

# Global Authenticity and Operational Evidence Infrastructure: A Framework for Material Risk Verification and Corporate Compliance in Healthcare Markets

## Bounded Verification, Chain-of-Custody, and Evidence-Linked Review for Product, Prescription, Dispensation, and Claim Workflows

**(Non-Normative)**

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This submission presents an integrated operational evidence framework for verifiable provenance and material risk management within the life sciences and healthcare sectors. It details an auditable cryptographic architecture designed to mitigate supply chain liabilities and corporate fraud, while upholding U.S. market integrity, financial transparency, and investor protection standards.

**Submission to the U.S. Securities and Exchange Commission (SEC)**

**Date:** March 20, 2026



*“An operational blueprint for linking medical supply chain provenance with cryptographic auditability and corporate compliance standards.”*

# Cover Letter

**To:** The U.S. Securities and Exchange Commission (SEC)

**Date:** March 20, 2026

**Subject:** Submission of the Healthcare Operational Evidence and Compliance Framework

**Dear Sir/Madam,**

I am pleased to submit the attached framework, detailing a cross-domain operating model for the cryptographic traceability of medicines, health products, and clinical decisions, for your review.

While healthcare operations are traditionally overseen by medical and food regulatory bodies, the financial materiality of these operations falls directly under the SEC's jurisdiction. Publicly traded pharmaceutical companies, hospital networks, and medical distributors face severe market capital risks tied to supply chain fraud, delayed recall disclosures, and compliance breaches.

This submission provides the SEC and its examiners with an "auditor-ready" infrastructure designed to enforce corporate transparency and protect shareholders. The application of this framework guarantees compliance and prevents financial risks through:

- **Financial Risk Mitigation:** By establishing Immutable Log Segments (ILS) for product provenance and recalls, the framework eliminates the ability of corporate officers to obscure or delay the reporting of material liabilities (such as product safety failures) to investors.
- **M&A and Audit Transparency:** The standardized, non-destructive evidence packs ensure that during mergers, acquisitions, or routine audits, regulators and acquiring entities have mathematically verifiable proof of a target company's historical compliance and hidden liabilities.
- **Revenue Integrity:** The framework explicitly links financially consequential workflows—such as reimbursements and supply chain settlements—to cryptographically authenticated clinical and product milestones, preventing the artificial inflation of corporate revenues and accounting fraud.

As the healthcare sector becomes increasingly digital and complex, ensuring that corporate disclosures match operational reality is vital for market integrity. This framework equips regulatory authorities with the high-fidelity, bounded-access tools necessary to verify compliance without disrupting institutional workflows.

I look forward to discussing how this operational evidence layer can help the SEC uphold investor protection, fair markets, and transparent capital formation in healthcare.

Sincerely,



/s/ **Daniel Bruno Corvelo Costa**

Proponent & Lead Architect

# Table of Contents

0. Executive Summary
  1. Non-Normative Disclaimer & Scope Boundaries
  2. Problem Statement: Authenticity, Proof-of-Safety, and Review Friction in Medicines and Clinical Decisions
  3. Definitions & Neutral Taxonomy (Baseline-Aligned)
  4. Product Authenticity and Provenance Operating Model
  5. Prescription, Authorization, and Issuer Legitimacy Model
  6. Chain-of-Custody, Storage, and Controlled Dispensation Integrity
  7. Proof-of-Safety and Context-Bound Clinical Decision Evidence
  8. Review, Recall, Quarantine, Correction, and Supersession Workflows
  9. Evidence Artifacts, Manifests, Reconciliation, and Preservation
  10. Tiered Reviewer, Institutional, and Examiner Access
  11. Governance, Change Control, Recertification, and Accountability
  12. Financially Consequential Workflows (Optional / Conditional Scope)
  13. Offboarding, Legacy Compatibility, and Reversibility Without Data Loss
  14. Examiner Readiness: Standard Checks Pack + Reviewer / Examiner Query Pack
  15. Worked Examples (Paste-Ready)
- Appendix A — Product, Authorization, Custody, and Proof-of-Safety State Taxonomy Tables (Full)
- Appendix B — Evidence Set Mapping Templates for Product, Prescription, Custody, Review, and Claim States
- Appendix C — Reconciliation Break Taxonomy for Authenticity, Provenance, Custody, and Safety Workflows
- Appendix D — Standard Checks Pack (Full List)

Appendix E — Reviewer / Examiner Query Pack (Expanded; Conceptual SQL / Pseudocode / Retrieval Logic)

Appendix F — Preservation Bundle and Hold-Set Templates

Appendix G — RACI Matrices + Accountability Inserts

Appendix H — Content-Addressed Manifest, Diff, and Retrieval Templates

Appendix I — Offboarding Proof Bundle for Medicines, Health Products, and Clinical Decisions

Appendix J — Reader Navigation Map / Reviewer Jump Table

Appendix K — Minimal Glossary (Baseline-First)

Appendix L — Version Lineage, Supersession, and Revocation Templates

Appendix M — Scope-of-Use and Authority Matrix (Time / Location / Purpose / Issuer / Release Conditions)

Appendix N — Worked Mini-Scenario Pack (Cross-Domain)

Appendix O — Materiality & Escalation Matrix for Product, Authorization, Custody, and Safety Breaks

Appendix P — Optional Claim / Reimbursement Linkage Templates (Only if Section 12 Is Included)

Appendix Q — Proof-Based Minimization and Verifier Output Templates

Appendix R — Cross-Border Portability and Conflict-of-Process Mini-Scenarios

Appendix S — Confidence / Corroboration Bands for Reviewer Use

Appendix T — Performance and SLA / SLO Reference Tables

Appendix U — Adversarial Failure Patterns, Abuse Cases, and Containment Logic for Product Authenticity, Authorization, Custody, Proof-of-Safety, and Claim Workflows

Appendix V — Canonical State, Version Supersession, and Authority-to-Release / Authority-to-Dispense Controls

Appendix W — Claim, Reimbursement, Settlement, and Dispute-Resilient Payout Controls

Appendix X — Bounded Reviewer/Examiner Verification Outputs, Minimal Disclosure Profiles, and Query-Safe Evidence Views

Appendix Y — Cross-Border Portability, Conflict-of-Process Handling, and Jurisdiction-Bounded Review

Appendix Z — Performance, Service-Level Objectives, Operational Resilience, and Recovery Discipline

Appendix AA — Applied Operational Scenarios and Benefit Realization Across Medicines, Health Products, and Clinical Decisions

Appendix AB — Minimal Institution Adoption Blueprint and Phased Implementation Path for Product Authenticity, Authorization, Custody, Proof-of-Safety, and Bounded Review Workflows

Appendix AC — Control Mapping, Readiness Scoring, and Self-Assessment Pack for Product Authenticity, Authorization, Custody, Proof-of-Safety, and Bounded Review Workflows

References and Supporting Materials

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# Global Authenticity and Operational Evidence Infrastructure: A Framework for Material Risk Verification and Corporate Compliance in Healthcare Markets

## Bounded Verification, Chain-of-Custody, and Evidence-Linked Review for Product, Prescription, Dispensation, and Claim Workflows

(Non-Normative)

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Document Status: Non-Normative Implementation Guidance

Companion to: Baselines A–D (Mandatory); Baseline E (Optional, Payments & Settlement)

Scope: Cross-Domain Operating Model — Medicines, Health Products, Clinical Decisions

Audience: Manufacturers, Distributors, Pharmacies, Hospital Systems, Clinical Operators, Benefit Administrators, Auditors, Reviewers, Supervisory Readers

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*"The objective of this framework is to make product authenticity, provenance, authorization, and proof-of-safety states evidentiary, replayable, and governable. It does not determine medical truth, regulatory approval, legal liability, or clinical correctness by decree and does not replace physicians, pharmacists, regulators, laboratories, or institutional review; it provides an operational evidence layer that allows product, prescription, dispensation, and high-impact clinical-decision states to be independently reconstructed, verified, escalated, preserved, corrected, and reviewed under bounded access conditions."*

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## 0. Executive Summary

### 0.1 What Problem This Addresses

Medicines, health products, and clinical decisions increasingly traverse fragmented digital and institutional workflows — from manufacturing and packaging through multi-party distribution chains, pharmacy dispensation systems, hospital ordering platforms, clinical decision-support engines, and benefit-administration pipelines. At each handoff, critical operational states — product authenticity, provenance integrity, prescriber authority, dispensation correctness, and safety-relevant evidence — are either asserted without auditable backing, recorded in incompatible formats, or left entirely undocumented. The consequences are tangible and recurring:

**Counterfeit and Substitution Risk.** Products enter supply chains with incomplete or non-verifiable provenance. When authenticity cannot be reconstructed from evidence artifacts — manufacturer origin, batch/lot linkage, custody handoff records, storage-condition integrity — counterfeit, diverted, or substituted products may reach dispensation without detection. Current detection depends heavily on post-hoc inspections, tip-based investigations, or end-point laboratory testing, none of which scale to the volume and velocity of modern pharmaceutical distribution.

**Authorization and Prescription Fragmentation.** Prescriptions, clinical instructions, and authorization artifacts are frequently recorded in formats that cannot be independently verified for issuer legitimacy, scope validity, time-window currency, or revocation status. A prescription issued by a prescriber whose authority has lapsed, or whose scope does not extend to the dispensed product, or whose instruction has been superseded by a correction, may proceed through dispensation pipelines without triggering a reconciliation break — because no reconciliation framework exists at the operational layer.

**Chain-of-Custody Gaps.** Medicines and health products transit through multiple custodial entities: manufacturers, logistics providers, regional distributors, wholesale intermediaries, pharmacy warehouses, hospital receiving docks, unit-dose repackagers, and dispensation counters. At each transition, custody state may change without generating evidence artifacts that are content-addressed, immutable, and linked to the preceding custody record. Stale custody evidence, undocumented custody gaps, and missing handoff confirmations create contamination and substitution risk patterns that are operationally invisible until a downstream incident surfaces.

**Opaque Clinical-Decision States.** High-impact clinical decisions — dose calculations, contraindication assessments, formulary selections, treatment-protocol outputs — increasingly involve algorithmic or decision-support systems whose outputs are recorded without sufficient context for independent reviewer reconstruction. When a clinical-decision output cannot be replayed against the evidence state that existed at the time of the decision, reviewers are forced to accept the output at face value or reject it entirely. Neither approach is operationally sound.

**Review and Dispute Friction.** Disputes, recalls, corrections, and supervisory reviews require replayable evidence: the ability to reconstruct what product was involved, where it came from, who authorized its movement or use, under which scope and time window, what safety-relevant evidence existed, and whether downstream release, dispensation, reimbursement, or review actions bound to the correct current-reference state. Without standardized evidence artifacts, content-addressed manifests, break taxonomies, and tiered reviewer access, these reconstruction efforts are slow, incomplete, and inconsistently documented.

**Financially Consequential Release Without Sufficient Evidence.** Where claim, reimbursement, or payout workflows are in scope, release decisions may proceed on materially unresolved evidence states — unauthenticated products, expired authorizations, unreconciled custody records, or superseded safety evidence. Evidence-linked settlement confirmation, as established in baseline frameworks, provides the operational pattern: financially consequential actions should not proceed when evidence states are materially unresolved.

This framework addresses these operational problems by providing an examiner-ready, institution-usable operating model that treats product authenticity, provenance, authorization, custody,

dispensation, and proof-of-safety as operationally evidenced states subject to reconciliation, correction, preservation, and bounded review — rather than as opaque assertions accepted on trust.

## **0.2 Why Provenance, Prescription Legitimacy, Dispensation Integrity, and Bounded Verification Must Be Reviewed Together**

Conventional approaches address these concerns in isolation: anti-counterfeit programs focus on product verification at point of dispensation; prescription monitoring programs track controlled substances through separate databases; supply-chain serialization initiatives capture custody events without linking them to authorization or safety states; clinical decision-support systems operate within their own evidence ecosystems. Each silo produces evidence artifacts in incompatible formats, maintains separate reconciliation cadences, applies inconsistent break classification logic, and generates review outputs that cannot be cross-referenced without manual reconstruction.

The operational problem is structural. Product authenticity evidence that cannot be linked to custody chain evidence cannot prove that the authentic product at origin is the same product at dispensation. Prescription validity evidence that cannot be cross-referenced against issuer authority evidence and product provenance evidence cannot demonstrate that the authorized prescriber directed dispensation of the correct product within the correct scope. Dispensation records that cannot be linked to upstream custody evidence and downstream claim evidence cannot support reimbursement decisions with confidence.

This framework integrates these concerns into a unified evidence model — not by merging databases, creating universal identifiers, or centralizing PII, but by establishing common artifact structures, reconciliation disciplines, break taxonomies, tiered reviewer access patterns, and governance controls drawn from baseline frameworks that have been developed for analogous operational challenges in tokenized securities and institutional compliance infrastructure.

## **0.3 What This Document Is and Is Not**

### **What It Is:**

- A non-normative, examiner-ready, institution-usable operating model for product authenticity, provenance, authorization, custody, dispensation, proof-of-safety, and optional claim/reimbursement evidence in medicines, health products, and clinical decisions.
- A cross-domain application of evidence, reconciliation, provenance, bounded verification, governance, and optional payment/reimbursement evidence patterns established in baseline frameworks.
- Designed for use by manufacturers, distributors, pharmacies, hospital systems, clinical operators, benefit administrators, auditors, reviewers, and supervisory readers without becoming a legal treatise, medical-practice manual, or patient-facing guide.

### **What It Is Not:**

- Not a universal identity system, centralized PII registry, or medical surveillance architecture.
- Not a hospital ERP specification, pharmacy management system design, or electronic health record redesign.

- Not a prescription-law opinion, pharmacovigilance-only paper, clinical efficacy document, or treatment guideline.
- Not a public-health manifesto, political posture, or replacement for physicians, pharmacists, laboratories, regulators, insurers, or institutional review.
- Not a vendor-locked specification. No references to specific hospitals, pharmacies, insurers, manufacturers, AI models, cloud vendors, devices, or platforms.

## 0.4 How This Document Builds on Baseline Frameworks

This framework operationalizes concepts and artifact structures from four mandatory baselines and one optional baseline:

The vocabulary, artifact structures, role taxonomy, tiered supervision model, purpose-limitation

| Baseline  | Role in This Framework  |
|---|---|
| A — Ownership Integrity & Reconciliation Pack     | Evidence Set architecture, reconciliation break taxonomy, hold-only containment, offboarding proof bundles, examiner query patterns, content-addressed manifest conventions                   |
| B — Operationalization & Conformance Track        | Playbook structure, reference implementation profiles, conformance testing, governance charters, RACI conventions, incident coordination, change control, tiered supervisory access           |
| C — Operational Assurance Artifacts Addendum      | Evidence Pack manifest templates, logging taxonomy, examiner query packs, RACI matrices, liability trigger catalogs, tiered access purpose-limitation workflows                               |
| D — Programmable Privacy & ZKP Framework          | Tiered disclosure ladder (Tier 0/1/2), proof-carrying compliance artifacts, freshness/revocation discipline, Verifier Output Pack conventions, bounded verification, purpose codes, TTL bands |
| E — Payments & Settlement Constitution (Optional) | Settlement evidence production, precondition gates, escrow state models, failure-mode containment, evidence-linked settlement confirmation, intraday liquidity controls                       |

principles, TTL constraints, recertification cadence, and material change governance established in these baselines are reused throughout this document without modification. Where new constructs are introduced for healthcare-specific contexts, they are explicitly labeled as companion-layer additions and remain non-normative.

## 0.5 Core Thesis

*"In healthcare-adjacent digital infrastructure, the core operational problem is not only whether a medicine or decision exists, but whether institutions can reliably reconstruct what product was involved, where it came from, who authorized its movement or use, under which scope and time window, what safety-relevant evidence existed, and whether downstream release, dispensation, reimbursement, or review actions bound to the correct current-reference state."*

## 0.6 Primary Deliverables (This Document)

| # | Deliverable   | Sections  |
|---|---|-----------|
| 1 | Product Authenticity and Provenance Operating Model | Section 4 |

| #  | Deliverable  | Sections   |
|----|--|------------|
| 2  | Prescription, Authorization, and Issuer Legitimacy Model           | Section 5  |
| 3  | Chain-of-Custody, Storage, and Controlled Dispensation Integrity   | Section 6  |
| 4  | Proof-of-Safety and Context-Bound Clinical Decision Evidence       | Section 7  |
| 5  | Review, Recall, Quarantine, Correction, and Supersession Workflows | Section 8  |
| 6  | Evidence Artifacts, Manifests, Reconciliation, and Preservation    | Section 9  |
| 7  | Tiered Reviewer, Institutional, and Examiner Access                | Section 10 |
| 8  | Governance, Change Control, Recertification, and Accountability    | Section 11 |
| 9  | Financially Consequential Workflows (Optional/Conditional)         | Section 12 |
| 10 | Offboarding, Legacy Compatibility, and Reversibility               | Section 13 |
| 11 | Examiner Readiness: Checks Pack + Query Pack                       | Section 14 |
| 12 | Worked Examples (Paste-Ready)                                      | Section 15 |

## 0.7 How This Reduces Supervisory and Review Friction

Reviewers, auditors, institutional operators, and supervisory readers conducting oversight of medicine provenance, prescription integrity, dispensation correctness, or clinical-decision safety face friction when:

- Evidence formats vary across participants, requiring custom interpretation for each manufacturer, distributor, pharmacy, or hospital system.
- Reconciliation procedures lack standardization, making break detection inconsistent across product categories and institutional boundaries.
- Product provenance timelines cannot be replayed due to missing custody linkage or incomplete immutable logs.
- Authorization and prescription records operate without clear interfaces to product provenance or dispensation evidence.
- Recall, correction, and supersession events propagate inconsistently, leaving stale reference states in downstream systems.
- Offboarding procedures lack proof bundles, creating examination gaps during system transitions.

This framework reduces friction through:

| Friction Reduction Mechanism             | Baseline Analog                           | Healthcare Application   |
|--|---|--|
| Standardized Evidence Sets               | Ownership Evidence Set (OES) — Baseline A | Product Authenticity Evidence Set (PAES), Authorization Evidence Set (AES), Custody Evidence Set (CES), Safety Evidence Set (SES)                      |
| Defined Reconciliation Cadences          | Reconciliation Framework — Baseline A     | Continuous/event-driven/periodic cadences for provenance, custody, authorization, and safety state alignment   |
| Break Taxonomy and Hold-Only Containment | Break Classification — Baseline A         | Product-specific break categories (authenticity breaks, custody breaks, authorization breaks, safety breaks) with severity bands and containment logic |
| Tiered Reviewer Access                   | Tier 0/1/2 Model — Baselines B, C, D      | Purpose-limited reviewer access with TTL, post-access review, and bounded disclosure for product,  |

| Friction Reduction Mechanism | Baseline Analog                       | Healthcare Application  |
|------------------------------|---------------------------------------|---|
|                              |                                       | prescription, and safety evidence   |
| Examiner Query Packs         | Examiner Query Packs — Baselines A, C | Pre-defined queries for provenance replay, authorization verification, custody alignment, and safety-state validation |
| Offboarding Proof Bundles    | Offboarding Proof Bundle — Baseline A | Comprehensive manifests proving product, authorization, and custody integrity through system transitions              |

# 1. Non-Normative Disclaimer & Scope Boundaries

## 1.1 Scope

This framework addresses product authenticity, provenance integrity, authorization legitimacy, chain-of-custody, controlled dispensation, proof-of-safety, bounded reviewer access, and optional claim/reimbursement evidence for medicines, health products, and clinical decisions. The following topics are in scope:

**Product Authenticity and Provenance.** Operational evidence models for verifying that a medicine or health product is what it purports to be, originated from the claimed source, and traversed verified custody nodes from manufacture to dispensation. Includes content-addressed provenance manifests, batch/lot linkage logic, and authenticity evidence state definitions.

**Prescription, Authorization, and Issuer Legitimacy.** Operational evidence models for verifying that a prescription, instruction, or authorization was issued by a legitimate authority, within the correct scope and time window, and has not been revoked, superseded, or expired at the time of dispensation or release.

**Chain-of-Custody and Dispensation Integrity.** Custody event taxonomies, handoff evidence requirements, storage-state integrity logging, and controlled dispensation logic. Includes custody gap detection, stale custody evidence patterns, and contamination/substitution risk indicators.

**Proof-of-Safety and Clinical Decision Evidence.** Operational evidence models for recording and preserving safety-relevant states — including product safety profiles, clinical-decision-support outputs, contraindication checks, and high-impact instruction records — in formats that support independent reviewer reconstruction without requiring blind trust.

**Bounded Reviewer and Examiner Access.** Tiered access models (Tier 0/1/2) with purpose limitation, TTL enforcement, post-access review, and minimization discipline applied to product, prescription, custody, and safety evidence.

**Correction, Recall, Quarantine, and Supersession.** Hold-only containment, recall state transitions, correction and reclassification pathways, supersession chains, current-reference state determination, and non-destructive preservation of prior states.

**Governance and Accountability.** Change control, recertification cadence, material change triggers, RACI matrices, liability trigger catalogs, no-master-key posture, and distributed approval disciplines.

**Optional Claim and Reimbursement Evidence.** Where financially consequential workflows are in scope: evidence-linked release, claim or reimbursement gating, settlement/payout linkage, and hold or segmentation logic for financially unresolved states.

