the mandatory

verification to be waived for this period of time by creating appropriate "Verification Waiver" entries. For example, expedited food stamps may allow clients to get a benefit earlier than standard food stamps and for the first month the verifications are not mandatory.

For more information on verifications please see the "Verification Engine" guide.

Further information

For more information about Eligibility and Entitlement, see the “Developing with Eligibility and Entitlement by using Cúram Express Rules” guide.

For more information about configuring dynamic evidence, see the “Configuring Dynamic Evidence” guide.

For more information about case management, see the Ongoing Case Management section in the “Integrated Case Management” guide.

For more information about the verifications, see the “Verification Engine” guide.

For more information about the user interface, see the “Web Client Reference” guide.

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