**Applicable Use Cases:**

- Medicine provenance verification from manufacturer to dispensation point
- Prescription authenticity and contextual validity assessment
- Institutional dispensing authorization and pharmacist verification
- Chain-of-custody verification for medicines, biologics, devices, and health products
- Clinical decision artifact review under minimal disclosure constraints
- Product recall, quarantine, hold, or withdrawal workflows
- Hospital, pharmacy, distributor, or manufacturer review workflows
- Reclassification, correction, supersession, or revocation of product or authorization states
- Reimbursement or claim progression where sufficient evidence linkage exists
- Offboarding and legacy system transitions with integrity preservation

**1.2 Explicit Non-Goals**

This document explicitly excludes the following:

| Excluded Topic   | Reason  |
|--|---|
| Universal identity systems, national ID, centralized PII registries                        | Prohibited by design. Framework centers on product authenticity, provenance, authority, and evidence — not on universal patient or citizen identification |
| Medical surveillance or population-monitoring architecture                                 | Framework supports institutional review and bounded verification, not pervasive monitoring of patient populations   |
| Hospital ERP specification or general EHR redesign   | Framework addresses evidence, reconciliation, and governance layers — not clinical system architecture  |
| Prescription-law opinions or pharmacovigilance determinations                              | Framework uses "alignment objectives" language. No legal conclusions about medical liability, product approval status, or regulatory permissibility       |
| Vendor-locked specifications   | No references to specific hospitals, pharmacies, insurers, manufacturers, AI models, cloud vendors, chains, devices, or platforms                         |
| Clinical efficacy, treatment guidelines, or standard-of-care determinations                | Framework does not assert medical truth or clinical correctness   |
| Public-health manifesto or health-policy advocacy  | Neutral, implementation-focused framing only  |
| Replacement for physicians, pharmacists, laboratories, regulators, or institutional review | Framework provides operational evidence layer; human judgment and institutional processes remain authoritative  |

**Deferred to Existing Institutional Processes:**

- Drug approval and marketing authorization determinations remain with competent regulatory authorities.
- Clinical judgment, diagnosis, and treatment selection remain with licensed practitioners operating within institutional governance.
- Pharmacy practice standards, dispensing authorities, and controlled substance scheduling remain with applicable pharmacy and drug regulatory bodies.
- Insurance coverage determinations, benefit eligibility, and claim adjudication remain with benefit administrators operating under applicable regulations.
- Laboratory testing, quality assurance, and product release certification remain with accredited laboratories and quality systems.

### 1.3 Baseline Anchors and Vocabulary Reuse

This framework creates no obligations beyond those already established by the baseline submissions and applicable institutional governance processes. Every control objective, artifact format, and governance procedure herein is derived from or extends an existing baseline construct. Where a concept from this document is not traceable to a baseline anchor, it is labeled explicitly as a "companion-layer addition" and remains non-normative pending baseline incorporation.

#### Baseline Terms Reused Without Modification:

| Term                                   | Origin            | Application in This Framework   |
|--|-------------------|---|
| Evidence Pack (EP)                     | Baselines A, B, C | Standardized artifact bundle proving authenticity, provenance, authorization, custody, or safety assertions   |
| EP Delta                               | Baselines A, C    | Incremental evidence artifact documenting a state change (e.g., product reclassification, prescription supersession, custody handoff)                           |
| Content-Addressed Manifest             | Baselines A, C    | Cryptographic hash-linked artifact inventory ensuring integrity and tamper detection  |
| Immutable Log Segment (ILS)            | Baselines A, C    | Tamper-evident, hash-chained log record capturing operational events with timestamps and actor identifiers  |
| Preservation Bundle                    | Baselines A, C    | Evidence collection for legal hold, incident investigation, recall, or dispute proceedings  |
| Tiered Supervisory Access (Tier 0/1/2) | Baselines B, C, D | Graduated access model: Tier 0 aggregate/statistical, Tier 1 event-triggered with purpose limitation, Tier 2 emergency with dual control and post-access review |
| Purpose Limitation                     | Baselines C, D    | Constraint limiting evidence access to specified review functions with documented justification   |
| TTL (Time-To-Live)                     | Baselines C, D    | Temporal access window with automatic expiration for reviewer access grants   |
| Post-Access Review                     | Baselines C, D    | Audit procedure following reviewer evidence retrieval to verify purpose compliance and access scope   |
| Hold-Only Containment                  | Baseline A        | Temporary restriction preventing state changes pending reconciliation or investigation  |
| Recertification (Recert) Cadence       | Baselines A, B, D | Periodic validation of control effectiveness, participant eligibility, and governance compliance  |
| Material Change Trigger                | Baselines A,      | Threshold event requiring notification, re-evaluation, and  |

| <b>Term</b>                | <b>Origin</b>  | <b>Application in This Framework</b>   |
|----------------------------|----------------|--|
|                            | B, D           | documentation  |
| Break Taxonomy             | Baseline A     | Classification system for reconciliation mismatches by type, severity, and resolution pathway              |
| No-Master-Key Posture      | Baselines A, B | No single-party override capability; all governance actions require distributed, multi-party authorization |
| Verifier Output Pack (VOP) | Baseline D     | Standardized artifact recording proof verification results, freshness timestamps, and revocation status    |

**Healthcare-Specific Additions (Minimal):**

New terms introduced in this framework are limited to concepts not addressed in baselines. Each addition is justified by the absence of an adequate baseline equivalent:

| <b>New Term</b>                              | <b>Definition</b>   | <b>Justification</b>  |
|--|---|---|
| Product Authenticity Evidence Set (PAES)     | Mapping construct linking product identity, manufacturer origin, batch/lot references, and provenance chain to baseline artifact types (EP, ILS, content-addressed manifests) | No baseline equivalent for product-level (non-securities) authenticity evidence         |
| Authorization Evidence Set (AES)             | Mapping construct linking prescription, authorization, or issuer legitimacy records to baseline artifact types  | No baseline equivalent for healthcare authorization evidence                            |
| Custody Evidence Set (CES)                   | Mapping construct linking medicine/product custody records, handoff confirmations, and storage-state logs to baseline artifact types  | Adapts Ownership Evidence Set (OES) concept from Baseline A to physical product custody |
| Safety Evidence Set (SES)                    | Mapping construct linking proof-of-safety records, clinical decision outputs, and safety-relevant assessment artifacts to baseline artifact types                             | No baseline equivalent for clinical safety evidence                                     |
| Proof-of-Safety State                        | Operationally evidenced condition indicating whether sufficient safety-relevant evidence exists to support a release, dispensation, or review decision                        | Healthcare-specific state category not present in securities baselines                  |
| Dispensation State                           | Operationally evidenced condition recording the controlled release of a medicine or health product to its intended recipient  | Healthcare-specific state category adapting "settlement state" logic from Baseline E    |
| Current-Reference State (healthcare context) | The most recent, non-superseded, non-revoked evidence state for a product, authorization, custody record, or safety assessment  | Reuses baseline concept; no modification, only domain-specific application              |

**1.4 No New Obligations / No Legal Conclusions Posture**

This framework does not:

- Create legal obligations for any party beyond those established by existing institutional governance, applicable regulations, and baseline pilot participation requirements.

- Assert legal conclusions about medical liability, product approval status, standard of care, malpractice, reimbursement entitlement, privacy law, authorship of clinical judgment, or regulatory permissibility.
- Determine whether any specific medicine, health product, clinical decision, or institutional arrangement is permitted, prohibited, or required under applicable law.
- Establish new supervisory bodies, regulatory authorities, or institutional oversight structures unless clearly implied by baseline governance patterns.

**"Alignment Objectives" Language.** When referencing healthcare-specific regulatory concepts — such as drug authentication, prescription monitoring, pharmacovigilance reporting, clinical decision-support oversight, good distribution practice, or reimbursement eligibility — this framework uses "alignment objectives" framing to indicate operational conformance goals without asserting legal interpretations or creating binding obligations. If a specific healthcare law, drug law, privacy law, reimbursement rule, clinical standard, medical-device rule, or cross-border medical regulation is not explicitly referenced in the baselines, this framework does not cite it.

## 1.5 Relationship to Existing Product, Clinical, Dispensation, Review, Audit, and Supervisory Processes

This framework is designed to complement, not replace, existing processes:

| Existing Process                                     | Framework Relationship  |
|--|---|
| Drug regulatory approval and marketing authorization | Framework does not determine approval status. Provenance and authenticity evidence reference approved product identifiers without asserting or challenging regulatory determinations                      |
| Pharmacy practice and dispensing standards           | Framework does not prescribe dispensing procedures. Dispensation evidence requirements provide standardized artifact structures for recording dispensation events within existing institutional workflows |
| Clinical decision-making and medical judgment        | Framework does not automate, replace, or override clinical judgment. Proof-of-safety evidence models provide reviewer-safe preservation and replay of decision-state contexts                             |
| Quality management and good distribution practice    | Framework does not replace quality systems. Custody and provenance evidence requirements provide standardized linkage between quality system outputs and reviewable evidence artifacts                    |
| Insurance and benefit administration                 | Framework does not determine coverage or reimbursement eligibility. Optional claim/reimbursement evidence models (Section 12) provide evidence-linked gating for financially consequential releases       |
| Institutional review boards and ethics committees    | Framework does not replace ethics oversight. Governance patterns provide accountability and change control structures compatible with institutional review requirements                                   |
| Regulatory examination and supervisory oversight     | Framework provides examiner-ready artifacts, standardized query packs, and tiered access patterns designed to integrate with existing examination processes   |

## 2. Problem Statement: Authenticity, Proof-of-Safety, and Review Friction in Medicines and Clinical Decisions

### 2.1 Medicines and Health Products Increasingly Move Through Fragmented Digital and Institutional Workflows

The operational landscape for medicines and health products has shifted from relatively linear manufacturer-to-pharmacy supply chains toward complex, multi-party, digitally mediated workflows involving contract manufacturers, third-party logistics providers, wholesale redistributors, group purchasing organizations, central fill pharmacies, mail-order dispensation platforms, hospital integrated delivery networks, and specialty pharmacy channels. Each participant operates its own recordkeeping systems, applies its own evidence standards, and produces artifacts in proprietary formats.

This fragmentation creates three operational consequences directly relevant to product integrity and reviewer access:

**Evidence Fragmentation.** A single medicine's journey from active pharmaceutical ingredient sourcing through finished product release, distribution, and dispensation may generate evidence artifacts across six or more institutional systems with no shared artifact format, no common content-addressing scheme, and no cross-system reconciliation discipline. The reconciliation break patterns identified in Baseline A — where mismatches between registry records, ledger positions, and custody proofs created examiner friction in tokenized securities — manifest with equal severity when provenance records, custody logs, and dispensation records exist in incompatible systems without reconciliation interfaces.

**Authority Fragmentation.** Prescribing authority, dispensation authority, and release authority may be established, verified, and recorded in separate systems with no operational linkage. A prescriber's authority may be validated at issuance but never re-verified at dispensation; a dispensation authorization may reference a prescription identifier without confirming that the prescription has not been revoked or superseded; a release decision may proceed without confirming that the releasing authority has current, non-expired credentials for the product category in question.

**Review Fragmentation.** When a dispute, recall, adverse event, or supervisory inquiry requires reconstruction of what happened, reviewers must manually gather evidence from multiple systems, reconcile timestamps across different clock sources, interpret proprietary log formats, and assemble a timeline without standardized evidence packs, content-addressed manifests, or examiner query packs. The examination burden described in Baseline C — where inconsistent logging and unstandardized evidence formats slowed supervisory review in tokenized securities contexts — is directly analogous.

### 2.2 Counterfeit, Substitution, Stale-Authority, and Provenance-Break Conditions Create Operational and Safety Risk

Four categories of integrity failure create operational and safety risk in medicine and health product workflows:

| <b>Integrity Failure Category</b> | <b>Operational Manifestation</b>   | <b>Evidence Gap</b>   |
|-----------------------------------|--|---|
| Counterfeit product entry         | Product enters dispensation pipeline without verifiable provenance linking it to an authorized manufacturer and approved production batch                | No content-addressed provenance manifest; no batch/lot linkage to manufacturer evidence; no authenticity evidence set       |
| Product substitution              | Authentic product is replaced with different product (different formulation, dosage, or active ingredient) at a custody transition point                 | Custody handoff records lack content-addressed product identity verification; no integrity check at custody boundary        |
| Stale authority                   | Prescription, authorization, or release instruction references an issuer whose credentials have expired, been revoked, or been restricted since issuance | No real-time or freshness-window-bounded authority validation at dispensation; no EP Delta recording authority state change |
| Provenance break                  | Gap in custody chain where product's whereabouts, storage conditions, or custodial responsibility cannot be documented                                   | Missing or incomplete custody event records; no hold-only containment trigger for unresolved custody gaps                   |

These categories are not mutually exclusive. A provenance break may mask a substitution event; a stale authority condition may enable dispensation of a product that should have been subject to hold-only containment pending re-authorization. The operational significance is that each category requires evidence artifacts — not assertions, inspections, or post-hoc investigations — that can be produced, reconciled, and reviewed in a standardized manner.

## **2.3 Prescriptions, Instructions, and Clinical-Decision Outputs Are Often Recorded Poorly, Detached from Context, or Not Reviewer-Safe**

Prescription records, clinical instructions, and clinical-decision-support outputs occupy a supervisory blind spot in many institutional environments. Three patterns contribute:

**Assertion-Without-Evidence.** A prescription is recorded as "valid" without linking to evidence artifacts demonstrating that the issuer held appropriate authority, that the authority was current at the time of issuance, that the prescription scope (product, quantity, duration, refill conditions) was within the issuer's authorized practice, and that no superseding or revoking event has occurred. The prescription's operational status is an assertion, not an evidenced state.

**Context Detachment.** A clinical-decision-support output is recorded as a recommendation or alert without preserving the evidence context — the patient parameters, formulary state, contraindication database version, and algorithmic version — that existed at the time the output was generated. When the output is later reviewed (in a dispute, adverse event investigation, or quality review), the reviewer cannot reconstruct the decision context. This is the clinical analog of the "proof freshness" problem addressed in Baseline D: a compliance proof that cannot be linked to its evidence state at the time of generation is operationally unreliable.

**Reviewer Opacity.** Clinical-decision artifacts may be stored in formats that are accessible only through the originating system, requiring the reviewer to either access the system directly (creating access scope, purpose limitation, and audit trail concerns) or accept a system-generated summary at face value. Neither approach satisfies the bounded verification discipline established in baseline frameworks, where reviewer-safe outputs are designed to provide sufficient evidence for independent verification without requiring full system access or blind trust.

## 2.4 Product State, Authorization State, Dispensation State, and Claim/Reimbursement State Are Frequently Conflated

A recurring operational problem in healthcare workflows is the conflation of distinct state categories:

| State Category             | Operational Question  | Why Conflation Creates Risk  |
|----------------------------|---|--|
| Product Authenticity State | Is this the product it purports to be, from the claimed source, in the expected condition?      | An authentic product with an invalid authorization should not be dispensed; conflating product authenticity with authorization validity masks authorization failures   |
| Authorization State        | Is the prescription, instruction, or release authorization valid, current, and within scope?    | A valid authorization for the wrong product should trigger a reconciliation break; conflating authorization validity with product identity masks product mismatch  |
| Dispensation State         | Has the product been released to the intended recipient under controlled conditions?            | A correctly dispensed product based on a subsequently recalled batch should trigger post-dispensation action; conflating dispensation completeness with ongoing safety state masks recall propagation failures |
| Claim/Reimbursement State  | Does sufficient evidence exist to support a financially consequential release or payout?        | A reimbursed dispensation based on subsequently revoked authorization should trigger adjustment; conflating payment status with authorization currency masks stale-authority claims                            |
| Proof-of-Safety State      | Does sufficient safety-relevant evidence exist to support the release or dispensation decision? | Safety evidence that has been superseded or classified as stale should prevent new dispensation; conflating historical safety evidence with current safety state masks evidence drift                          |

Baseline frameworks — particularly Baseline A's treatment of ownership state, custody state, and settlement state as operationally distinct categories requiring separate evidence and reconciliation — provide the architectural precedent for maintaining these distinctions.

## 2.5 Institutions Need Bounded Verification Paths Rather Than Pervasive Disclosure or Blind Trust

The supervision dilemma identified in Baseline D — where examiners require complete, auditable evidence while participants require that sensitive attributes not be pervasively exposed — manifests with equal intensity in healthcare contexts. Three healthcare-specific dimensions amplify the tension:

**Patient Privacy.** Clinical decision evidence, prescription records, and dispensation logs contain or reference patient health information that is subject to institutional confidentiality policies and alignment objectives regarding health data protection. Pervasive disclosure of these records to reviewers, auditors, or supervisory readers without purpose limitation, TTL constraints, and minimization discipline creates privacy risk.

**Commercial Sensitivity.** Manufacturer provenance records, distributor pricing arrangements, pharmacy formulary configurations, and benefit administrator adjudication logic may contain commercially sensitive information. Review access must be bounded to the specific evidence required for the review purpose — not expanded to include commercially sensitive attributes that are not relevant to the review question.

**Cross-Institutional Complexity.** A single dispensation event may involve evidence artifacts from a manufacturer (provenance), a prescriber (authorization), a distributor (custody), a pharmacy (dispensation), a clinical system (safety evidence), and a benefit administrator (claim/reimbursement). Review of the dispensation event may require evidence from all six parties, each operating under different institutional governance, different evidence formats, and different disclosure policies. Bounded verification — where a reviewer can confirm specific operational states without requiring full record disclosure from all parties — is operationally necessary.

The tiered disclosure ladder (Tier 0 / Tier 1 / Tier 2) and proof-carrying compliance artifact patterns established in Baseline D provide the operational framework for this bounded verification. This framework applies those patterns to product, authorization, custody, and safety evidence in healthcare contexts.

## **2.6 Disputes, Recalls, and Review Actions Require Replayable Evidence, Not Only Screenshots, Ad Hoc Attestations, or Disconnected Logs**

When a dispute, recall, adverse event, or supervisory inquiry arises, the operational requirement is evidence replay — the ability to reconstruct the relevant state at a specific point in time from standardized, content-addressed, tamper-evident artifacts.

Current healthcare workflows frequently fall short of this requirement:

**Recall Scenarios.** A product recall affecting a specific batch/lot requires identification of all dispensation events linked to that batch, all current custody holders, and all downstream claim or reimbursement events. Without content-addressed provenance manifests linking batch/lot identifiers to custody records and dispensation events, recall scope determination depends on manual investigation, partial serialization data, and distributor cooperation — none of which produce auditable, examiner-ready evidence.

**Adverse Event Investigation.** Investigation of an adverse event requires reconstruction of the product provenance (was the correct product dispensed?), authorization state (was the prescription valid and current?), dispensation conditions (was the correct dose and formulation released?), and safety-evidence state (what decision-support outputs, contraindication checks, or clinical assessments existed at the time?). Without preservation bundles and evidence replay capability, investigators reconstruct timelines from screenshots, email chains, and ad hoc system exports.

**Dispute Resolution.** Disputes between parties — manufacturer and distributor regarding product integrity, prescriber and pharmacy regarding authorization scope, pharmacy and benefit administrator regarding reimbursement eligibility — require evidence that both parties can independently verify. Without standardized evidence sets, content-addressed manifests, and examiner query packs, dispute resolution depends on each party producing its own version of events in proprietary formats, with no shared reconciliation framework.

The baseline frameworks — particularly Baseline A's reconciliation framework, Baseline C's preservation bundle specifications, and Baseline B's evidence pack playbooks — provide the operational patterns for evidence replay, preservation, and reconstruction. This framework applies those patterns to medicine, health product, and clinical decision contexts.

## **2.7 High-Impact Release or Reimbursement Decisions Should Not Proceed on Materially Unresolved Evidence States**

A design principle carried forward from baseline frameworks — particularly Baseline E's treatment of settlement finality as an evidence-backed condition, not an assertion — applies with direct operational relevance to healthcare:

**A dispensation decision should not proceed when the product's authenticity state is unresolved.** If provenance evidence is incomplete, custody integrity is unverified, or authenticity evidence fails reconciliation, the operationally sound response is hold-only containment pending resolution — not dispensation followed by post-hoc investigation.

**A release decision should not proceed when the authorization state is materially ambiguous.** If the prescriber's authority cannot be verified against current credentials, if the prescription's validity window is disputed, or if a superseding instruction may exist, the operationally sound response is escalation to bounded reviewer access — not release based on the most recent cached authorization state.

**A reimbursement or payout decision should not proceed when evidence linkage to the dispensation event is materially unresolved.** If the dispensation evidence cannot be reconciled with the authorization evidence and the product provenance evidence, financially consequential release creates liability exposure. Evidence-linked settlement confirmation — the pattern from Baseline E — requires that payout progression depend on sufficient evidence state, not on the passage of time or the absence of objection.

**A clinical-decision-dependent action should not proceed when the decision's evidence context has been superseded.** If the formulary, contraindication database, or decision-support algorithm version referenced by a clinical-decision output has been materially updated since the output was generated, the output's proof-of-safety contribution must be re-evaluated before it supports downstream actions.

These are operational control objectives, not legal requirements. This framework does not determine the specific thresholds, escalation criteria, or hold durations applicable to any particular institutional context. It provides the evidence architecture, reconciliation discipline, break taxonomy, and governance patterns that allow institutions to implement these control objectives within their own operational and regulatory environments.

### 3. Definitions & Neutral Taxonomy (Baseline-Aligned)

This section defines the operational state categories and evidence constructs used throughout the framework. Definitions are operational — they describe evidence conditions, not legal conclusions. Baseline terms are reused without modification; healthcare-specific additions are minimal and explicitly justified.

#### 3.1 Product Authenticity State

**Operational Definition.** The product authenticity state is the operationally evidenced condition indicating whether a medicine or health product can be verified as originating from the claimed manufacturer, produced in the claimed batch/lot, and conforming to the claimed formulation and specifications — based on available provenance evidence, content-addressed manifests, and integrity checks.

**State Values:**

| State Value  | Meaning   | Evidence Requirement   | Operational Consequence   |
|--------------|---|--|---|
| VERIFIED     | Product identity confirmed against manufacturer origin evidence, batch/lot records, and content-addressed provenance manifest     | Complete Product Authenticity Evidence Set (PAES) with all required fields populated and integrity checks passed | Product eligible for downstream custody transfer, dispensation, or release  |
| UNRESOLVED   | Product identity cannot be confirmed or denied — evidence is incomplete, stale, or under investigation                            | Partial PAES with documented gaps; investigation ILS initiated   | Hold-only containment pending resolution; no dispensation or release        |
| FAILED       | Product identity fails verification — evidence contradicts claimed identity, provenance break detected, or integrity check failed | PAES with failure documentation; Preservation Bundle initiated   | Immediate hold; quarantine workflow; incident escalation per severity band  |
| NOT_ASSESSED | No authenticity verification has been performed   | No PAES exists   | Product may not proceed to dispensation; assessment required before release |

**Non-Legal Framing.** A VERIFIED authenticity state indicates that operational evidence artifacts are complete and consistent. It does not constitute a regulatory determination of product approval, a certification of therapeutic efficacy, or a legal guarantee of product safety. When reviewers assess product authenticity state, they evaluate whether evidence artifacts are present, internally consistent, reconciled against provenance records, and retrievable — not whether the product is approved, safe, or efficacious under applicable law.

**Baseline Analog.** This state category adapts the "record of ownership" operational definition from Baseline A (Section 2.1), where ownership integrity was defined through evidence completeness rather than legal ownership rights. The same evidence-first, non-legal framing applies.

### 3.2 Provenance State

**Operational Definition.** The provenance state is the operationally evidenced condition documenting the complete chain of origin, manufacture, packaging, and distribution-pathway for a medicine or health product — from raw material sourcing or finished-product release through each custody transition to the current holder.

**State Values:**

| State Value   | Meaning   | Minimum Evidence  |
|---------------|---|---|
| COMPLETE      | Full provenance chain documented from manufacturer release to current custody holder with no gaps                       | Content-addressed provenance manifest; all custody handoff records present; storage-condition logs linked |
| PARTIAL       | Provenance chain has documented segments but at least one custody transition lacks evidence                             | Partial manifest with gap indicators; ILS documenting known coverage and known gaps                       |
| BROKEN        | Provenance chain contains a confirmed break — a custody transition where evidence is absent, contradictory, or tampered | Break detection report; Preservation Bundle capturing break evidence; hold-only containment triggered     |
| RECONSTRUCTED | Provenance break previously detected has been resolved through investigation and compensating evidence                  | Original break evidence preserved; reconstruction evidence with approval logs; post-review ILS            |

**Provenance Scope.** Provenance state covers the product's physical journey and condition history. It does not extend to clinical efficacy, therapeutic classification, or regulatory approval history. Provenance evidence includes: manufacturer identity and batch/lot reference, packaging and labeling evidence, storage-condition records (temperature, humidity, light exposure where applicable), custody handoff confirmations at each transition node, and content-addressed integrity markers linking each segment to the preceding one.

**Baseline Analog.** Provenance state adapts the chain-of-custody evidence patterns from Baselines A and B, where custody evidence packs (CEP) documented asset control and segregation, and content-addressed storage (Baseline C) ensured tamper-evident linkage across evidence segments.

### 3.3 Issuer / Prescriber / Authorizer Legitimacy State

**Operational Definition.** The issuer/prescriber/authorizer legitimacy state is the operationally evidenced condition indicating whether the entity that issued a prescription, instruction, authorization, or release decision held appropriate authority at the time of issuance — as documented by credential evidence, scope records, and currency checks.

**State Values:**

| State Value | Meaning   | Evidence Requirement  |
|-------------|---|---|
| CONFIRMED   | Issuer's authority verified against current credential evidence; scope, jurisdiction, and role validated; no revocation or restriction detected       | Authorization Evidence Set (AES) with credential reference, scope verification, currency check, and revocation status |
| EXPIRED     | Issuer's credentials or authority expired at or before the time of the relevant action  | AES with expiry detection record; EP Delta documenting transition from CONFIRMED to EXPIRED                           |
| REVOKED     | Issuer's authority has been revoked by the credentialing body or governance process   | AES with revocation record; ILS documenting revocation event and downstream impact assessment                         |
| RESTRICTED  | Issuer holds authority but with scope limitations that may affect the specific action (product category, jurisdiction, practice setting, time window) | AES with restriction detail; scope-match verification record  |
| UNVERIFIED  | No verification of issuer authority has been performed or verification is pending   | No complete AES; assessment pending workflow initiated  |

**Non-Legal Framing.** Legitimacy state documents whether operational evidence of authority exists, is current, and is consistent. It does not constitute a legal determination of licensure, a finding of unauthorized practice, or a conclusion about malpractice liability. When reviewers assess issuer legitimacy state, they evaluate the evidence trail — not the underlying legal relationship between the issuer and the credentialing body.

**Freshness Requirement.** Issuer legitimacy state is subject to freshness discipline inherited from Baseline D's proof freshness model. A legitimacy state confirmed at time T may not be relied upon at time T+N without re-verification if N exceeds the applicable freshness window for the authority type. Default freshness windows are defined in Section 5.4.

### 3.4 Prescription / Instruction Validity State

**Operational Definition.** The prescription/instruction validity state is the operationally evidenced condition indicating whether a specific prescription, clinical instruction, or authorization document is current, within its intended scope, and has not been superseded, revoked, or expired at the time of the downstream action (dispensation, release, review, or reimbursement).

**State Values:**

| State Value | Meaning  | Key Evidence   |
|-------------|--|--|
| VALID       | Prescription is current, within scope, issued by confirmed-legitimate authority, not superseded or revoked | Complete prescription record linked to AES; scope-match confirmation; freshness check passed |
| EXPIRED     | Prescription validity window has elapsed   | Expiry timestamp in prescription record; EP Delta documenting transition                     |
| SUPERSEDED  | A newer prescription or instruction has replaced this one for the same                                     | Supersession chain record; pointer to superseding prescription; prior                        |

| State Value | Meaning   | Key Evidence   |
|-------------|---|--|
|             | product/patient/scope   | state preserved  |
| REVOKED     | Prescription has been explicitly revoked by the issuer, a governance body, or a regulatory action                                   | Revocation record with authority reference; ILS documenting revocation event |
| SUSPENDED   | Prescription validity is temporarily held pending investigation, review, or correction  | Hold-only containment record; investigation workflow ILS                     |
| PARTIAL     | Prescription is valid for some components of the intended action but not all (e.g., valid for product but expired for refill count) | Partial validity assessment with component-level detail                      |

**Supersession Discipline.** Prescription supersession follows the versioning and supersession discipline from Baseline A, where prior ownership states were preserved non-destructively when superseded by corrections. A superseded prescription remains available as historical evidence; its state is preserved in the supersession chain, and the current-reference state points to the superseding document.

### 3.5 Chain-of-Custody State

**Operational Definition.** The chain-of-custody state is the operationally evidenced condition documenting the sequence of custodial responsibility for a medicine or health product, including each handoff event, storage period, and condition record from the product's entry into the documented chain through its current custodial position.

**State Values:**

| State Value   | Meaning   | Evidence Requirement   |
|---------------|---|--|
| INTACT        | Complete, unbroken chain from entry point to current custodian; all handoff events documented and content-addressed | Custody Evidence Set (CES) with all handoff records, storage logs, and content-addressed linkage             |
| GAPPED        | One or more custody transitions lack evidence documentation   | CES with gap indicators; gap severity assessment; hold-only containment if gap exceeds materiality threshold |
| COMPROMISED   | Evidence of unauthorized custody event, storage violation, or tampering detected                                    | CES with compromise evidence; Preservation Bundle; quarantine workflow triggered                             |
| RECONSTRUCTED | Custody gap previously detected has been resolved through investigation and compensating evidence                   | Gap evidence preserved; reconstruction documentation with approval chain                                     |

**Custody Event Taxonomy (Preview).** Full custody event taxonomy is provided in Section 6.1. Events include: receipt, handoff, storage-entry, storage-exit, temperature-excursion, repackaging, quarantine-entry, quarantine-release, dispensation, return, destruction, and recall-acknowledgment. Each event generates an ILS record with content-addressed integrity markers.

**Baseline Analog.** Chain-of-custody state directly adapts the custody evidence and chain-of-custody patterns from Baselines A and B. The "Evidence Equivalence Principle" from Baseline A (Section

2.2) applies: regardless of the underlying recordkeeping architecture, participants must demonstrate auditable authority, replayability, reconciliation integrity, and examiner access.

### 3.6 Dispensation / Release State

**Operational Definition.** The dispensation/release state is the operationally evidenced condition recording the controlled transfer of a medicine or health product from a custodial entity to its intended recipient — whether a patient, a clinical unit, a downstream dispensation point, or an authorized consumer — under conditions that link the release to a valid authorization, verified product identity, and intact custody chain.

**State Values:**

| State Value | Meaning   | Prerequisites   |
|-------------|---|---|
| RELEASED    | Product has been dispensed or released to the intended recipient under documented conditions                    | Product authenticity VERIFIED; authorization VALID; custody chain INTACT; dispensation record generated |
| HELD        | Product is physically available but release is blocked pending resolution of an evidence condition              | Hold-only containment active; at least one prerequisite state unresolved or under investigation         |
| RETURNED    | Product has been returned by the recipient and re-entered custody chain with documented return event            | Return event record; re-custody evidence; product re-assessment triggered                               |
| RECALLED    | Product has been recalled from the recipient or downstream custody; recall acknowledgment and return documented | Recall event record; acknowledgment evidence; return or destruction confirmation                        |

**Settlement Analog.** Dispensation/release state is the healthcare analog of settlement state in Baseline E. The principle that settlement finality is an "evidence-backed condition, not an assertion" (Baseline E, Section 0.4) applies directly: dispensation is operationally final when all prerequisite evidence states are satisfied and the dispensation evidence pack is generated — not when the product physically leaves the dispensation counter.

### 3.7 Proof-of-Safety State

**Operational Definition.** The proof-of-safety state is the operationally evidenced condition indicating whether sufficient safety-relevant evidence exists to support a release, dispensation, or high-impact clinical decision — as documented by safety evidence artifacts, clinical decision records, contraindication assessments, and any applicable algorithmic or decision-support outputs.

**State Values:**

| State Value  | Meaning  | Evidence Requirement  |
|--------------|--|---|
| SUFFICIENT   | Required safety evidence classes are present, current, and internally consistent | Safety Evidence Set (SES) with all required evidence classes populated; freshness checks passed |
| INSUFFICIENT | One or more required safety evidence classes                                     | SES with gap assessment;  |

| State Value | Meaning   | Evidence Requirement   |
|-------------|---|--|
|             | are missing, stale, or inconsistent   | escalation triggered per materiality threshold   |
| SUPERSEDED  | Safety evidence was previously sufficient but has been superseded by updated evidence (e.g., new contraindication data, updated formulary, revised clinical protocol) | Supersession record; prior SES preserved; re-assessment required                           |
| DISPUTED    | Safety evidence is under review, challenged, or subject to conflicting assessments  | Dispute record; hold-only containment where applicable; reviewer access workflow initiated |

**Not a Medical Conclusion.** Proof-of-safety state records whether operational evidence artifacts exist and are current. It does not determine whether a product is safe, whether a clinical decision is correct, or whether a treatment is appropriate. Institutions, clinicians, and regulators make safety determinations; this framework provides the evidence layer that supports, documents, and preserves those determinations for independent review.

**Evidence Classes Supporting Proof-of-Safety.** Detailed evidence classes are defined in Section 7.2. Classes include: product safety profile references, contraindication assessment records, drug interaction screening outputs, clinical decision-support outputs, prescriber clinical notes (where relevant to safety determination), and formulary/protocol version references.

### 3.8 Product Recall / Quarantine / Hold State

**Operational Definition.** The product recall/quarantine/hold state is the operationally evidenced condition indicating whether a medicine or health product is subject to containment, restriction, or withdrawal from the supply chain or dispensation pipeline — and, if so, under what authority, scope, and conditions.

#### State Values:

| State Value | Meaning   | Governance Requirement  |
|-------------|---|---|
| ACTIVE      | Product is in normal operational flow; no recall, quarantine, or hold in effect           | Standard reconciliation cadence applies   |
| HOLD        | Product is subject to hold-only containment pending investigation or resolution           | Hold record with authority, scope, and duration; no dispensation or transfer permitted                  |
| QUARANTINED | Product has been physically or logically segregated from dispensable inventory            | Quarantine record with reason, authority, and conditions for release; segregation verification evidence |
| RECALLED    | Product is subject to recall; downstream holders notified; return or destruction required | Recall notification record; scope determination; acknowledgment tracking; return/destruction evidence   |
| WITHDRAWN   | Product has been permanently  | Withdrawal record with authority;   |

| State Value        | Meaning  | Governance Requirement  |
|--------------------|--|---|
|                    | removed from supply chain by manufacturer or regulatory action         | downstream propagation evidence; disposal or return documentation                           |
| RELEASED_FROM_HOLD | Product was previously held and has been released following resolution | Hold release record with resolution evidence, approval chain, and post-release verification |

**Hold-Only Containment Principle.** Inherited from Baseline A: when evidence integrity is uncertain, the operationally sound response is hold-only containment — restricting state changes while preserving all evidence for investigation. Hold-only containment does not imply fault, violation, or deficiency; it is a precautionary operational control. Release from hold requires documented resolution, approval, and post-release verification.

### 3.9 Correction / Supersession / Revocation State

**Operational Definition.** The correction/supersession/revocation state records the governance posture of any evidence artifact, authorization, or product state — specifically whether it has been corrected, replaced by a newer version, or invalidated.

**State Values:**

| State Value | Meaning  | Preservation Requirement   |
|-------------|--|--|
| CURRENT     | Artifact or state is the active, authoritative version                                       | Standard reconciliation and recertification cadence  |
| CORRECTED   | A correction has been applied; the corrected version is now CURRENT; prior version preserved | Prior version retained with correction EP Delta; correction approval chain documented      |
| SUPERSEDED  | A newer version has replaced this artifact or state  | Supersession chain maintained; pointer to superseding version; prior content preserved     |
| REVOKED     | Artifact or state has been invalidated and may not be relied upon for new actions            | Revocation record with authority and reason; revocation propagation to dependent artifacts |

**Non-Destructive Preservation.** From Baseline A: corrections, supersessions, and revocations are never destructive. Prior states are preserved in their original form, linked to the correction or supersession record through EP Delta artifacts, and available for historical reconstruction and examiner replay. Silent overwrites — where a prior state is replaced without generating a correction record — are treated as governance violations.

### 3.10 Claim / Reimbursement / Settlement State (Where in Scope)

**Operational Definition.** The claim/reimbursement/settlement state is the operationally evidenced condition recording the progression of a financially consequential event — claim submission, adjudication, reimbursement authorization, and payout execution — linked to underlying product, authorization, dispensation, and safety evidence.

This state category is included only where the optional Baseline E (Payments & Settlement Constitution) is applied to healthcare claim and reimbursement workflows. Where financially consequential workflows are not in scope, this state category may be omitted.

**State Values:**

| State Value | Meaning  | Evidence Linkage Requirement  |
|-------------|--|---|
| SUBMITTED   | Claim submitted for adjudication                         | Claim record linked to dispensation evidence, authorization evidence, and product provenance evidence |
| ADJUDICATED | Claim reviewed; determination issued                     | Adjudication record with determination, linked to reviewed evidence artifacts                         |
| APPROVED    | Claim approved for reimbursement or payout               | Approval record with evidence sufficiency confirmation; all prerequisite states verified              |
| DENIED      | Claim denied with documented reason                      | Denial record with reason code and evidence references; appeal pathway documented                     |
| PAID        | Payout executed and settlement confirmed                 | Settlement confirmation linked to approval and underlying evidence chain                              |
| HELD        | Claim progression suspended pending evidence resolution  | Hold record; at least one linked evidence state is unresolved   |
| ADJUSTED    | Previously paid claim subject to post-payment correction | Adjustment record with reason, amount, and rebinding to corrected evidence                            |

**Evidence-Linked Settlement Confirmation.** From Baseline E: financially consequential actions should not proceed when evidence states are materially unresolved. Claim progression from SUBMITTED to APPROVED requires that linked product authenticity, authorization, custody, dispensation, and safety evidence states meet minimum completeness thresholds. The specific thresholds are institutional governance decisions — this framework provides the linkage architecture.

### 3.11 Current-Reference State vs. Historical Preserved State

**Operational Definition.** For any evidence artifact, authorization, product state, or reconciliation record, the framework distinguishes between the current-reference state (the most recent, non-superseded, non-revoked version that governs current operational decisions) and the historical preserved state (any prior version that has been superseded, corrected, or revoked but is retained for evidence replay and examination).

**Operating Rules:**

- Downstream actions — dispensation, release, reimbursement, review — bind to the current-reference state, not to historical states.
- Reconciliation checks verify that downstream actions reference the current version; actions bound to superseded states generate reconciliation breaks.
- Historical states are retained non-destructively per the correction/supersession/revocation discipline (Section 3.9). They are available for examiner replay, dispute investigation, and adverse event reconstruction.

- Supersession chains maintain ordered linkage from earliest to current version, enabling full version history traversal.

**Baseline Analog.** Directly adapts Baseline A's treatment of ownership state versioning, where registry records maintained version lineage with non-destructive preservation of superseded records and examiner-accessible version history.

### 3.12 Bounded Reviewer Access vs. Unrestricted Disclosure

**Operational Definition.** This framework distinguishes between bounded reviewer access — purpose-limited, TTL-bounded, tier-appropriate evidence access with post-access review — and unrestricted disclosure — the release of complete evidence records without purpose limitation, temporal boundary, or access audit.

**Operating Principle.** Bounded reviewer access is the default. Unrestricted disclosure is never the default in this framework. All reviewer, examiner, auditor, and supervisory access to product, authorization, custody, dispensation, safety, and claim evidence operates under the tiered access model inherited from Baselines B, C, and D:

| Access Tier                     | Default Scope   | Access Conditions  | Post-Access Requirement                                  |
|---------------------------------|---|--|--|
| Tier 0 — Aggregate/Statistical  | Aggregate counts, pass/fail rates, compliance percentages, coverage statistics                | No individual product, prescription, or patient-identifiable data                                | Standard audit log entry                                 |
| Tier 1 — Scoped/Event-Triggered | Specific evidence artifacts for identified review purpose within defined time window          | Documented purpose code; TTL assignment; pseudonymized references where possible                 | Post-access review within defined SLA                    |
| Tier 2 — Exceptional Reveal     | Full evidence access including underlying identity, raw provenance, or patient-linked records | Objective trigger; dual-control approval; strict TTL (default 48h); mandatory post-access review | Post-Access Review Pack (PARP) generated for every event |

**Optional Proof-Based Verification.** Where Baseline D's programmable privacy patterns materially improve bounded access, proof-carrying compliance artifacts may be used to satisfy reviewer queries without exposing underlying evidence. A reviewer may confirm that a product's authenticity state is VERIFIED, that an authorization's legitimacy state is CONFIRMED, or that a proof-of-safety state is SUFFICIENT through verifier output logs — without accessing the raw provenance records, credential details, or clinical decision inputs. This reduces disclosure scope while maintaining reviewer confidence.

## 4. Product Authenticity and Provenance Operating Model

### 4.1 Canonical Product Objects and Official Product-Reference Anchors

Every medicine or health product within the scope of this framework is identified through a canonical product object — a standardized reference record that anchors all downstream evidence artifacts to a specific product identity, formulation, and manufacturer origin.

#### Canonical Product Object (CPO) — Minimum Fields:

| Field                | Description  | Source  |
|----------------------|--|---|
| product_reference_id | Unique identifier for this product-formulation-manufacturer combination        | Manufacturer or authoritative product registry                                  |
| manufacturer_id      | Identifier for the manufacturing entity or authorized marketing holder         | Manufacturer credential or registry reference                                   |
| product_description  | Standardized description including active ingredient(s), strength, dosage form | Official product reference (alignment objective: product monograph equivalents) |
| batch_lot_reference  | Batch/lot identifier for the specific production run                           | Manufacturer production records   |
| packaging_reference  | Packaging configuration identifier (unit, bundle, case, pallet)                | Manufacturer packaging records  |
| production_date      | Date of manufacture or final release from production                           | Manufacturer release records  |
| expiry_date          | Product expiry or shelf-life end date  | Manufacturer specification  |
| content_address      | Cryptographic hash of the canonical product object                             | Computed at CPO generation; used for tamper detection                           |

**Official Product-Reference Anchors.** The CPO does not replace existing product identification systems (alignment objective: national drug codes, global trade item numbers, serialization identifiers, or similar product reference standards). It serves as a mapping construct that links institutional product identifiers to the evidence artifacts generated under this framework. Participants maintain linkage tables mapping their internal product identifiers to the CPO reference.

#### Integrity Rules:

- A CPO is generated once per product-batch-lot-manufacturer combination and does not change after generation. If a correction is required (e.g., erroneous batch reference), a correction EP Delta is generated, the original CPO is preserved as historical state, and a corrected CPO becomes the current-reference version.
- All downstream evidence artifacts — PAES, CES, AES, SES — reference the CPO content\_address, ensuring that evidence artifacts are bound to the correct product identity and cannot be misattributed to a different product without generating a tamper-detection alert.

## 4.2 Provenance Linkage Across Manufacture, Packaging, Handoff, Storage, Transfer, and Release

Product provenance is documented through an ordered sequence of provenance events, each generating an ILS record linked to the preceding event through content-addressed chaining. The provenance chain constitutes the operational proof that the product at any given custody node is the same product that was released from the manufacturing point.

### Provenance Event Sequence (Conceptual):

| Event Type             | Actor                             | Evidence Artifact Generated  | Content-Addressed Linkage             |
|------------------------|-----------------------------------|--|---------------------------------------|
| MANUFACTURE_RELEASE    | Manufacturer                      | Production release record with CPO reference, quality release attestation, batch/lot documentation | Genesis event; hash anchors the chain |
| PACKAGING              | Manufacturer or contract packager | Packaging record with unit-level identifiers, aggregation hierarchy, labeling confirmation         | Links to MANUFACTURE_RELEASE hash     |
| HANDOFF_TO_DISTRIBUTOR | Manufacturer → Distributor        | Handoff confirmation with sender/receiver identity, shipment reference, condition attestation      | Links to PACKAGING hash               |
| STORAGE_ENTRY          | Distributor warehouse             | Storage entry record with location, condition parameters, expected duration                        | Links to preceding HANDOFF hash       |
| STORAGE_EXIT           | Distributor warehouse             | Storage exit record with condition summary, any excursion records, next destination                | Links to STORAGE_ENTRY hash           |
| HANDOFF_TO_PHARMACY    | Distributor → Pharmacy/Hospital   | Handoff confirmation with receiving entity verification, product count, condition attestation      | Links to STORAGE_EXIT hash            |
| RECEIVING_VERIFICATION | Pharmacy/Hospital                 | Receiving record with product identity verification, count confirmation, condition check           | Links to HANDOFF_TO_PHARMACY hash     |

| Event Type           | Actor             | Evidence Artifact Generated  | Content-Addressed Linkage  |
|----------------------|-------------------|--|--|
| DISPENSATION_RELEASE | Dispensing entity | Dispensation record with recipient reference, authorization linkage, product identity confirmation | Links to RECEIVING_VERIFICATION hash; terminal event in dispensation chain |

Each event record is stored as an Immutable Log Segment per Baseline C conventions. The content-addressed linkage ensures that any break in the chain — a missing event, a tampered record, or an out-of-sequence insertion — is detectable through hash verification.

---

### 4.3 Content-Addressed Manifests and Immutable Provenance Records

**Provenance Manifest Structure.** For each product unit (or aggregation level tracked within the framework), a provenance manifest aggregates all provenance event records into a single content-addressed document that can be retrieved, verified, and replayed by reviewers.

#### Provenance Manifest — Conceptual Schema:

provenance\_manifest:

manifest\_id: [content\_address of manifest]

cpo\_reference: [content\_address of Canonical Product Object]

chain\_status: COMPLETE | PARTIAL | BROKEN

event\_count: [integer]

first\_event\_hash: [hash of genesis event]

last\_event\_hash: [hash of most recent event]

events:

- event\_type: MANUFACTURE\_RELEASE

- event\_hash: [content\_address]

- timestamp: [UTC]

- actor\_id: [pseudonymized or role-based]

- previous\_hash: null

- event\_type: PACKAGING

- event\_hash: [content\_address]

- timestamp: [UTC]

- actor\_id: [pseudonymized or role-based]

- previous\_hash: [hash of preceding event]

- ... [continued for all events]

integrity\_metadata:

```

manifest_generated_at: [UTC]
manifest_content_address: [self-referential hash]
chain_verification_result: PASS | FAIL

```

**Immutability and Tamper Detection.** Provenance records, once generated, are subject to Baseline C's content-addressed storage requirements: they are stored using cryptographic content hashes as identifiers, cannot be modified after storage without generating a new content address (which would break the chain linkage), and are subject to periodic integrity verification through hash chain validation.

**Correction Handling.** If a provenance event record contains an error (e.g., incorrect timestamp, wrong actor identifier), the original record is preserved and a correction EP Delta is generated per Section 3.9 conventions. The provenance manifest is updated to reference the correction, and the chain integrity metadata reflects the correction event. The original erroneous record remains available for historical review.

## 4.4 Authenticity Evidence States and Minimum Replay Requirements

For a product's authenticity state to reach VERIFIED, the following minimum evidence elements must be present, current, and internally consistent:

### Minimum Replay Requirements for VERIFIED Authenticity:

| Evidence Element                         | Source                            | Freshness Requirement                                | Failure Consequence                                |
|--|-----------------------------------|--|--|
| Canonical Product Object (CPO)           | Manufacturer or product registry  | Static (generated once per batch/lot)                | If CPO absent or tampered: NOT_ASSESSED            |
| Manufacturer identity verification       | Manufacturer credential evidence  | Per issuer legitimacy freshness window (Section 5.4) | If manufacturer identity unverified: UNRESOLVED    |
| Batch/lot release documentation          | Manufacturer production records   | Static (generated at release)                        | If batch/lot documentation absent: UNRESOLVED      |
| Provenance manifest                      | Aggregated from provenance events | Updated at each custody event                        | If manifest BROKEN: FAILED; if PARTIAL: UNRESOLVED |
| Most recent custody handoff confirmation | Current custodian                 | Event-driven (generated at each handoff)             | If most recent handoff unconfirmed: UNRESOLVED     |
| Content-addressed integrity verification | Hash chain validation             | Periodic (per reconciliation cadence)                | If integrity check fails: FAILED                   |

**Replay Capability.** A reviewer must be able to reconstruct a product's authenticity state at any historical point by traversing the provenance manifest, verifying each event's content-addressed linkage, confirming the CPO reference, and checking the manufacturer identity evidence that was current at that point. This replay capability is the healthcare analog of "ownership timeline replay" from Baseline A (Section 11).

## 4.5 Batch / Lot / Package / Custody-Reference Linkage Logic

Products exist at multiple aggregation levels — individual units, packages, cases, pallets, shipments — and the linkage between these levels must be maintained for provenance integrity, recall scope determination, and dispensation tracking.

### Aggregation Hierarchy:

Batch/Lot (production level)

└─ Pallet (logistics level)

└─ Case (distribution level)

└─ Package (pharmacy/hospital level)

└─ Unit (dispensation level)

### Linkage Rules:

- Each aggregation level references its parent level through a content-addressed pointer. A unit record references its parent package; a package references its parent case; and so on.
- Disaggregation events (e.g., a case is opened and individual packages are distributed to different pharmacies) generate ILS records documenting the disaggregation, the resulting child entities, and the custodial responsibility for each child.
- Aggregation events (e.g., units are repackaged into unit-dose configurations) generate ILS records with linkage to the source package and the resulting aggregation, including any repackaging entity identity and repackaging conditions.
- Recall scope determination traverses the aggregation hierarchy: a batch-level recall identifies all descendant packages and units through the linkage chain, enabling comprehensive downstream notification and containment.

**Custody-Reference Linkage.** Every custody event (Section 6.1) references both the product aggregation level at which custody was transferred and the provenance manifest segment applicable to that event. This cross-reference ensures that custody evidence and provenance evidence remain aligned and reconcilable.

---

## 4.6 Provenance Boundary Tests and Integrity Failure Conditions

Provenance boundary tests determine when enhanced controls are required — following the boundary test pattern established in Baselines A and D.

### Provenance Boundary Test Matrix:

| Condition                         | Trigger Threshold                      | Default Response      | Escalation Path   |
|-----------------------------------|--|-----------------------|---|
| Provenance chain gap detected     | Any missing handoff record in chain    | Hold-only containment | Tier 1 investigation; Tier 2 if unresolved within SLA         |
| Content-address mismatch in chain | Hash verification failure at any event | Immediate hold; alert | Incident response per severity; Preservation Bundle initiated |

| Condition  | Trigger Threshold   | Default Response   | Escalation Path   |
|--|---|--|---|
| Manufacturer identity evidence stale                   | Manufacturer credential exceeds freshness window                | Block dispensation; re-verification required                   | Tier 1 if re-verification fails                           |
| Storage condition excursion recorded                   | Temperature, humidity, or light parameter outside specification | Event-driven assessment; hold if excursion exceeds materiality | Product quality assessment per institutional procedures   |
| Repackaging event without authorized repackager        | Repackaging entity credentials unverified                       | Hold-only containment  | Tier 1 investigation of repackager authority              |
| Disaggregation without linkage to parent               | Child entity cannot be traced to parent aggregation level       | Hold-only containment; treat as provenance BROKEN              | Tier 1 investigation; potential FAILED authenticity state |
| Multiple products claiming same serial/unit identifier | Collision detected in unit-level references                     | Immediate hold on all affected units                           | Incident response; potential counterfeit investigation    |
| Provenance evidence unavailable for retrieval          | Content-addressed artifact not found in storage                 | Hold-only containment; availability incident logged            | Storage recovery procedures per Baseline C                |

**Application Guidance.** Scenarios not matching boundary tests follow standard reconciliation cadence (Section 9.5). Multiple boundary tests may apply simultaneously; the most conservative response governs. All boundary test determinations are logged in ILS for reviewer access.

## 4.7 What Counts as Operationally Verified Product Authenticity vs. Unresolved Authenticity Posture

This section establishes the operational distinction between a product whose authenticity has been verified through evidence and a product whose authenticity remains unresolved. The distinction governs whether the product may proceed to dispensation, release, or claim workflows.

### Operationally Verified Product Authenticity (VERIFIED State) Requires:

1. A complete, content-addressed Canonical Product Object (CPO) referencing the specific product-batch-lot-manufacturer combination.
2. A provenance manifest with COMPLETE chain status — no gaps, no integrity failures, no unresolved breaks.
3. Manufacturer identity evidence that is CONFIRMED under the issuer legitimacy model (Section 5) and within the applicable freshness window.
4. The most recent custody handoff confirmation, verified and content-addressed.
5. A passing content-addressed integrity verification on the complete evidence chain.

### Unresolved Authenticity Posture (UNRESOLVED State) Exists When:

Any one of the above five elements is absent, stale, under investigation, or fails verification — but no element has actively failed (contradiction, tampering evidence, or counterfeit indicator).

Unresolved posture triggers hold-only containment: the product may not proceed to dispensation or release, but is not quarantined or recalled. Resolution requires completing the missing evidence, refreshing stale evidence, or concluding the investigation with a determination that moves the state to either VERIFIED or FAILED.

**Failed Authenticity (FAILED State) Exists When:**

At least one evidence element actively contradicts the claimed product identity — provenance chain broken with tampering indicators, manufacturer identity evidence fails verification, content-addressed integrity check detects modification, or other indicators of counterfeit, diversion, or substitution. Failed state triggers quarantine, incident escalation, and Preservation Bundle generation.

**Operational Consequence Summary:**

| Authenticity State | Dispensation Permitted | Transfer Permitted                      | Claim/ Reimbursement Permitted    | Required Action                                      |
|--------------------|------------------------|---|-----------------------------------|--|
| VERIFIED           | Yes                    | Yes                                     | Yes (if other prerequisites met)  | Standard reconciliation cadence                      |
| UNRESOLVED         | No                     | Hold-only (no transfer to dispensation) | No                                | Complete evidence; resolve gaps                      |
| FAILED             | No                     | Quarantine only                         | No; adjustment if previously paid | Quarantine; incident escalation; Preservation Bundle |
| NOT_ASSESSED       | No                     | No                                      | No                                | Assessment required before any action                |

## 5. Prescription, Authorization, and Issuer Legitimacy Model

### 5.1 Authorization as an Evidenced Operational State, Not a Mere Assertion

In conventional healthcare workflows, a prescription or authorization is frequently treated as a document — something that exists or does not exist, that is presented or not presented. The operational problem is that a document's mere existence does not demonstrate that it was issued by a legitimate authority, within the correct scope, during a valid time window, and has not been superseded since issuance. Authorization-as-document treats authorization as a binary: present/absent. Authorization-as-evidence treats it as a multi-dimensional state: each dimension must be independently verifiable.

This framework models authorization as an operational state composed of independently verifiable dimensions:

| Dimension         | Operational Question   | Evidence Required  |
|-------------------|--|--|
| Issuer Legitimacy | Did the issuing entity hold appropriate authority at the time of issuance? | Issuer credential evidence (AES); legitimacy state CONFIRMED |

| Dimension                  | Operational Question  | Evidence Required  |
|----------------------------|---|--|
| Scope Validity             | Does the authorization cover the specific product, quantity, duration, and conditions of the intended action? | Scope-match verification record linking authorization parameters to intended action parameters |
| Temporal Currency          | Is the authorization within its validity window and has it not expired?                                       | Timestamp verification; expiry check; freshness confirmation                                   |
| Revocation Status          | Has the authorization been revoked or suspended since issuance?   | Revocation check against current revocation records; revocation status CLEAR or REVOKED        |
| Supersession Status        | Has a newer authorization replaced this one for the same scope?   | Supersession chain query; current-reference state determination                                |
| Channel / Context Validity | Was the authorization transmitted through a recognized channel and received by the intended party?            | Channel verification record; receipt confirmation  |

**Evidence-First Principle.** Each dimension requires an evidence artifact — not an assertion, attestation, or database entry. When an examiner reviews an authorization state, they can independently verify each dimension through the evidence chain rather than relying on a single party's representation that "the prescription is valid."

**Baseline Analog.** This approach directly adapts Baseline A's treatment of ownership as a multi-component evidence state (Section 2.1), where a "record of ownership" consisted of six independently verifiable operational components rather than a single authoritative assertion.

## 5.2 Who Can Authorize What, Under Which Role and Scope

Authorization authority is modeled through role-scope-product mappings that define which categories of actors may issue which categories of authorizations for which product categories. This framework does not prescribe specific role definitions — those remain with applicable institutional governance and credentialing bodies — but establishes the evidence structure for documenting and verifying authority claims.

### Role-Scope-Product Authority Matrix (Conceptual Template):

| Role Category            | Authorization Type                        | Product Scope  | Scope Constraints   | Evidence Class                                 |
|--------------------------|---|--|---|--|
| Licensed prescriber      | Prescription (new, renewal, modification) | Products within prescriber's authorized practice scope         | Jurisdiction, practice setting, specialty restrictions      | Prescriber credential + scope attestation      |
| Institutional authorizer | Formulary-based release authorization     | Products on institutional formulary                            | Institutional affiliation, formulary version, clinical unit | Institutional credential + formulary reference |
| Pharmacist / dispenser   | Dispensation authorization                | Products authorized for dispensation at the dispensation point | Pharmacy licensure, dispensation category restrictions      | Dispensation credential + site authorization   |
| Delegated                | Prescription under                        | Products within  | Delegation  | Delegation record +                            |

| Role Category        | Authorization Type                        | Product Scope                                 | Scope Constraints   | Evidence Class  |
|----------------------|---|---|---|---|
| prescriber           | delegation protocol                       | delegation scope                              | instrument, supervising prescriber reference, protocol limits                 | supervising prescriber AES                              |
| Emergency authorizer | Emergency dispensation authorization      | Products required for immediate clinical need | Emergency declaration record, time-limited scope, post-hoc review requirement | Emergency authorization record + clinical justification |
| Recall authority     | Recall, withdrawal, or hold authorization | Products subject to safety action             | Regulatory authority or manufacturer quality authority                        | Recall authority credential + safety evidence reference |

**Non-Prescriptive Framing.** This framework does not determine which roles are authorized to perform which actions — those determinations are institutional and regulatory governance decisions. The matrix provides the evidence architecture: for any authorization event, the framework requires that the authorizer's role, scope, and product authority be documented in evidence artifacts that can be independently verified.

**Authority Delegation.** Where authorization is delegated (e.g., a nurse practitioner prescribing under physician delegation, a pharmacy technician dispensing under pharmacist supervision), the delegation chain must be documented as an evidence chain linking the delegate's action to the delegator's authority. Each delegation link includes: the delegation instrument (protocol, order set, standing order), the delegator's AES (confirming the delegator's authority to delegate), the scope limitations of the delegation, and the temporal validity of the delegation.

---

### 5.3 Time-Bounded, Location-Bounded, Channel-Bounded, and Purpose-Bounded Authorization

Authorizations in healthcare are inherently bounded — they do not confer unlimited authority to dispense any product, at any time, in any location, through any channel. This framework requires that authorization bounds be documented as evidence fields and verified at each downstream action.

**Authorization Bound Categories:**

| Bound Type     | Definition   | Evidence Field  | Verification Method   |
|----------------|--|---|---|
| Time Bound     | Authorization is valid only within a defined temporal window (issue date → expiry date, or issue date + defined duration)              | validity_start, validity_end, duration_limit                  | Timestamp comparison at time of downstream action; expired authorizations trigger EXPIRED state |
| Location Bound | Authorization is valid only at specified dispensation locations, within specified jurisdictions, or within specified practice settings | authorized_locations[], jurisdiction_codes[], setting_types[] | Location-match verification comparing dispensation point against authorized locations           |

| Bound Type     | Definition   | Evidence Field                             | Verification Method  |
|----------------|--|--|--|
| Channel Bound  | Authorization is valid only when transmitted and received through recognized channels (e.g., electronic prescribing network, institutional order system)     | authorized_channels[], transmission_record | Channel verification confirming that authorization was received through a recognized pathway |
| Purpose Bound  | Authorization is valid only for specified clinical purposes or patient populations (e.g., specific indication, clinical trial enrollment, compassionate use) | purpose_codes[], population_restrictions[] | Purpose-match verification comparing intended use against authorized purposes                |
| Quantity Bound | Authorization specifies maximum quantities, refill limits, or dosage ceilings  | max_quantity, refill_count, dosage_ceiling | Quantity accumulation tracking; threshold breach triggers hold                               |
| Product Bound  | Authorization is specific to identified product(s) and does not extend to substitutes unless explicitly noted  | authorized_products[], substitution_policy | Product-match verification against CPO references  |

**Bound Verification at Dispensation.** Before a dispensation event proceeds, each applicable bound must be verified against current conditions. A single bound failure (expired time window, unauthorized location, exceeded quantity) generates a reconciliation break and triggers hold-only containment on the dispensation. The dispensation may proceed only if the bound failure is resolved through re-authorization, correction, or escalated approval per institutional governance.

## 5.4 Prescription Validity, Renewal, Expiry, Revocation, and Supersession Discipline

Prescription validity is not a static attribute — it is a dynamic state subject to renewal, expiry, revocation, and supersession events, each of which generates evidence artifacts.

### Prescription Lifecycle State Machine:

```

ISSUED → VALID → [RENEWED → VALID] → EXPIRED
    ↘ SUSPENDED → [REINSTATED → VALID | REVOKED]
    ↘ SUPERSEDED (pointer to superseding prescription)
    ↘ REVOKED

```

### Lifecycle Event Evidence Requirements:

| Lifecycle Event | Actor                                     | Evidence Generated   | State Transition                    |
|-----------------|---|--|-------------------------------------|
| Issuance        | Prescriber                                | Prescription record with all bound fields; AES linkage; issuer legitimacy confirmation | → VALID                             |
| Renewal         | Prescriber (same or authorized successor) | Renewal record referencing original prescription; updated                              | VALID → VALID (new validity window) |

| Lifecycle Event | Actor  | Evidence Generated  | State Transition           |
|-----------------|--|---|----------------------------|
|                 |  | bounds; fresh AES confirmation  |                            |
| Expiry          | System/automated   | Expiry detection record with timestamp; EP Delta  | VALID → EXPIRED            |
| Suspension      | Prescriber, institution, or governance body                    | Suspension record with reason and authority; hold-only containment on dependent dispensation events | VALID → SUSPENDED          |
| Reinstatement   | Authority that imposed suspension                              | Reinstatement record with resolution evidence and approval chain                                    | SUSPENDED → VALID          |
| Supersession    | Prescriber (issuing replacement)                               | Superseding prescription record; supersession chain linkage; prior prescription preserved           | VALID → SUPERSEDED         |
| Revocation      | Prescriber, institution, governance body, or regulatory action | Revocation record with authority and reason; downstream impact assessment                           | Any active state → REVOKED |

**Freshness Windows for Prescription Validity:**

| Authorization Type                         | Default Freshness Window  | Re-Verification Trigger  | Rationale   |
|--|---|--|---|
| Acute prescription (single-fill)           | Valid until filled or expired (per prescription terms)                                    | At dispensation  | Single-use; no ongoing freshness concern beyond expiry              |
| Chronic prescription (multi-fill / refill) | Verify at each refill event   | Each refill triggers re-check of issuer legitimacy and revocation status | Authority may change between refills                                |
| Institutional standing order               | Verify per institutional recertification cadence (alignment objective: at least annually) | Recertification event or material change trigger                         | Standing orders may outlive the authorizing physician's affiliation |
| Emergency authorization                    | Valid for defined emergency window only (typically 24–72 hours per institutional policy)  | Expiry of emergency window   | Time-limited by design; post-hoc review required                    |
| Delegated prescription                     | Verify delegation instrument validity at each dispensation                                | Each dispensation triggers delegation freshness check                    | Delegation may be revoked independently of the prescription         |

**Supersession Chain Discipline.** Adopted from Baseline A's ownership version lineage: when a prescription is superseded, the framework maintains an ordered chain linking the superseded prescription to its replacement. The superseded prescription's state becomes SUPERSEDED and includes a pointer to the superseding prescription's record. The superseding prescription's record includes a pointer to the superseded prescription. Both are content-addressed and preserved non-destructively.

## 5.5 Issuer / Prescriber / Institutional Authority Validation

Authority validation is the process of confirming that the entity claiming authorization authority actually holds the claimed authority at the time of the relevant action. This process generates Authorization Evidence Set (AES) artifacts.

### AES Minimum Fields:

| Field                    | Description   | Source  |
|--------------------------|---|---|
| issuer_reference_id      | Pseudonymized or role-based identifier for the authorizing entity                       | Institutional credential system                             |
| credential_reference     | Pointer to the issuer's active credential artifact                                      | Credentialing body or institutional records                 |
| authority_type           | Category of authority claimed (prescribing, dispensing, delegating, recalling)          | Credential content  |
| scope_attestation        | Documented scope of authority (product categories, practice settings, jurisdictions)    | Credentialing body attestation                              |
| currency_check_timestamp | Timestamp of the most recent verification that the credential is active and not revoked | Verification process output                                 |
| revocation_check_result  | Result of revocation check (CLEAR, REVOKED, RESTRICTED, UNAVAILABLE)                    | Revocation list or status registry query                    |
| freshness_status         | CURRENT, EXPIRING, or EXPIRED relative to applicable freshness window                   | Computed from currency_check_timestamp and freshness window |
| evidence_content_address | Self-referential content hash of this AES record  | Computed at generation                                      |

### Validation Workflow (Conceptual):

1. At authorization event (prescription issuance, dispensation authorization, release decision), the system queries for the issuer's current credential status.
2. The credential reference is checked against the applicable revocation list or status registry.
3. The scope attestation is compared against the specific action parameters (product, location, purpose) to confirm scope match.
4. The results are recorded in an AES artifact, content-addressed and stored as an ILS.
5. If validation fails (credential expired, revoked, restricted, or scope mismatch), the authorization state transitions to the appropriate failure value (EXPIRED, REVOKED, RESTRICTED, or UNVERIFIED) and hold-only containment is triggered on dependent downstream actions.

**Optional Proof-Based Validation.** Where Baseline D's programmable privacy patterns are applied, authority validation may use proof-carrying compliance artifacts to confirm that an issuer satisfies authority requirements without exposing the issuer's full credential details. A verifier output

confirming "issuer holds prescribing authority for product category X within jurisdiction Y" provides bounded verification without disclosing the issuer's identity, license number, or practice address to the dispensation system. The VOP is stored and available for Tier 1 or Tier 2 reviewer access if escalation occurs.

---

## 5.6 Authorization-State Diffs and EP Delta Treatment

Authorization states change over time. Each change — renewal, expiry, revocation, suspension, supersession, scope modification — generates an EP Delta artifact documenting the transition.

### EP Delta for Authorization State Changes — Structure:

ep\_delta:

```
delta_id: [content_address]
authorization_reference: [content_address of affected authorization]
previous_state: [state value before change]
new_state: [state value after change]
change_type: RENEWAL | EXPIRY | REVOCATION | SUSPENSION |
             REINSTATEMENT | SUPERSESSSION | SCOPE_MODIFICATION
change_authority: [identifier of entity or process causing change]
change_timestamp: [UTC]
change_evidence: [content_address of supporting evidence]
downstream_impact:
  affected_dispensation_events: [count or list of affected events]
  hold_actions_triggered: [count or list of holds initiated]
  notification_records: [content_addresses of notifications sent]
previous_delta_hash: [content_address of preceding EP Delta, if any]
delta_content_address: [self-referential hash]
```

**Chaining.** EP Deltas for a given authorization form an ordered chain, enabling reviewers to traverse the complete authorization history from issuance through all state transitions. Each delta references the preceding delta through content-addressed linkage, creating a tamper-evident authorization timeline.

**Downstream Impact Assessment.** When an authorization state changes (especially to REVOKED, SUSPENDED, or EXPIRED), the EP Delta includes a downstream impact assessment identifying dispensation events, claims, or release decisions that were bound to the now-changed authorization. Dependent actions bound to a revoked or expired authorization generate reconciliation breaks requiring investigation and potential adjustment.

---

## 5.7 Exceptional Reviewer Access When Authorization Evidence Is Disputed or Incomplete

When authorization evidence is disputed — parties disagree about issuer legitimacy, scope validity, or revocation status — or when evidence is incomplete — credential verification unavailable, revocation list unreachable, or issuer records partially missing — the framework provides structured escalation to exceptional reviewer access.

### Escalation Triggers for Authorization Disputes:

| Condition   | Default Response  | Escalation Path   |
|---|---|---|
| Issuer legitimacy disputed by dispensing entity                               | Hold-only containment on pending dispensation; AES review initiated                   | Tier 1: scoped review of issuer credential evidence within TTL window   |
| Prescription scope contested (product, quantity, or indication disagreement)  | Hold-only containment; scope-match evidence gathered from both parties                | Tier 1: scoped review of authorization bounds and dispensation parameters   |
| Revocation status unavailable (revocation list unreachable)                   | Conservative FAIL per Baseline D convention; hold-only containment                    | Tier 1 after defined grace period; Tier 2 if prolonged unavailability   |
| Supersession chain ambiguity (multiple prescriptions claiming current status) | Hold-only containment on all affected prescriptions                                   | Tier 1: supersession chain reconciliation; Tier 2 if conflicting evidence from different institutional sources                          |
| Emergency authorization validity challenged post-hoc                          | Post-hoc review workflow; dispensation evidence preserved                             | Tier 1: review of emergency declaration evidence and clinical justification; Tier 2 if potential unauthorized dispensation              |
| Delegated authority validity questioned                                       | Hold-only containment on future delegated actions; prior actions preserved for review | Tier 1: review of delegation instrument, delegator AES, and delegation scope; Tier 2 if delegation may have been forged or unauthorized |

**Reviewer Access Discipline.** Even under escalation, reviewer access operates under bounded verification principles:

- Tier 1 reviewers access scoped evidence artifacts (specific AES records, prescription records, scope-match verification results) under documented purpose codes and TTL constraints.
- Tier 2 reviewers access underlying identity or credential details only when Tier 1 evidence is insufficient to resolve the dispute, with dual-control approval, strict TTL (default 48 hours), and mandatory Post-Access Review Pack generation.
- All reviewer access events are logged as ILS records, content-addressed, and subject to post-access audit.

**Resolution Outcomes.** Authorization dispute resolution results in one of the following:

1. **Authorization confirmed:** AES updated with dispute resolution evidence; hold released; dispensation may proceed.

2. **Authorization corrected:** Correction EP Delta generated; prior authorization state preserved; corrected authorization becomes current-reference.
3. **Authorization revoked:** Revocation EP Delta generated; all dependent dispensation and claim events identified for downstream impact assessment.
4. **Authorization remains unresolved:** If resolution cannot be achieved within governance SLA, the matter escalates to institutional governance (alignment objective: medical staff committees, pharmacy and therapeutics committees, or regulatory authorities as applicable). Hold-only containment remains in effect pending final resolution.

## 6. Chain-of-Custody, Storage, and Controlled Dispensation Integrity

### 6.1 Custody Event Taxonomy

Every transition in custodial responsibility for a medicine or health product generates a custody event — a discrete, evidence-producing occurrence that is logged as an Immutable Log Segment (ILS), content-addressed, and linked to the preceding custody event through hash chaining. The custody event taxonomy defines the recognized event categories, required evidence fields, and downstream implications.

#### Custody Event Categories:

| Event Code         | Event Name            | Description   | Minimum Evidence Fields  |
|--------------------|-----------------------|---|--|
| CUS_RECEIPT        | Receipt               | Product received by a new custodial entity from a transferring entity           | Receiving entity ID, transferring entity ID, product CPO reference, quantity, condition attestation, timestamp |
| CUS_HANDOFF        | Handoff               | Custody formally transferred between entities with confirmation from both sides | Sender confirmation, receiver confirmation, product reference, handoff conditions, transport reference         |
| CUS_STORAGE_ENTRY  | Storage Entry         | Product enters a defined storage location with documented conditions            | Storage facility ID, location reference, entry conditions (temperature, humidity), expected duration           |
| CUS_STORAGE_EXIT   | Storage Exit          | Product departs a storage location  | Exit timestamp, condition summary for storage period, excursion records (if any), destination reference        |
| CUS_TEMP_EXCURSION | Temperature Excursion | Storage conditions exceeded defined parameters                                  | Excursion start/end timestamps, parameter range, severity classification, remedial action record               |

| Event Code             | Event Name            | Description  | Minimum Evidence Fields   |
|------------------------|-----------------------|--|---|
| CUS_REPACKAGE          | Repackaging           | Product repackaged into different aggregation units                                  | Repackaging entity ID, source unit references, resulting unit references, repackaging conditions, authority credential  |
| CUS_QUARANTINE_ENTRY   | Quarantine Entry      | Product placed in quarantine segregation   | Quarantine reason, authority reference, segregation location, expected review timeline                                  |
| CUS_QUARANTINE_RELEASE | Quarantine Release    | Product released from quarantine following review                                    | Release authorization, resolution evidence, post-quarantine condition assessment  |
| CUS_DISPENSATION       | Dispensation Release  | Product released to intended recipient under controlled conditions                   | Recipient reference (pseudonymized), authorization linkage, product identity verification, dispensing entity credential |
| CUS_RETURN             | Return                | Product returned from recipient or downstream custodian                              | Return reason, returning entity, product condition assessment, re-custody evidence                                      |
| CUS_DESTRUCTION        | Destruction           | Product destroyed under documented conditions  | Destruction authorization, method, witness record, disposal evidence, environmental compliance reference                |
| CUS_RECALL_ACK         | Recall Acknowledgment | Custodian acknowledges receipt of recall notification and reports affected inventory | Recall reference, affected inventory assessment, containment actions taken, response timeline                           |
| CUS_HOLD_ENTRY         | Hold Entry            | Product placed under hold-only containment pending investigation                     | Hold authority, reason, scope, affected product references, expected resolution timeline                                |
| CUS_HOLD_RELEASE       | Hold Release          | Product released from hold following resolution                                      | Release authorization, resolution evidence, approval chain  |

**Event Attribute Requirements.** Every custody event record must include, at minimum: a unique event identifier, a UTC timestamp synchronized to an authoritative time source, the event code from the taxonomy above, the acting entity identifier (pseudonymized or role-based), the affected product reference (CPO content address and aggregation level), the event outcome, the content address of the preceding custody event in the chain, and the self-referential content address of this event

record. These attribute requirements mirror the minimum event attributes from Baseline C's logging taxonomy (Section A.2).

**Event Chaining.** Custody events for a given product unit (or aggregation level) form a strictly ordered, content-addressed chain. Each event record contains the content hash of the preceding event, creating a tamper-evident sequence. Any insertion, deletion, or modification of an event record in the chain breaks the hash linkage and triggers an integrity failure alert. This chaining pattern is inherited directly from Baseline C's Immutable Log Segment architecture.

## 6.2 Storage-State Integrity and Transition Logging

Medicines and health products are frequently condition-sensitive — their safety and efficacy depend on maintenance of specified storage conditions throughout the custody chain. Storage-state integrity addresses the evidence requirements for documenting that storage conditions were maintained, and for recording and assessing deviations.

### Storage-State Evidence Requirements:

| Evidence Element           | Content  | Generation Trigger  | Freshness  |
|----------------------------|--|---|--|
| Storage condition baseline | Defined acceptable ranges for temperature, humidity, light, and other relevant parameters for the product category | Established at CPO generation from product specifications                                     | Static per product specification; updated only on product re-specification |
| Continuous condition log   | Periodic readings of actual storage conditions at the storage facility   | Automated sensor readings at defined intervals (alignment objective: per product sensitivity) | Continuous during storage period   |
| Excursion detection record | Automated alert when any monitored parameter exits the acceptable range  | Generated at moment of excursion detection  | Real-time  |
| Excursion assessment       | Documented evaluation of excursion severity, duration, and impact on product integrity                             | Generated following excursion event by qualified assessor                                     | Event-driven; must be completed within defined SLA per severity            |
| Storage period summary     | Aggregate condition report covering the full storage period for a product at a facility                            | Generated at CUS_STORAGE_EXIT event   | Event-driven at storage exit   |

### Excursion Severity Classification:

| Severity | Definition   | Default Response   | Escalation  |
|----------|--|--|---|
| Minor    | Parameter deviation within defined tolerance band; short duration; no expected impact on product integrity | Log excursion; include in storage period summary; no hold required | No escalation unless recurrent (3+ minor excursions in rolling 30 days) |
| Moderate | Parameter deviation exceeds tolerance band or duration   | Hold-only containment; excursion assessment                        | Tier 1 review if assessment cannot                                      |

| Severity | Definition   | Default Response   | Escalation   |
|----------|--|--|--|
|          | threshold; potential impact on product integrity   | required before release  | confirm product integrity  |
| Severe   | Parameter deviation significantly exceeds specification; extended duration; probable impact on product integrity                           | Immediate hold; quarantine workflow initiated; Preservation Bundle               | Incident escalation; Tier 1 or Tier 2 review depending on product category criticality |
| Critical | Parameter deviation indicating complete storage failure (e.g., cold-chain break for biologics, light exposure for photosensitive products) | Immediate quarantine; presumptive product integrity failure; Preservation Bundle | Incident response per institutional procedures; potential recall assessment            |

**Transition Logging.** Every transition between storage states — entry, exit, excursion detection, excursion resolution, condition parameter changes — generates an ILS record linked to the custody event chain. Storage transitions are cross-referenced with the product's provenance manifest to maintain alignment between custody evidence and provenance evidence.

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### 6.3 Handoff, Receipt, Transfer, Quarantine, Release, and Return Workflows

Each custody transition follows a defined workflow producing evidence artifacts at each step. The workflows below are presented as operational sequences — not as prescriptive institutional procedures, but as evidence-generation patterns that produce the artifacts required for downstream reconciliation and reviewer access.

#### Handoff/Receipt Workflow (Standard Custody Transfer):

Step 1: Transfer initiation

- Transferring entity generates handoff request with product reference, quantity, destination, and transport conditions
- ILS record: CUS\_HANDOFF (initiated)

Step 2: Transport documentation

- Transport conditions documented (carrier, route, expected duration, condition monitoring method)
- Transport evidence linked to handoff record

Step 3: Receipt and verification

- Receiving entity verifies: product identity (CPO match), quantity, condition, packaging integrity
- ILS record: CUS\_RECEIPT with verification result

Step 4: Reconciliation checkpoint

- Receiving entity's custody records reconciled against transferring entity's handoff records
- Discrepancies trigger reconciliation break workflow (Section 9.6)

#### Step 5: Custody chain update

- Product provenance manifest updated with new custody segment
- Content-addressed linkage established between preceding and new custody events

### **Quarantine Workflow:**

#### Step 1: Quarantine trigger

- Trigger condition identified (recall notification, quality alert, integrity failure, regulatory hold, custody anomaly)
- ILS record: CUS\_QUARANTINE\_ENTRY with trigger reference

#### Step 2: Physical/logical segregation

- Product physically or logically separated from dispensable inventory
- Segregation verification evidence generated

#### Step 3: Investigation

- Investigation workflow initiated per trigger type
- Investigation evidence logged as ILS records

#### Step 4: Determination

- Investigation concludes with one of:
  - (a) Release – product returns to ACTIVE state
  - (b) Continued hold – additional investigation required
  - (c) Destruction – product removed from supply chain
  - (d) Return to manufacturer – product returned for assessment
- Determination record with authority, evidence references, and approval chain

#### Step 5: Resolution execution

- Appropriate custody event generated (CUS\_QUARANTINE\_RELEASE, CUS\_DESTRUCTION, CUS\_RETURN)
- Provenance manifest updated; custody chain extended

### **Return Workflow:**

#### Step 1: Return initiation

- Returning entity documents return reason and product condition
- ILS record: CUS\_RETURN (initiated)

#### Step 2: Receiving assessment

- Receiving entity assesses returned product: identity verification, condition evaluation, custody history review
- Assessment record generated

#### Step 3: Disposition determination

- Product is either: re-entered into dispensable inventory (if assessment confirms integrity), quarantined (if assessment raises concerns), or destroyed (if product is no longer suitable)
- Disposition record with authorization

#### Step 4: Custody chain update

- Return event and disposition event added to custody chain
- Provenance manifest updated

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## 6.4 Controlled Dispensation and Release-State Logic

Dispensation is the terminal custody event in the standard product lifecycle — the controlled transfer of a medicine or health product to its intended recipient. Dispensation is operationally final when all prerequisite evidence states are satisfied and the dispensation evidence pack is generated. This section defines the precondition gates that must be verified before dispensation proceeds.

### Dispensation Precondition Gate (Conceptual):

| Gate                       | Verification Required  | Failure Response   |
|----------------------------|--|--|
| G1: Product Authenticity   | Product authenticity state = VERIFIED (Section 3.1)  | Dispensation blocked; hold-only containment              |
| G2: Authorization Validity | Prescription/authorization validity state = VALID (Section 3.4); issuer legitimacy state = CONFIRMED (Section 3.3) | Dispensation blocked; escalation to authorization review |
| G3: Scope Match            | Authorization bounds match dispensation parameters (product, quantity, location, purpose, channel) per Section 5.3 | Dispensation blocked; scope mismatch break generated     |
| G4: Custody Integrity      | Chain-of-custody state = INTACT (Section 3.5); no unresolved custody gaps or compromises                           | Dispensation blocked; custody gap investigation          |
| G5: Safety Evidence        | Proof-of-safety state = SUFFICIENT (Section 3.7); required safety evidence classes present and                     | Dispensation blocked; safety evidence review             |

| Gate                            | Verification Required   | Failure Response                               |
|---------------------------------|---|--|
|                                 | current   |  |
| G6: No Active Hold              | Product recall/quarantine/hold state = ACTIVE (Section 3.8); no hold, quarantine, or recall in effect                   | Dispensation blocked until hold resolved       |
| G7: Revocation Check (Optional) | Where Baseline D patterns applied: authorization and product-reference revocation checks passed within freshness window | Dispensation blocked; re-verification required |

**Gate Execution Logic.** All gates must pass before dispensation proceeds. Gates are evaluated in sequence; a failure at any gate halts the dispensation and triggers the specified failure response. Gate results are logged as part of the dispensation evidence record.

**Dispensation Evidence Record.** Upon successful gate completion and dispensation execution, a dispensation evidence record is generated containing: all gate verification results with timestamps, the dispensing entity's credential reference, the recipient reference (pseudonymized per institutional privacy policy), the product CPO reference, the authorization reference, the content-addressed linkage to the preceding custody event, and the self-referential content hash. This record becomes the terminal event in the product's custody chain for the dispensation pathway.

**Partial Dispensation.** Where a prescription authorizes multiple units or refills and dispensation occurs in increments, each partial dispensation generates its own evidence record. Quantity accumulation is tracked against the authorization's quantity bound (Section 5.3). When accumulated dispensation quantity reaches the authorization limit, further dispensation under the same authorization is blocked.

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## 6.5 Custody Gaps, Stale Custody Evidence, and Contamination / Substitution Risk Patterns

Custody integrity failures manifest through recognizable patterns. This section catalogs the primary risk patterns and maps each to the appropriate evidence response.

### Custody Risk Pattern Catalog:

| Risk Pattern  | Detection Method   | Evidence Indicator   | Response   |
|---|--|--|--|
| Custody gap — missing handoff                       | Provenance manifest review reveals event chain discontinuity; hash linkage breaks between events | CUS_HANDOFF expected but absent; hash chain break at expected transition point | Hold-only containment; Tier 1 investigation; UNRESOLVED provenance state             |
| Stale custody evidence — outdated condition records | Continuous condition log shows gap exceeding defined freshness threshold                         | Last condition reading exceeds staleness limit for product category            | Re-assessment required; dispensation blocked until fresh condition evidence obtained |
| Unauthorized custody event — unrecognized           | Custody event record contains actor identifier not in authorized                                 | Actor ID fails credential verification; no AES linkage                         | Immediate hold; incident escalation; Preservation Bundle;                            |

| <b>Risk Pattern</b>                                | <b>Detection Method</b>  | <b>Evidence Indicator</b>                                       | <b>Response</b>   |
|--|--|---|---|
| actor  | custodian registry   |   | potential<br>COMPROMISED<br>custody state   |
| Storage condition violation — unassessed excursion | Excursion detection record exists without corresponding excursion assessment       | CUS_TEMP_EXCURSION logged but no assessment record within SLA   | Hold-only containment until excursion assessment completed                                    |
| Product identity mismatch at receipt               | CUS_RECEIPT verification indicates product CPO mismatch with handoff documentation | Product reference in receipt record differs from handoff record | Immediate hold on affected product; reconciliation break; potential counterfeit investigation |
| Quantity discrepancy at handoff                    | CUS_RECEIPT quantity does not match CUS_HANDOFF quantity                           | Quantity fields diverge between sender and receiver records     | Reconciliation break; investigation per severity (minor variance vs. significant discrepancy) |
| Repackaging without authorization                  | CUS_REPACKAGE event lacks authorized repackager credential                         | Repackaging entity AES absent or unverified                     | Hold-only containment on repackaged units; Tier 1 investigation of repackager authority       |

**Contamination and Substitution Indicators.** While the framework does not perform laboratory analysis or physical inspection, certain evidence patterns indicate elevated contamination or substitution risk requiring institutional investigation: multiple products in the same custody chain with overlapping storage periods and incompatible storage requirements; product identity verification failures at multiple custody nodes in the same supply chain segment; custody gaps coinciding with known diversion or counterfeit activity patterns; and repackaging events by entities without documented repackaging authority.

## 6.6 Custody Replay for Disputes and Review Reconstruction

When a dispute, adverse event, or supervisory inquiry requires reconstruction of a product's custody history, the custody replay capability enables reviewers to traverse the complete custody event chain from any point to any other point.

### Replay Procedure (Conceptual):

1. **Scope definition.** Reviewer specifies the product reference (CPO), the time window, and the review purpose (purpose code per Baseline C/D conventions).
2. **Access authorization.** Reviewer access authorized at the appropriate tier (Tier 0 for aggregate custody statistics; Tier 1 for specific product custody chain; Tier 2 for underlying entity identities). TTL assigned. Access event logged.

3. **Chain retrieval.** Custody Evidence Set (CES) retrieved from content-addressed storage. Hash chain integrity verified — if any event record has been tampered with, the hash verification fails and an integrity alert is generated.
4. **Timeline reconstruction.** Custody events are assembled in chronological order, cross-referenced against the provenance manifest, and presented as a reviewable timeline. Each event includes the acting entity (pseudonymized at Tier 1; identified at Tier 2), the product reference, the event type, conditions, and evidence references.
5. **Gap identification.** Any custody gaps — periods where the product's custodial responsibility is undocumented — are flagged with the gap's duration, the last known custodian, and the next documented custodian.
6. **Post-access review.** Reviewer's access scope, findings, and any follow-up actions are documented in the Post-Access Review Pack per Baseline C/D conventions.

**Dispute-Specific Replay.** In custody disputes between parties (e.g., distributor and pharmacy disagreeing about product condition at handoff), the replay capability provides both parties' custody event records for the disputed transition. Discrepancies are classified as reconciliation breaks (Section 9.6) and resolved through the dispute-handling framework (Section 8.6).

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## 6.7 Offboarding or Recall-State Custody Continuity

When a product is subject to offboarding (transition to a legacy tracking system) or a recall, custody continuity must be maintained through the transition to ensure that the product's full custody history remains reconstructable.

### Recall-State Custody Continuity Requirements:

- When a recall is initiated (Section 8.2), all custody holders of affected products must acknowledge the recall (CUS\_RECALL\_ACK) and report their affected inventory.
- Products subject to recall remain in the custody chain — the recall does not erase or overwrite prior custody events. The recall generates additional custody events (acknowledgment, quarantine, return, or destruction) that extend the chain.
- Recall scope determination uses the aggregation hierarchy (Section 4.5) to identify all downstream units affected by a batch/lot-level recall. The custody chain for each affected unit is traversed to identify current custodians.
- Recall closure requires evidence that all affected units have been accounted for — returned, destroyed, quarantined, or otherwise resolved — with reconciliation between the recall scope determination and the cumulative custody event responses.

### Offboarding Custody Continuity Requirements:

- When a product's tracking transitions from the framework's evidence system to a legacy system, an offboarding proof bundle is generated per Baseline A (Section 12) conventions.
- The offboarding proof bundle includes the complete custody event chain for the product, the provenance manifest, all content-addressed integrity markers, and a final reconciliation checkpoint.

- The legacy system's ingestion of custody records is verified, and acceptance evidence is generated confirming that the legacy system accurately reflects the product's custody history at the point of transition.
  - Post-offboarding, the framework's copy of the custody evidence is archived with retention policies consistent with applicable institutional requirements (alignment objective: typically 7+ years).
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## **7. Proof-of-Safety and Context-Bound Clinical Decision Evidence**

### **7.1 Proof-of-Safety as Operational Evidence, Not a Legal or Medical Conclusion**

This framework treats proof-of-safety as an operational evidence condition — a documented state indicating that specified categories of safety-relevant evidence exist, are current, and are internally consistent for a given product, dispensation, or clinical decision. Proof-of-safety is not a determination that a product is safe, that a clinical decision is correct, or that a treatment is appropriate.

#### **What Proof-of-Safety Evidence Demonstrates:**

- That defined evidence classes were consulted, recorded, and preserved.
- That the evidence was current (within applicable freshness windows) at the time of the decision or release.
- That no unresolved conflicts exist between evidence classes (e.g., a contraindication flag and a release decision coexisting without resolution documentation).
- That the evidence context can be independently reconstructed by a reviewer without requiring access to the originating clinical system.

#### **What Proof-of-Safety Evidence Does Not Demonstrate:**

- That the product is safe in any absolute sense.
- That the clinical decision was medically correct.
- That the treatment will produce a favorable outcome.
- That the prescriber, pharmacist, or clinician exercised appropriate judgment.

These latter determinations remain the province of licensed practitioners, institutional review processes, quality systems, and competent regulatory authorities. The framework provides the evidence substrate that supports, documents, and preserves those determinations for independent review — it does not make the determinations.

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### **7.2 Evidence Classes Supporting Proof-of-Safety**

Proof-of-safety state is determined by the presence, currency, and internal consistency of defined evidence classes. The evidence classes are organized into two categories: product-level evidence (pertaining to the medicine or health product itself) and decision-level evidence (pertaining to a specific clinical decision, dispensation, or release).

### Product-Level Evidence Classes:

| Evidence Class                          | Description  | Freshness Requirement   | Source  |
|---|--|---|---|
| PS-01: Product safety profile reference | Pointer to the product's current safety information (alignment objective: approved labeling, product monograph, or equivalent) | Verified at product onboarding; re-verified at material change or recertification | Manufacturer or authoritative product registry                      |
| PS-02: Known adverse reaction profile   | Reference to the product's documented adverse reaction profile at the time of the relevant action                              | Updated per institutional governance cadence or upon manufacturer safety update   | Manufacturer safety communications; institutional formulary systems |
| PS-03: Storage condition compliance     | Evidence that product was stored within specified conditions throughout custody chain (Section 6.2)                            | Continuous during storage; summarized at each custody transition                  | Storage condition monitoring systems                                |
| PS-04: Product integrity confirmation   | Evidence that product's physical integrity (packaging, labeling, appearance) is consistent with specifications                 | At receipt and at dispensation  | Custody event records (CUS_RECEIPT, CUS_DISPENSATION)               |
| PS-05: Recall/withdrawal status         | Confirmation that product is not subject to active recall, withdrawal, or safety hold  | Verified at dispensation; freshness per reconciliation cadence                    | Recall status registry or institutional safety alert system         |

### Decision-Level Evidence Classes:

| Evidence Class  | Description  | Freshness Requirement   | Source  |
|---|--|---|---|
| DS-01: Contraindication screening output              | Record of contraindication assessment for the specific patient-product combination                       | Generated at or before dispensation; current to formulary version at time of assessment         | Clinical decision-support system or pharmacist review |
| DS-02: Drug interaction screening output              | Record of drug interaction assessment against the patient's known medication profile                     | Generated at or before dispensation; current to interaction database version at assessment time | Clinical decision-support system or pharmacist review |
| DS-03: Dosage/quantity appropriateness record         | Record of dosage or quantity verification against product specifications and authorization parameters    | Generated at dispensation; validated against authorization bounds                               | Dispensing system or pharmacist verification          |
| DS-04: Clinical decision-support output (high-impact) | Record of algorithmic or decision-support system output for high-impact clinical decisions (Section 7.3) | Generated at decision time; version-stamped to algorithm/database version                       | Clinical decision-support system                      |

| Evidence Class  | Description  | Freshness Requirement                            | Source                          |
|---|--|--|---------------------------------|
| DS-05: Prescriber clinical rationale (where applicable) | Documented prescriber rationale for decisions outside standard parameters (off-label use, dose escalation, therapeutic substitution) | Generated at authorization; preserved for review | Prescriber documentation system |

**Minimum Evidence Requirements by Action Type:**

| Action Type   | Required Product-Level Classes    | Required Decision-Level Classes        |
|---|-----------------------------------|--|
| Standard dispensation   | PS-01, PS-03, PS-04, PS-05        | DS-01, DS-02, DS-03                    |
| High-impact dispensation (narrow therapeutic index, biologics, controlled substances) | PS-01, PS-02, PS-03, PS-04, PS-05 | DS-01, DS-02, DS-03, DS-04             |
| Off-label or non-standard dispensation  | PS-01, PS-02, PS-03, PS-04, PS-05 | DS-01, DS-02, DS-03, DS-05             |
| Clinical decision review (post-hoc)   | PS-01, PS-02                      | DS-01, DS-02, DS-04 (where applicable) |

### 7.3 Context-Bound Decision States and Reviewer-Safe Outputs

High-impact clinical decisions — dose calculations for narrow therapeutic index products, contraindication overrides, formulary exception approvals, treatment protocol selections — generate decision-state evidence that must be preserved in a form enabling independent reviewer reconstruction.

**Context-Bound Decision State — Definition.** A context-bound decision state records the complete evidence context that existed at the moment a clinical decision was made or a decision-support output was generated. The "context-bound" qualifier distinguishes this from a free-standing decision record: the decision is meaningful only in the context of the evidence state that supported it.

**Context-Bound Decision State — Minimum Fields:**

| Field                             | Description  |
|-----------------------------------|--|
| decision_id                       | Unique content-addressed identifier for this decision record   |
| decision_type                     | Category of decision (dispensation approval, contraindication override, dosage calculation, formulary exception, protocol selection) |
| decision_timestamp                | UTC timestamp of decision execution  |
| decision_actor                    | Pseudonymized or role-based identifier for the decision-maker (clinician, pharmacist, system)  |
| evidence_snapshot                 | Content-addressed references to all evidence classes consulted at decision time (PS and DS classes per Section 7.2)                  |
| algorithm_version (if applicable) | Version identifier for any decision-support algorithm, formulary database, or interaction database used                              |
| input_parameters                  | Abstracted or categorized input parameters (not raw patient data by  |

| Field                                  | Description  |
|--|--|
| (abstracted)                           | default — per bounded disclosure principle)  |
| output_result                          | The decision-support output or decision determination  |
| override_flag                          | Boolean indicating whether the decision overrides a system-generated alert or recommendation |
| override_justification (if applicable) | Documented rationale for override, linked to DS-05 evidence class                            |
| content_address                        | Self-referential hash of the complete decision state record                                  |

**Reviewer-Safe Outputs.** The context-bound decision state is designed to be reviewer-safe — meaning a reviewer can independently assess the decision's evidence basis without requiring access to the originating clinical system. The reviewer examines:

- Whether the required evidence classes were present at decision time (completeness check).
- Whether the evidence was current at decision time (freshness check against the evidence snapshot timestamps and the applicable freshness windows).
- Whether the algorithm or database version was current at decision time (version consistency check).
- Whether any override was documented with justification (override accountability check).
- Whether the decision output is consistent with the evidence context as recorded (internal consistency check).

The reviewer does not need access to raw patient data, full clinical records, or the originating system's internal state. The bounded verification principle (Section 3.12) applies: Tier 1 review accesses the decision state record and evidence references under documented purpose code and TTL; Tier 2 review accesses underlying patient or clinician identifiers only under objective triggers with dual-control approval.

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## 7.4 High-Impact Instruction or Decision Review Posture

Not all clinical decisions require the same level of evidence preservation and review capability. The framework applies a graduated review posture based on the potential impact of the decision.

### Review Posture Classification:

| Review Posture | Applicable Decisions   | Evidence Requirement   | Preservation                                    |
|----------------|--|--|---|
| Standard       | Routine dispensation with standard safety checks; no alerts triggered; no overrides  | Product-level evidence classes (PS-01 through PS-05) and standard decision-level classes (DS-01 through DS-03) | Standard retention per institutional policy     |
| Enhanced       | Dispensation of high-risk products (narrow therapeutic index, biologics, controlled substances); decisions involving dose calculations near therapeutic boundaries | All applicable evidence classes including DS-04; context-bound decision state record generated                 | Extended retention; available for Tier 1 review |

| Review Posture | Applicable Decisions   | Evidence Requirement  | Preservation   |
|----------------|--|---|--|
| Exceptional    | Override of system-generated safety alert; off-label use; formulary exception; therapeutic substitution; emergency authorization | All applicable evidence classes including DS-04 and DS-05; context-bound decision state with override documentation | Preservation Bundle generated; available for Tier 1 and Tier 2 review; mandatory post-decision review within institutional SLA |

**Review Posture Determination.** The review posture is determined at decision time based on the decision type, the product category, and whether alerts or overrides are involved. The posture classification is recorded as a field in the decision state record and governs the evidence preservation and access requirements.

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## 7.5 Stale Evidence, Superseded Evidence, and Unresolved Safety-State Ambiguity

Safety evidence has a temporal dimension — evidence that was current at the time of a decision may become stale or superseded before downstream actions (additional dispensation, refill, reimbursement) are completed.

**Stale Evidence.** A safety evidence artifact is stale when the time elapsed since its generation exceeds the applicable freshness window for its evidence class. Stale evidence does not constitute a safety failure per se — it triggers a defined stale-evidence handling workflow:

1. Dispensation or release action blocked pending evidence refresh.
2. Re-verification performed against current databases, formularies, or safety information.
3. If re-verification confirms continued validity: evidence refreshed; action proceeds.
4. If re-verification reveals changed conditions (new contraindication, updated adverse reaction profile, changed formulation): safety evidence state transitions to SUPERSEDED; re-assessment required per Section 7.6.

**Superseded Evidence.** A safety evidence artifact is superseded when the underlying source data has been materially updated since the artifact's generation. Examples: a product's safety profile is updated with new adverse reaction information; the formulary version referenced by a decision-support output is replaced by a newer version with different recommendations; a contraindication database is updated with new interactions affecting the product in question.

Supersession does not retroactively invalidate prior decisions — decisions made in good faith based on the evidence state current at decision time are preserved as historical evidence. Supersession affects future actions: any new dispensation, refill, or release that would rely on superseded evidence must first refresh the evidence against the current source.

**Unresolved Safety-State Ambiguity.** The proof-of-safety state becomes DISPUTED (Section 3.7) when conflicting evidence classes coexist without resolution documentation. Examples: a contraindication screening output flagging a potential interaction and a dispensation authorization proceeding without documented override justification; a product safety update indicating new risks and a continued dispensation pattern without institutional re-assessment evidence. Unresolved

ambiguity triggers hold-only containment for future dispensation events and escalation per Section 7.6.

## 7.6 Escalation Thresholds for Review, Hold, Recall, or Manual Confirmation

When safety evidence conditions fail to meet the requirements for SUFFICIENT proof-of-safety state, the framework provides structured escalation rather than silent progression or categorical rejection.

### Safety Evidence Escalation Matrix:

| Condition  | Severity      | Default Response   | Escalation Path   | Preservation   |
|--|---------------|--|---|--|
| Required evidence class absent (e.g., DS-01 not generated before dispensation)         | High          | Dispensation blocked   | Tier 1: review of evidence gap; institutional remediation   | Evidence gap record preserved                                |
| Safety evidence stale beyond freshness window  | Moderate      | Dispensation blocked pending refresh                         | Re-verification workflow; Tier 1 if refresh reveals changed conditions  | Stale evidence record preserved alongside refreshed evidence |
| System-generated safety alert overridden without documentation                         | High          | Post-dispensation review triggered; future dispensation held | Tier 1: review of override circumstances; institutional governance notification                                   | Override event preserved as Preservation Bundle              |
| Product safety profile updated after dispensation but before next refill               | Moderate      | Next refill blocked pending re-assessment                    | Institutional safety re-assessment per updated profile; Tier 1 if re-assessment identifies patient safety concern | Updated profile and re-assessment evidence preserved         |
| Conflicting evidence classes without resolution  | High          | Dispensation blocked; DISPUTED safety state                  | Tier 1: review of conflicting evidence; clinical determination required   | Conflict record preserved; resolution documented             |
| Decision-support algorithm version recalled or deprecated                              | Moderate–High | Decisions relying on deprecated version flagged for review   | Institutional assessment of affected decisions; Tier 1 if scope is significant                                    | Algorithm version change record; affected decision inventory |
| Multiple safety evidence failures for same product across multiple dispensation points | Critical      | Product-level hold-only containment                          | Institutional safety review; potential recall assessment; Tier 2 if systematic failure suspected                  | Pattern detection evidence; Preservation Bundle for product  |

**Manual Confirmation Pathway.** For any safety evidence condition that blocks dispensation but does not indicate an actual safety risk (e.g., a system timeout preventing contraindication check, a database unavailability preventing interaction screening), the framework supports a manual confirmation pathway: a qualified clinician or pharmacist performs the safety assessment manually, documents the manual assessment with evidence class DS-05, and authorizes dispensation with the manual assessment serving as the evidence artifact. Manual confirmations are classified under the "Enhanced" or "Exceptional" review posture (Section 7.4) regardless of the product category.

## 7.7 Preservation and Replay for Safety-Relevant Decision States

Safety-relevant decision states are preserved for the duration applicable to the institutional retention policy (alignment objective: typically matching or exceeding the product's shelf life, the prescription's validity period, and any applicable regulatory retention requirement).

### Preservation Requirements:

| Element  | Preservation Duration   | Storage Requirements  |
|--|---|---|
| Context-bound decision state records                   | Per institutional retention policy; alignment objective: minimum 7 years or as required     | Content-addressed storage per Baseline C; integrity verification per reconciliation cadence |
| Evidence class artifacts referenced by decision states | Same as the decision state that references them   | Content-addressed storage; cross-reference linkage maintained                               |
| Override justification records                         | Extended retention — at least as long as the longest applicable review or litigation window | Content-addressed storage; flagged for legal-hold readiness                                 |
| Safety alert records (system-generated)                | Same as decision state retention  | Content-addressed storage; linked to decision state and override records                    |
| Algorithm/database version snapshots                   | At least one version beyond the referenced version (enabling version comparison)            | Version-controlled storage; retrievable by version identifier                               |

**Replay Capability.** A reviewer conducting post-hoc review of a safety-relevant decision must be able to reconstruct the decision context by retrieving the context-bound decision state record, verifying the content-addressed integrity of all referenced evidence artifacts, confirming the algorithm and database versions referenced, and assessing whether the decision output was consistent with the evidence context. This replay capability is the clinical-decision analog of "ownership timeline replay" from Baseline A and "settlement chain reconstruction" from Baseline E.

## 8. Review, Recall, Quarantine, Correction, and Supersession Workflows

### 8.1 Hold-Only Containment Logic

Hold-only containment is the framework's default response to evidence uncertainty. Inherited from Baseline A, the principle is that when evidence integrity is uncertain, the operationally sound response is restriction of state changes while preserving all evidence for investigation — not destructive correction, premature release, or categorical rejection.

#### Hold-Only Containment — Operating Rules:

- Hold prevents dispensation, release, transfer, claim progression, and any other state change for the affected product, authorization, or evidence artifact. It does not prevent investigation, evidence gathering, or reviewer access.
- Hold does not imply fault, violation, or deficiency. It is a precautionary control triggered by evidence conditions, not by determinations of wrongdoing.
- Hold is applied at the narrowest scope that addresses the evidence condition. A custody gap affecting a single product unit does not hold the entire batch unless the gap pattern suggests broader compromise.
- Hold entry and hold release are both logged as ILS records with content-addressed integrity. The hold record includes the trigger condition, the authority imposing the hold, the scope of affected items, and the expected resolution timeline.
- Hold release requires documented resolution evidence, approval from the appropriate authority (governance body, compliance function, or institutional decision-maker), and a post-release verification step confirming that the resolved evidence state supports the release.

#### Hold Scope Determination:

| Trigger Condition                            | Default Hold Scope   | Escalation to Broader Scope  |
|--|--|--|
| Single product unit — provenance gap         | Individual product unit  | If gap pattern repeats across units from same source, extend to source-level hold              |
| Authorization validity dispute               | Pending dispensation events linked to disputed authorization             | If dispute affects multiple authorizations from same issuer, extend to issuer-level review     |
| Safety evidence stale for product category   | Individual dispensation event pending evidence refresh                   | If staleness affects multiple products in same evidence class, extend to evidence-class review |
| Storage condition excursion (moderate+)      | Product units in affected storage location during excursion period       | If excursion severity is critical, extend to all products at facility                          |
| Custody chain integrity failure (hash break) | Product units in affected chain segment                                  | Incident-level investigation; scope determined by integrity failure analysis                   |
| Recall notification received                 | All product units matching recall scope (batch/lot, product, date range) | Per recall scope as defined by issuing authority   |

## 8.2 Recall and Quarantine State Transitions

Product recalls, quarantines, and safety holds follow a defined state transition model with evidence generation at each transition.

### Recall State Machine:

ACTIVE (normal operational flow)

- RECALL\_INITIATED (recall notification issued)
- RECALL\_ACKNOWLEDGED (custody holders acknowledge; inventory reported)
- QUARANTINED (affected products segregated)
- RETURNED (products returned to manufacturer/designated entity)
- DESTROYED (products destroyed under documented conditions)
- RE-ASSESSED (products assessed for potential re-release)
- RELEASED\_FROM\_RECALL (if re-assessment confirms safety)
- DESTROYED (if re-assessment confirms deficiency)
- RECALL\_CLOSED (all affected units accounted for)

### Recall Evidence Requirements at Each Transition:

| Transition                | Evidence Generated   | Accountability  |
|---------------------------|--|---|
| ACTIVE → RECALL_INITIATED | Recall notification record: affected product reference (CPO, batch/lot), recall reason, scope determination, issuing authority, urgency classification | Recall authority (manufacturer, regulatory body, or institutional quality function) |
| → RECALL_ACKNOWLEDGED     | Acknowledgment record from each downstream custody holder: affected inventory assessment, containment actions taken                                    | Each custody holder   |
| → QUARANTINED             | Quarantine entry records (CUS_QUARANTINE_ENTRY) for all identified units; segregation verification   | Custody holders   |
| → RETURNED or DESTROYED   | Return custody chain records or destruction evidence (CUS_DESTRUCTION) with witness documentation  | Custody holders and recall authority  |
| → RECALL_CLOSED           | Recall closure report: scope vs. resolution reconciliation (all affected units accounted for); open items documented; closure authorization            | Recall authority with governance approval   |

**Quarantine as Independent Action.** Quarantine may also be initiated independently of a recall — for example, in response to a custody integrity failure, a quality alert, or a regulatory hold. Independent quarantine follows the same custody event taxonomy (CUS\_QUARANTINE\_ENTRY, CUS\_QUARANTINE\_RELEASE) and evidence requirements, but is not linked to a recall scope determination.

## 8.3 Correction and Reclassification Pathways

Corrections address errors in evidence artifacts — incorrect timestamps, wrong product references, erroneous actor identifiers, miscategorized events — without destroying the original record.

### Correction Principles (Inherited from Baseline A):

1. **Non-destructive.** The original record is preserved in its original form. No silent overwrites.
2. **EP Delta generated.** Every correction produces an EP Delta artifact documenting the prior state, the corrected state, the correction reason, and the correction authority.
3. **Supersession chain maintained.** The corrected record becomes the current-reference state; the original record becomes historical preserved state with a pointer to the correction.
4. **Downstream impact assessed.** The correction EP Delta includes an assessment of downstream actions that relied on the original (now-corrected) record. Dependent actions may require re-verification or adjustment.
5. **Approval chain documented.** Corrections require documented authorization — the entity or governance process that approved the correction, the evidence basis for the correction, and the approval timestamp.

**Reclassification.** Reclassification is a specific type of correction where a product, authorization, or evidence artifact changes category. Examples: a product reclassified from standard dispensation to controlled substance; a prescription reclassified from renewal to new prescription due to changed clinical circumstances; a safety evidence class reclassified from SUFFICIENT to SUPERSEDED following a product safety update. Reclassification follows the same EP Delta and non-destructive preservation discipline as any other correction.

### Correction Authority Matrix:

| Correction Type   | Authorized Corrector   | Approval Requirement  | Evidence  |
|---|--|---|---|
| Factual error in custody event record (wrong timestamp, incorrect quantity) | Operating entity that generated the original record          | Dual authorization (originator + supervisor)                              | Correction EP Delta with error description and supporting evidence          |
| Product reference correction (CPO error, wrong batch/lot linkage)           | Manufacturer or authoritative product registry               | Governance approval; higher scrutiny due to provenance chain implications | Correction EP Delta; provenance manifest update; downstream re-verification |
| Authorization correction (scope error, issuer reference error)              | Issuing authority or institutional governance                | Governance approval; downstream dispensation review if already dispensed  | Correction EP Delta; affected dispensation event inventory                  |
| Safety evidence correction (incorrect classification, erroneous alert)      | Evidence source system operator with clinical/quality review | Clinical or quality review plus governance documentation                  | Correction EP Delta; affected decision state review                         |
| Recall scope correction   | Recall authority   | Governance  | Recall scope correction   |

| Correction Type                                   | Authorized Corrector | Approval Requirement                                   | Evidence  |
|---|----------------------|--|---|
| (over-inclusive or under-inclusive initial scope) |                      | documentation; downstream notification of scope change | record; updated notification to custody holders |

## 8.4 Supersession Chains and Current-Reference State Determination

When an evidence artifact, authorization, product state, or safety assessment is replaced by a newer version, the framework maintains a supersession chain linking all versions in chronological order.

### Supersession Chain Structure:

supersession\_chain:

chain\_id: [content\_address]

subject\_type: AUTHORIZATION | PRODUCT\_STATE | SAFETY\_EVIDENCE | CPO

subject\_reference: [content\_address of subject]

versions:

- version\_number: 1
  - state: SUPERSEDED
  - content\_address: [hash of version 1]
  - created\_at: [UTC]
  - superseded\_at: [UTC]
  - superseded\_by: [hash of version 2]
- version\_number: 2
  - state: SUPERSEDED
  - content\_address: [hash of version 2]
  - created\_at: [UTC]
  - superseded\_at: [UTC]
  - superseded\_by: [hash of version 3]
- version\_number: 3
  - state: CURRENT
  - content\_address: [hash of version 3]
  - created\_at: [UTC]

current\_reference: [hash of version 3]

chain\_content\_address: [self-referential hash]

### Current-Reference State Determination Rules:

- The current-reference state is always the most recent version in the supersession chain that has not been revoked.

- If the most recent version has been revoked, the current-reference state is REVOKED — the framework does not automatically fall back to a prior version. Re-authorization or re-assessment is required.
- Downstream actions must bind to the current-reference state. Actions bound to a superseded version generate reconciliation breaks.
- Supersession chain traversal is available to reviewers at the appropriate tier, enabling version history reconstruction.

---

## 8.5 Non-Destructive Preservation of Prior States

Every state change — correction, supersession, revocation, recall, reclassification — preserves the prior state in its original, unmodified form. This principle is foundational and non-negotiable within the framework.

### Preservation Mechanisms:

| Change Type        | Prior State Treatment   | Retrieval Method   |
|--------------------|---|--|
| Correction         | Original record retained with CORRECTED status; linked to correction EP Delta | Retrieve by original content address; correction EP Delta contains pointer to both versions              |
| Supersession       | Prior version retained with SUPERSEDED status; linked via supersession chain  | Traverse supersession chain; prior versions accessible by version number or content address              |
| Revocation         | Revoked artifact retained with REVOKED status; revocation record linked       | Retrieve by content address; revocation record provides context  |
| Recall             | Pre-recall product state and custody evidence preserved                       | Retrieve complete custody chain including pre-recall events; recall events are additive, not overwriting |
| Hold/release cycle | Pre-hold state, hold record, and post-release state all preserved             | Full hold lifecycle available: trigger → hold entry → investigation → resolution → release               |

### Prohibited Actions:

- Deletion of evidence artifacts from content-addressed storage during retention period.
- Modification of content-addressed artifacts after storage (modification creates a new content address, breaking linkage).
- Silent overwrite of any state without generating a correction EP Delta or supersession record.
- Selective purging of historical versions from supersession chains.

Any detected violation of these preservation rules is treated as a governance violation, logged as a liability trigger event per Baseline C conventions, and subject to incident investigation.

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## 8.6 Dispute-Handling and Post-Resolution Review

Disputes arise when parties disagree about the evidence state of a product, authorization, custody record, or safety assessment. The framework provides structured dispute-handling that produces evidence artifacts and preserves all parties' positions.

### Dispute Workflow:

#### Step 1: Dispute initiation

- Disputing party submits dispute record with:
  - subject reference, nature of dispute, claimed evidence state, supporting documentation
- ILS record generated; hold-only containment applied to disputed subject

#### Step 2: Counter-evidence gathering

- Responding party(ies) submit their evidence artifacts
- All submissions content-addressed and preserved

#### Step 3: Reconciliation attempt

- Framework's reconciliation logic applied to identify specific evidence discrepancy
- Break classification per Section 9.6

#### Step 4: Determination

- Determination authority (institutional governance, designated arbitrator, or regulatory authority as applicable) reviews evidence from all parties
- Determination record generated with authority, reasoning, and evidence references

#### Step 5: Resolution execution

- Correction, supersession, or confirmation applied per determination
- EP Delta generated
- Hold released with resolution evidence

#### Step 6: Post-resolution review

- All dispute evidence, determination records, and resolution artifacts compiled into a Preservation Bundle

- Post-resolution review conducted to identify process improvements
- Lessons learned documented per governance framework

**Dispute Evidence Preservation.** All dispute-related evidence — initiation records, counter-evidence submissions, reconciliation analysis, determination records, and resolution artifacts — is preserved as a Preservation Bundle per Baseline C conventions. The bundle is available for Tier 1 reviewer access under documented purpose code and TTL.

## 8.7 Downstream Propagation and Closure Conditions

When a correction, recall, revocation, or supersession event affects upstream evidence, the framework requires propagation assessment to identify and address downstream actions that relied on the now-changed evidence state.

### Downstream Propagation Logic:

| Upstream Change                      | Downstream Actions Affected   | Propagation Requirement  | Closure Condition  |
|--------------------------------------|---|--|--|
| Product recalled (batch/lot level)   | All dispensation events for affected batch/lot; all pending claims linked to affected products                | Notification to all dispensation points; claim hold for affected products; patient notification per institutional policy | All affected units accounted for (returned, destroyed, or assessed); all affected claims adjusted or resolved                  |
| Authorization revoked                | All pending dispensation events linked to revoked authorization; all claims referencing revoked authorization | Dispensation hold; claim hold; re-authorization required for continuation  | All pending dispensations either re-authorized or cancelled; all claims adjusted   |
| Safety evidence superseded           | All future dispensation events for affected product; open prescriptions referencing stale safety evidence     | Evidence refresh required before next dispensation; prescriber notification if safety profile materially changed         | All affected prescriptions re-assessed; all future dispensation events operating on current evidence                           |
| Custody integrity failure detected   | All products in affected custody chain segment; all downstream dispensation and claim events                  | Hold-only containment on affected products; investigation of custody chain; downstream event review                      | Investigation concluded with determination; affected products re-verified or quarantined; custody chain repaired or documented |
| Correction to product identity (CPO) | All evidence artifacts referencing corrected CPO  | Provenance manifest update; downstream evidence re-linkage to corrected CPO  | All evidence artifacts verified against corrected CPO; reconciliation confirms alignment                                       |

**Closure Documentation.** Each propagation event is tracked until closure. Closure requires: confirmation that all affected downstream actions have been identified, notification sent to affected parties, appropriate holds or adjustments applied, and resolution evidence documented. The propagation tracking record, including closure evidence, is preserved as part of the correction, recall, or supersession Preservation Bundle.

**Incomplete Propagation.** If propagation cannot reach all affected downstream actions within the governance SLA (e.g., a recalled product has been dispensed and the dispensation point cannot locate the recipient), the framework does not treat this as a resolution — it maintains the propagation item as an open break in the open breaks register (adapted from Baseline E, Section 10.2), subject to escalation and continued monitoring.

## 9. Evidence Artifacts, Manifests, Reconciliation, and Preservation

### 9.1 Evidence Pack Architecture for Authenticity, Provenance, Authorization, Custody, and Proof-of-Safety States

Every operational state defined in Section 3 — product authenticity, provenance, issuer legitimacy, prescription validity, chain-of-custody, dispensation, proof-of-safety, recall/hold, correction/supersession, and optional claim/reimbursement — is backed by a structured evidence pack. Evidence packs follow the architecture established in Baseline C's Evidence Pack Manifest Template, adapted for healthcare state categories.

#### Evidence Pack Taxonomy for Healthcare States:

| Evidence Pack Type                | Abbreviation | Contents  | Baseline Analog                               |
|-----------------------------------|--------------|---|---|
| Product Authenticity Evidence Set | PAES         | CPO, manufacturer credential reference, batch/lot release records, provenance manifest, integrity verification results                            | Ownership Evidence Set (OES) — Baseline A     |
| Authorization Evidence Set        | AES          | Issuer credential reference, scope attestation, currency check, revocation check result, freshness status   | Disclosure Evidence Pack (DEP) — Baseline A   |
| Custody Evidence Set              | CES          | Custody event chain (all CUS_ events), storage condition logs, handoff confirmations, excursion records   | Custody Evidence Pack (CEP) — Baseline B      |
| Safety Evidence Set               | SES          | Product-level evidence classes (PS-01 through PS-05), decision-level evidence classes (DS-01 through DS-05), context-bound decision state records | Surveillance Evidence Pack (SEP) — Baseline C |
| Dispensation Evidence Pack        | DEP-H        | Dispensation precondition gate results, dispensation event record, authorization linkage, recipient reference, product verification               | Settlement Evidence Pack — Baseline E         |
| Preservation Bundle               | PB           | Incident-specific evidence collection: break detection records, investigation logs, resolution evidence, post-review documentation                | Preservation Bundle (PB) — Baseline C         |

**Evidence Pack Manifest Structure.** Each evidence pack includes a manifest — a content-addressed index of all artifacts within the pack. The manifest follows Baseline C's manifest schema:

```
evidence_pack_manifest:
```

```

pack_id: [content_address]
pack_type: PAES | AES | CES | SES | DEP-H | PB
subject_reference: [CPO content_address or authorization ID or
                    custody chain ID]
generation_timestamp: [UTC]
generating_entity: [pseudonymized or role-based ID]
period_start: [UTC]
period_end: [UTC]
artifact_inventory:
  - artifact_id: [content_address]
    artifact_type: [ILS | EP_Delta | condition_log | credential_ref | ...]
    artifact_timestamp: [UTC]
  - ...
completeness_checklist:
  required_elements_present: [boolean per element]
  gaps_documented: [list of missing elements with reason codes]
integrity_verification:
  method: SHA-256
  manifest_content_address: [self-referential hash]
  chain_verification_result: PASS | FAIL
retention_metadata:
  retention_class: [class identifier]
  retention_period: [alignment objective: 7+ years]
  legal_hold_status: [boolean]

```

**Cross-Pack Linkage.** Evidence packs do not exist in isolation. A dispensation evidence pack (DEP-H) references the PAES for the dispensed product, the AES for the authorizing prescription, the CES for the custody chain, and the SES for the safety evidence. These cross-references are maintained through content-addressed pointers — each pack's manifest contains the content addresses of the related packs. A reviewer can traverse from any evidence pack to all related packs by following the content-addressed references.

---

## 9.2 Minimum Logging Taxonomy

All operational events within the framework are logged using a standardized event taxonomy aligned with Baseline C's minimum logging taxonomy. Healthcare-specific event categories extend the baseline taxonomy without modifying it.

### Healthcare Event Categories (Extending Baseline C):

| Event Category         | Event Types   | Description   |
|------------------------|---|---|
| Product events         | PRODUCT_REGISTERED, PRODUCT_VERIFIED, PRODUCT_FAILED, PRODUCT_RECALLED, PRODUCT_WITHDRAWN   | Product lifecycle events from CPO registration through recall or withdrawal |
| Authorization events   | AUTH_ISSUED, AUTH_RENEWED, AUTH_EXPIRED, AUTH_REVOKED, AUTH_SUSPENDED, AUTH_SUPERSEDED  | Prescription and authorization lifecycle events                             |
| Custody events         | CUS_RECEIPT, CUS_HANDOFF, CUS_STORAGE_ENTRY, CUS_STORAGE_EXIT, CUS_TEMP_EXCURSION, CUS_REPACKAGE, CUS_QUARANTINE_ENTRY, CUS_QUARANTINE_RELEASE, CUS_DISPENSATION, CUS_RETURN, CUS_DESTRUCTION, CUS_RECALL_ACK, CUS_HOLD_ENTRY, CUS_HOLD_RELEASE | Full custody event taxonomy per Section 6.1                                 |
| Safety evidence events | SAFETY_ASSESSED, SAFETY_SUPERSEDED, SAFETY_ALERT_GENERATED, SAFETY_ALERT_OVERRIDDEN, SAFETY_EVIDENCE_REFRESHED  | Safety evidence lifecycle events per Section 7                              |
| Reconciliation events  | RECON_EXECUTED, RECON_BREAK_DETECTED, RECON_BREAK_RESOLVED, RECON_ALIGNED   | Reconciliation execution and break lifecycle                                |
| Reviewer access events | TIER0_ACCESS, TIER1_ACCESS, TIER2_ACCESS, ACCESS_EXPIRED, POST_ACCESS_REVIEW  | Tiered reviewer access events per Section 10                                |
| Governance events      | GOVERNANCE_APPROVAL, CHANGE_CONTROL, RECERT_TRIGGERED, MATERIAL_CHANGE, LIABILITY_TRIGGER   | Governance lifecycle events per Section 11                                  |

**Minimum Event Attributes.** Every logged event must include the fields specified in Baseline C's logging schema: unique event identifier, UTC timestamp (millisecond precision, authoritative time source), event type from the taxonomy above, actor identifier (pseudonymized or role-based), affected resource identifier (product CPO, authorization ID, custody chain reference), event outcome (success, failure, pending), severity (info, low, medium, high, critical), integrity hash (content address of this event record), previous event hash (for hash chain continuity), redaction flag (boolean indicating PII minimization applied), and retention class.

### 9.3 Content-Addressed Manifest Patterns

All evidence artifacts — ILS records, evidence pack manifests, EP Deltas, provenance manifests, condition logs, decision state records — are stored using content-addressed storage per Baseline C conventions. Content addressing means that each artifact is stored and retrieved using the cryptographic hash of its content as the identifier.

#### Content-Addressing Operating Rules:

1. **Immutability by construction.** A content-addressed artifact cannot be modified after storage without generating a new content address — which would break all references to the original artifact.
2. **Tamper detection by verification.** To verify an artifact's integrity, a reviewer computes its content hash and compares it to the stored content address. A mismatch indicates tampering or corruption.
3. **Deduplication.** Identical artifacts produce identical content addresses, enabling efficient storage.
4. **Linkage integrity.** Evidence packs reference artifacts by content address. If an artifact is replaced (correction, supersession), the reference in the evidence pack manifest changes — and the change itself is logged as an EP Delta.

### Manifest Patterns for Healthcare Evidence:

| Manifest Type            | Contents Indexed   | Update Trigger                                  | Integrity Check   |
|--------------------------|--|---|---|
| Provenance manifest      | All provenance events for a product unit/aggregation                       | Each custody transition event                   | Hash chain verification across all events                         |
| Authorization manifest   | All authorization lifecycle events for a prescription                      | Each authorization state change                 | Hash chain verification; supersession chain integrity             |
| Custody manifest         | All custody events for a product unit                                      | Each custody event                              | Hash chain verification; cross-reference to provenance manifest   |
| Safety evidence manifest | All safety evidence artifacts for a product-decision combination           | Each safety evidence generation or supersession | Content-address verification of all referenced evidence classes   |
| Reconciliation manifest  | All reconciliation execution records and break reports for a defined scope | Each reconciliation execution                   | Hash chain across reconciliation cycles; break resolution linkage |

## 9.4 Chain-of-Custody for Product Evidence and Decision-State Evidence

Evidence artifacts themselves — not only physical products — require chain-of-custody documentation. The chain-of-custody for evidence artifacts documents every access, modification, transfer, and submission event from artifact creation through final archival.

### Evidence Chain-of-Custody — Required Fields Per Event:

| Field         | Description   |
|---------------|---|
| action_type   | creation, access, review, export, transfer, submission, archival                    |
| timestamp     | UTC timestamp with millisecond precision  |
| actor_id      | Pseudonymized or role-based identifier of the entity performing the action          |
| location      | System, facility, or storage layer where the action occurred                        |
| justification | Purpose code per Baseline C/D conventions; documented reason for the action         |
| verification  | Content-address verification result at time of action (confirms artifact integrity) |

**Evidence Chain-of-Custody vs. Product Chain-of-Custody.** The framework maintains two parallel chains: the product custody chain (Section 6) documenting the physical product's custodial journey, and the evidence custody chain documenting the evidence artifacts' access and handling

history. Both chains are content-addressed and hash-chained. The evidence custody chain is essential for examiner confidence: a reviewer must be able to confirm that the evidence artifacts presented during a review have not been altered since their creation.

## 9.5 Reconciliation Cadence Design

Reconciliation is the continuous or periodic process of verifying alignment between related evidence states — provenance records and custody records, authorization records and dispensation records, safety evidence and current safety data sources, and claim records and underlying dispensation evidence. Reconciliation cadences are calibrated to the volatility and criticality of the evidence states being reconciled.

### Reconciliation Cadence Matrix:

| Reconciliation Type                  | Scope  | Default Cadence   | Event-Driven Triggers  |
|--------------------------------------|--|---|--|
| Provenance-Custody Alignment         | Provenance manifest vs. custody event chain for each product   | Continuous (real-time alerts for critical breaks); daily batch for comprehensive check              | Every custody transition event (CUS_HANDOFF, CUS_RECEIPT, CUS_REPACKAGE)             |
| Authorization-Dispensation Alignment | Authorization validity state vs. dispensation events referencing the authorization                                 | At each dispensation event; daily batch for open prescriptions                                      | Dispensation event; authorization state change (renewal, revocation, supersession)   |
| Safety Evidence Currency             | Safety evidence classes vs. current source data versions (formulary, interaction database, product safety profile) | Per institutional governance cadence (alignment objective: at least daily for high-risk categories) | Source data update notification; product safety communication; formulary change      |
| Claim-Evidence Alignment (Optional)  | Claim/reimbursement records vs. underlying dispensation, authorization, and product evidence                       | At claim submission; at adjudication; periodic audit cycle  | Claim submission; upstream evidence correction or revocation                         |
| Aggregate Holdings Reconciliation    | Total product units in custody chain vs. manufacturer release records and recall scope determinations              | Weekly batch; event-driven for recalls  | Recall notification; manufacturer production correction; aggregate discrepancy alert |
| Offboarding Reconciliation           | Framework evidence vs. legacy system records at transition point   | At offboarding initiation; at offboarding completion; post-offboarding                              | Offboarding trigger event  |

| Reconciliation Type | Scope | Default Cadence | Event-Driven Triggers |
|---------------------|-------|-----------------|-----------------------|
|                     |       | verification    |                       |

**Reconciliation Execution Record.** Each reconciliation execution generates a content-addressed report containing: the reconciliation type and scope, the data sources compared, the execution timestamp, the result (ALIGNED or BREAK\_DETECTED with break details), and a hash pointer to the previous reconciliation report for the same scope (forming a reconciliation chain).

## 9.6 Break Taxonomy and Severity Bands

A reconciliation break is a detected mismatch between evidence states that should be aligned. Breaks are classified by type (what kind of mismatch) and severity (operational impact and required response).

### Break Type Taxonomy:

| Break Type | Description  | Example   |
|------------|--|---|
| BRK-PROV   | Provenance break — mismatch between provenance manifest and custody records                                      | Custody chain shows handoff to Entity B, but provenance manifest has no corresponding event         |
| BRK-AUTH   | Authorization break — mismatch between authorization state and dispensation or claim records                     | Dispensation references an authorization that has transitioned to EXPIRED or REVOKED                |
| BRK-CUST   | Custody break — mismatch between custody records and expected custody state                                      | Product unit recorded at Facility A but receipt record shows Facility B without intervening handoff |
| BRK-SAFE   | Safety evidence break — mismatch between required safety evidence and available evidence                         | Required evidence class DS-01 (contraindication screening) absent for a completed dispensation      |
| BRK-CLAIM  | Claim break — mismatch between claim/reimbursement records and underlying dispensation or authorization evidence | Claim references a dispensation event whose authorization has been subsequently revoked             |
| BRK-INTEG  | Integrity break — content-address verification failure for any evidence artifact                                 | Hash of retrieved artifact does not match the stored content address                                |
| BRK-FRESH  | Freshness break — evidence artifact exceeds applicable freshness window  | Issuer legitimacy check performed 45 days ago; freshness window for authority type is 30 days       |

### Severity Bands:

| Severity        | Definition   | Default Response   | Resolution SLA  |
|-----------------|--|--|---|
| SEV-1: Critical | Break indicates potential safety risk, counterfeit, unauthorized access, or integrity compromise                   | Immediate hold-only containment; incident escalation; Preservation Bundle  | Resolution within 4 hours (containment); full investigation within 48 hours |
| SEV-2: High     | Break indicates material evidence gap or stale evidence that could affect dispensation, claim, or review decisions | Hold-only containment on affected downstream actions; Tier 1 investigation | Resolution within 24 hours  |

| Severity           | Definition  | Default Response  | Resolution SLA                    |
|--------------------|---|---|-----------------------------------|
| SEV-3:<br>Moderate | Break indicates evidence inconsistency that does not directly affect current safety or dispensation but requires correction | Investigation initiated; no hold unless escalation conditions met | Resolution within 5 business days |
| SEV-4: Low         | Break indicates minor discrepancy (rounding, timestamp precision, non-material metadata)                                    | Logged for correction during next reconciliation cycle            | Resolution within 30 days         |

**Break Lifecycle.** Each break follows a defined lifecycle: DETECTED → INVESTIGATED → CONTAINED (if applicable) → RESOLVED → CLOSED. Each transition generates an ILS record. A break is CLOSED only when the resolution evidence has been verified and the reconciliation re-execution confirms alignment.

## 9.7 Preservation Bundles and Legal-Hold-Ready Records

Preservation bundles are comprehensive evidence collections assembled for incidents, disputes, recalls, investigations, or legal hold requirements. The preservation bundle concept is inherited from Baseline C without modification.

### Preservation Bundle Trigger Events:

| Trigger                                 | Bundle Scope   | Mandatory Contents   |
|---|--|--|
| SEV-1 or SEV-2 reconciliation break     | All evidence related to the break: affected product, authorization, custody, and safety evidence | Break detection record, investigation logs, containment evidence, resolution documentation, post-review record           |
| Product recall                          | All evidence for recalled product batch/lot across all custody holders                           | Recall notification, scope determination, acknowledgment records, quarantine/return/destruction evidence, closure report |
| Safety incident or adverse event report | All evidence for the product, authorization, dispensation, and safety assessment involved        | Product PAES, authorization AES, custody CES, safety SES, dispensation DEP-H, decision state records                     |
| Tier 2 reviewer access event            | All evidence accessed during Tier 2 investigation plus the access control records                | Tier 2 access request, approval records, accessed evidence inventory, findings, post-access review                       |
| Dispute between parties                 | All evidence submitted by all parties plus reconciliation analysis and determination records     | Dispute initiation record, counter-evidence, reconciliation analysis, determination, resolution EP Delta                 |
| Legal hold instruction                  | All evidence within the scope of the legal hold instruction                                      | Scope determination, hold activation record, affected evidence inventory, hold monitoring records                        |
| Offboarding event                       | Complete evidence set for transitioning product, authorization, or custody scope                 | Final reconciliation, evidence snapshots, legacy transition manifest, ingestion verification                             |

**Legal-Hold Readiness.** All evidence artifacts are stored in a state that supports legal hold activation without data migration or format conversion. Legal hold activation adds a hold flag to the retention

metadata of affected artifacts, preventing destruction even if the standard retention period expires. Legal hold is removed only upon documented release authorization from the authority that initiated the hold.

---

## 9.8 Retrieval and Production Workflows

Evidence retrieval follows the tiered access model (Section 10) with purpose limitation, TTL constraints, and post-access review. Evidence production workflows convert stored evidence artifacts into examination-ready output packages.

### Retrieval Service Level Objectives (Alignment Objectives):

| Request Type  | Target Response Time                 | Format  |
|---|--------------------------------------|---|
| Standard examiner query (single product, single state category)         | Within 48 hours                      | Evidence pack with manifest, targeted artifacts, integrity verification                               |
| Comprehensive review (multiple products, cross-state-category)          | Within 5 business days               | Complete evidence pack with cross-referencing, reconciliation history, break inventory                |
| Emergency retrieval (safety incident, active recall, regulatory demand) | Within 4 hours                       | Priority evidence extraction with integrity verification; completeness may be validated post-delivery |
| Dispute-related production  | Within 48 hours per party's evidence | Structured evidence per dispute-handling framework (Section 8.6)                                      |

### Production Process:

1. **Request intake.** Purpose code assigned; TTL determined; access tier confirmed.
  2. **Scope determination.** Evidence artifacts within the request scope identified through manifest queries and content-addressed retrieval.
  3. **Integrity verification.** All retrieved artifacts verified against stored content addresses; any integrity failures flagged.
  4. **Minimization and redaction.** Per Baseline C's redaction protocol: PII minimized; prohibited data elements redacted; pseudonymization applied where Tier 1 access; full identifiers included only for Tier 2 access.
  5. **Assembly.** Evidence artifacts assembled into the evidence pack folder structure per Baseline C's standard folder structure, with manifest, checksums, and chain-of-custody documentation.
  6. **Attestation.** Responsible officer attests to completeness and accuracy of the production.
  7. **Delivery.** Pack transmitted through secure channels with delivery confirmation logged.
  8. **Post-production documentation.** Production event logged as ILS; access recorded in evidence chain-of-custody.
-

## 9.9 Examiner / Reviewer Replay Requirements

Reviewers must be able to reconstruct the operational state of any product, authorization, custody chain, dispensation event, or safety assessment at any historical point. This replay capability is the healthcare analog of "ownership timeline replay" from Baseline A and "settlement chain reconstruction" from Baseline E.

### Replay Capability Requirements:

| Replay Type                   | Input                                    | Output   | Evidence Traversal   |
|-------------------------------|--|--|--|
| Product authenticity replay   | Product CPO reference + target timestamp | Authenticity state at target timestamp with supporting evidence  | PAES → provenance manifest → custody chain at timestamp                                |
| Authorization timeline replay | Authorization ID + time range            | Complete authorization lifecycle within time range   | AES → all EP Deltas → supersession chain → dependent dispensation events               |
| Custody chain replay          | Product reference + time range           | Complete custody event chain within time range with condition records  | CES → ordered custody events → storage condition logs → excursion records              |
| Dispensation reconstruction   | Dispensation event ID                    | Complete dispensation evidence: all gate results, authorization linkage, product verification, safety evidence | DEP-H → PAES + AES + CES + SES cross-references  |
| Safety decision replay        | Decision state ID                        | Context-bound decision state with all referenced evidence classes, algorithm versions, and input parameters    | SES → decision state record → evidence class artifacts → algorithm version snapshots   |
| Recall scope replay           | Recall ID                                | Complete recall lifecycle: scope determination, downstream propagation, acknowledgment tracking, closure       | Recall PB → affected product inventory → custody holder responses → resolution records |

## 9.10 Evidence Integrity Failure and Recovery Posture

When evidence integrity checks fail — a content-addressed artifact's hash does not match, a hash chain break is detected, or an artifact is unavailable in storage — the framework treats the failure as a governance incident requiring investigation and recovery.

### Evidence Integrity Failure Response:

Step 1: Detection and containment

- Integrity failure detected through hash verification or retrieval failure
- Affected evidence artifacts flagged; dependent operational states placed under hold-only containment
- ILS record: BRK-INTEG with severity assessment

## Step 2: Investigation

- Root cause analysis: data corruption, unauthorized modification, storage failure, replication lag, or deliberate tampering
- Investigation logged as ILS records

## Step 3: Recovery

- Valid version restored from replicated storage or backup
- Restored artifact integrity verified
- If no valid version exists: evidence gap documented; affected operational states re-assessed based on remaining evidence

## Step 4: Post-incident review

- Preservation Bundle generated capturing failure evidence and recovery documentation
- Governance review of integrity controls; recertification trigger evaluation per Section 11.4
- Lessons learned documented

**Unrecoverable Evidence Loss.** If an evidence artifact cannot be recovered from any storage replica or backup, the loss is documented as a permanent evidence gap. Operational states that relied on the lost artifact are re-assessed using remaining evidence. If remaining evidence is insufficient to sustain the operational state (e.g., a VERIFIED authenticity state depends on a lost provenance manifest), the state transitions to UNRESOLVED and hold-only containment applies.

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# 10. Tiered Reviewer, Institutional, and Examiner Access

## 10.1 Tier Definitions

The tiered access model is inherited from Baselines B, C, and D without modification to the tier structure. This section applies the three-tier model to healthcare evidence categories.

### **Tier 0 — Aggregate / Statistical Access (Default):**

Produces aggregate statistics, compliance rates, coverage percentages, and market-level summaries without identifying specific products, prescriptions, patients, or practitioners. Tier 0 is the default access level for all reviewer interactions.

Healthcare Tier 0 outputs include: product authenticity verification pass rates across a participant population, authorization validity check compliance percentages, custody chain integrity rates, dispensation precondition gate pass/fail distributions, safety evidence coverage statistics, reconciliation break counts by type and severity, and recall response completion percentages.

Tier 0 explicitly excludes: individual product provenance details, specific prescription or authorization records, patient-identifiable dispensation records, practitioner-identifiable authorization records, and individual clinical decision state records.

**Tier 1 — Scoped / Event-Triggered Access:**

Produces scoped evidence extracts for specific products, authorizations, custody chains, or dispensation events under documented purpose codes and TTL constraints. Tier 1 is triggered by specific events (reconciliation breaks, safety alerts, recall investigations, examination requests) and provides pseudonymized references rather than full identity details.

Healthcare Tier 1 outputs include: product provenance manifests for identified products (referenced by CPO, not by patient), authorization lifecycle records for identified prescriptions (referenced by authorization ID, not by patient or prescriber name), custody event chains for identified products, safety evidence artifacts for identified decisions (with practitioner and patient pseudonymized), and reconciliation break investigation records.

**Tier 2 — Exceptional Reveal:**

Access to underlying identity details — prescriber identity, patient identity, manufacturer identity, specific institutional arrangements — under objective triggers, dual-control approval, strict TTL (default 48-hour initial window), and mandatory post-access review. Tier 2 is reserved for circumstances where Tier 1 evidence is insufficient to resolve the investigation.

Healthcare Tier 2 triggers include: confirmed or suspected counterfeit product detection, practitioner authority fraud investigation, patient safety incident requiring full identity for notification, regulatory enforcement action, and legal hold or litigation discovery requiring full record access.

**10.2 Purpose Limitation and TTL**

Every reviewer access event — at any tier — operates under purpose limitation and TTL constraints inherited from Baselines C and D.

**Purpose Limitation.** Each access request specifies a purpose code drawn from a defined purpose code registry. Evidence accessed under a purpose code may not be used for functions outside that code without a new access request and approval cycle.

**Healthcare Purpose Code Registry (Illustrative):**

| Purpose Code        | Description  | Typical Tier   | Default TTL        |
|---------------------|--|----------------|--------------------|
| PUR-EXAM-ROUTINE    | Routine examination or audit of operational controls | Tier 0, Tier 1 | 30 days            |
| PUR-RECON-BREAK     | Investigation of specific reconciliation break       | Tier 1         | 14 days            |
| PUR-SAFETY-INCIDENT | Investigation of safety incident or adverse event    | Tier 1, Tier 2 | 30 days            |
| PUR-RECALL-SCOPE    | Recall scope determination and                       | Tier 1         | Duration of recall |

| Purpose Code    | Description                           | Typical Tier   | Default TTL                            |
|-----------------|---------------------------------------|----------------|--|
|                 | tracking                              |                | lifecycle                              |
| PUR-DISPUTE     | Dispute investigation between parties | Tier 1         | Duration of dispute lifecycle          |
| PUR-ENFORCEMENT | Regulatory enforcement investigation  | Tier 1, Tier 2 | Per regulatory authority determination |
| PUR-LEGAL-HOLD  | Legal hold or litigation discovery    | Tier 1, Tier 2 | Duration of legal hold                 |
| PUR-COUNTERFEIT | Counterfeit investigation             | Tier 1, Tier 2 | 90 days (renewable)                    |

**TTL Operating Rules.** Access privileges expire automatically at TTL termination. Expired access cannot be renewed by extending the original grant; a new access request with updated justification is required. TTL expiration events are logged. Evidence accessed during the TTL window remains available for the purpose of documenting findings; the TTL constrains ongoing access, not the use of findings already obtained.

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### 10.3 Default Reviewer-Safe Outputs

By default, all reviewer queries produce reviewer-safe outputs — evidence extracts that provide sufficient information for the review purpose without exposing unnecessary detail. The reviewer-safe output concept is inherited from Baseline D's Verifier Output Pack (VOP) conventions.

**Reviewer-Safe Output Principles:**

- Product evidence: Reviewer receives product category, batch/lot reference, authenticity state, provenance chain status, and custody chain status. Raw manufacturer commercial details, pricing, and supply chain partner identities are excluded unless Tier 2 access is authorized.
- Authorization evidence: Reviewer receives authorization type, scope, validity state, and issuer legitimacy state. Prescriber name, license number, and practice address are pseudonymized at Tier 1 and revealed only at Tier 2.
- Dispensation evidence: Reviewer receives dispensation event metadata, gate results, and product/authorization linkage. Patient identity is excluded at Tier 0 and Tier 1; pseudonymized at Tier 1 when event-specific investigation requires it; revealed only at Tier 2 under objective triggers.
- Safety evidence: Reviewer receives evidence class presence/absence, freshness status, and override flags. Clinical decision inputs (patient parameters, clinical notes) are abstracted at Tier 1 and accessible only at Tier 2.

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### 10.4 Elevated Access Conditions

Tier 1 access is granted when a documented trigger event justifies scoped access beyond Tier 0 aggregate outputs. Tier 2 access requires additional safeguards.

**Tier 1 Elevation Requirements:**

| Requirement          | Detail   |
|----------------------|--|
| Documented trigger   | Specific event justifying access (break detection, safety alert, recall, examination request) referenced by event ID |
| Purpose code         | Selected from the purpose code registry; constrains downstream use of accessed evidence                              |
| Scope definition     | Specific products, authorizations, time windows, or custody chains included; no open-ended scope                     |
| TTL assignment       | Maximum access duration assigned; auto-expiry enforced   |
| Requesting authority | Identity and institutional affiliation of the requesting reviewer documented   |
| Approval             | Single-approval pathway (supervisor or designated access approver)   |

**Tier 2 Elevation Requirements (All Tier 1 Requirements Plus):**

| Requirement                   | Detail   |
|-------------------------------|--|
| Objective trigger             | Trigger must meet predefined objective criteria (e.g., confirmed counterfeit indicator, patient safety notification requirement, enforcement referral) — not subjective assessment |
| Dual-control approval         | Two independent approvers required; neither may be the requesting reviewer   |
| Strict TTL                    | Default 48-hour initial window; renewable in 48-hour increments with documented re-justification   |
| Scope minimization            | Access limited to the minimum evidence necessary to address the objective trigger  |
| Post-access review commitment | Mandatory post-access review within defined SLA (default: 5 business days after access termination)  |
| Participant notification plan | Plan for notifying affected parties after investigation, unless notification would compromise ongoing enforcement  |

## 10.5 Emergency / Dispute Escalation Access

Emergency access addresses situations requiring immediate evidence access to protect patient safety, contain active counterfeit threats, or respond to regulatory emergencies.

**Emergency Access Procedure:**

1. **Emergency declaration.** Declaring authority identifies the emergency condition and documents the nature of the threat.
2. **Expedited Tier 2 approval.** Dual-control approval obtained on an expedited basis (target: within 2 hours). If one approver is unavailable, a designated alternate approver substitutes with documented justification.
3. **Immediate access granted.** Access activated with strict TTL (24-hour initial window for emergencies; renewable).
4. **Concurrent documentation.** Full access request documentation completed within 24 hours of access activation (post-hoc documentation is permitted for genuine emergencies, not for convenience).
5. **Post-access review.** Mandatory post-access review initiated within 48 hours of access termination; completed within 5 business days.

**Dispute Escalation Access.** When a dispute between parties (Section 8.6) cannot be resolved at Tier 1, the determination authority may escalate to Tier 2 to access identity-level evidence. Dispute-related Tier 2 access follows standard Tier 2 requirements with the additional constraint that both disputing parties are notified of the escalation.

## 10.6 Post-Access Review

Every Tier 2 access event and selected Tier 1 access events (per institutional governance policy) require a formal post-access review. The post-access review is inherited from Baselines C and D and constitutes a mandatory accountability control.

### Post-Access Review Pack (PARP) — Required Contents:

| Element                         | Description   |
|---------------------------------|---|
| Access event reference          | Event ID of the Tier 1 or Tier 2 access event being reviewed  |
| Reviewer identity               | Identity of the post-access reviewer (must be independent of the original accessing reviewer)                                 |
| Access scope verification       | Confirmation that the accessing reviewer stayed within the approved scope; documentation of any scope deviations              |
| Findings summary                | Summary of what was found during the access period; findings that support or do not support the initial trigger justification |
| Data handling confirmation      | Confirmation that accessed evidence was handled per minimization, confidentiality, and purpose limitation requirements        |
| Follow-up actions               | Any follow-up actions required (additional investigation, referral, remediation, participant notification)                    |
| Participant notification status | Whether affected parties were notified; if not, documented justification for deferred notification                            |
| Review timestamp                | UTC timestamp of review completion  |
| PARP content address            | Self-referential hash for tamper-evident preservation   |

**Post-Access Review SLA.** Post-access review must be completed within 5 business days of access termination. Overdue reviews generate compliance alerts per the governance escalation framework (Section 11.7). Incomplete post-access reviews are treated as governance violations and logged as liability trigger events.

## 10.7 Minimization, Redaction, and Bounded Disclosure Discipline

Evidence access at every tier follows the minimization and redaction protocols established in Baseline C, applied to healthcare evidence categories.

### Minimization Hierarchy:

1. **Tier 0:** All evidence aggregated and anonymized. No individual product, prescription, patient, or practitioner identifiable.

2. **Tier 1:** Evidence scoped to specific subjects. Products identified by CPO reference. Practitioners and patients pseudonymized. Commercial terms and pricing redacted. Clinical detail abstracted to evidence class presence/absence and status.
3. **Tier 2:** Full evidence access within approved scope. Practitioner and patient identity may be revealed where the objective trigger requires it. Commercial terms and clinical detail accessible where the investigation scope includes them.

**Redaction for Evidence Pack Export.** When evidence packs are exported for examination or dispute proceedings, automated redaction scans for prohibited data elements (per Baseline C's redaction protocol) and replaces them with redaction tokens. A redaction log documents what was redacted, when, by whom, and under what justification. The redaction log is included in the evidence pack as a separate artifact.

## 10.8 Optional Proof-Based Verification Where It Materially Improves Bounded Access

Where Baseline D's programmable privacy patterns are applied, proof-carrying compliance artifacts may replace certain reviewer queries, reducing the need for even Tier 1 evidence access.

### Proof-Based Verification Applications:

| Reviewer Query                                       | Traditional Approach (Tier 1)  | Proof-Based Alternative   |
|--|--|---|
| "Is this product's authenticity verified?"           | Retrieve PAES; examine provenance manifest; verify manufacturer credential | Verifier Output Pack (VOP) confirming VERIFIED authenticity state; reviewer validates VOP without accessing raw provenance evidence |
| "Is the prescriber's authority current?"             | Retrieve AES; examine credential reference and revocation check            | VOP confirming issuer legitimacy CONFIRMED within freshness window; no credential detail exposed                                    |
| "Has the contraindication screening been performed?" | Retrieve SES; examine DS-01 evidence class                                 | VOP confirming DS-01 evidence class present and current; no patient or clinical detail exposed                                      |
| "Does this product have an active recall?"           | Retrieve product recall/hold state records                                 | VOP confirming ACTIVE state (no recall); no product-specific commercial or custody detail exposed                                   |

### Operating Constraints for Proof-Based Verification:

- Proof-based verification supplements but does not replace the tiered access model. If the VOP is insufficient to answer the reviewer's question, standard Tier 1 or Tier 2 access remains available.
- Every VOP is stored as an ILS record with content-addressed integrity, freshness timestamps, and revocation status references per Baseline D conventions.
- Stale or revoked VOPs trigger re-verification; reviewers may not rely on expired proof outputs.

# 11. Governance, Change Control, Recertification, and Accountability

## 11.1 Governance Structure and Role Taxonomy

The governance structure for this framework follows the patterns established in Baselines B and C: distributed governance with defined roles, no single-party override capability, clear accountability assignments, and examiner-accessible governance records.

### Governance Body Taxonomy (Adapted from Baseline B):

| Governance Body                 | Role   | Composition   | Decision Authority  |
|---------------------------------|--|---|---|
| Framework Steering Committee    | Strategic direction; standard approval; performance evaluation; escalated issue resolution                           | Institutional representatives, operational participants, independent experts, regulatory observers (non-voting) | Approve material changes to framework standards; evaluate performance; resolve escalated disputes   |
| Change Control Board            | Manage evolution of operational standards, evidence requirements, reconciliation cadences, and governance procedures | Technical experts from participating institutions and operational roles   | Approve or reject change requests; coordinate implementation; manage version control                |
| Incident Coordination Function  | Facilitate coordinated response to incidents affecting multiple participants or revealing systemic issues            | Rotating participation from operational entities; designated coordinator  | Coordinate investigation; aggregate information; facilitate communication; document lessons learned |
| Conformance Assessment Function | Oversee conformance testing, evidence quality review, and participant readiness validation                           | Assessment personnel with relevant expertise; independent of assessed entities                                  | Certification recommendations; deficiency identification; remediation oversight                     |

**No New Supervisory Bodies.** This framework does not create new regulatory authorities, supervisory bodies, or institutional oversight structures beyond those implied by the baseline governance patterns. The governance bodies listed above are operational coordination structures — not regulatory entities. Regulatory authority, supervisory jurisdiction, and institutional oversight remain with existing bodies.

## 11.2 RACI Slices for Critical Activities

RACI matrices define accountability for critical operational activities. The RACI conventions follow Baseline C's RACI matrix structure. Healthcare-specific RACI slices cover activities not addressed in securities-focused baselines.

### RACI Matrix — Product Authenticity and Provenance:

| Activity                               | Manufacturer | Distributor | Pharmacy/<br>Hospital        | Governance<br>Body | Examiner<br>Support |
|--|--------------|-------------|------------------------------|--------------------|---------------------|
| Generate CPO                           | R/A          | I           | I                            | I                  | I                   |
| Maintain provenance manifest           | R            | R           | R (at their custody segment) | I                  | C                   |
| Verify product authenticity at receipt | I            | R           | R                            | I                  | I                   |
| Detect provenance break                | C            | R           | R                            | I                  | C                   |
| Contain provenance break (hold-only)   | C            | R/A         | R/A                          | C                  | I                   |
| Resolve provenance break               | R            | R           | R                            | A                  | C                   |

**RACI Matrix — Authorization and Dispensation:**

| Activity                                 | Prescriber | Dispensing Entity | Institutional Governance    | Credentialing Body | Examiner Support |
|--|------------|-------------------|-----------------------------|--------------------|------------------|
| Issue authorization                      | R/A        | I                 | I                           | I                  | I                |
| Verify issuer legitimacy at dispensation | I          | R/A               | C                           | C                  | I                |
| Execute dispensation precondition gates  | I          | R/A               | I                           | I                  | I                |
| Detect authorization break               | I          | R                 | C                           | C                  | C                |
| Contain authorization break (hold-only)  | I          | R/A               | C                           | I                  | I                |
| Revoke authorization                     | R/A        | I                 | A (if governance-initiated) | C                  | I                |

**RACI Matrix — Recall and Correction:**

| Activity                      | Recall Authority | Custody Holders      | Governance Body | Examiner Support |
|-------------------------------|------------------|----------------------|-----------------|------------------|
| Initiate recall               | R/A              | I (notified)         | I               | I                |
| Acknowledge recall            | I                | R                    | I               | I                |
| Quarantine affected products  | I                | R/A                  | I               | I                |
| Track recall scope completion | R                | R (report inventory) | C               | C                |
| Close recall                  | R/A              | I                    | A (approval)    | I                |
| Approve correction EP Delta   | C                | R                    | A               | I                |

R = Responsible, A = Accountable, C = Consulted, I = Informed.

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### 11.3 Authority and Delegation Controls

Authority to perform operational actions within the framework — modifying evidence, approving corrections, authorizing Tier 2 access, releasing holds, closing recalls — is governed by authority and delegation controls.

#### Authority Operating Rules:

- No single-party override. No individual entity or role can unilaterally modify evidence, override holds, or bypass governance controls. All material actions require multi-party authorization per the RACI matrices.
- Delegation must be documented. When authority is delegated (e.g., a senior pharmacist delegates dispensation approval to a staff pharmacist, or a governance body delegates change control authority to a working group), the delegation is recorded as an evidence artifact with: delegator identity, delegate identity, scope of delegation, temporal validity, and conditions for revocation.
- Delegation chains are limited. Multi-level delegation (A delegates to B, B delegates to C) is permitted only with explicit governance approval and documented justification. Each delegation level is independently auditable.
- Emergency delegation follows expedited approval. In emergencies, delegation may be activated on an expedited basis with post-hoc documentation, but the delegation must still be documented and the emergency conditions verified.

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### 11.4 Material Change Triggers

Material changes — events or conditions requiring notification, re-evaluation, and documentation — are defined per Baseline D conventions, extended for healthcare contexts.

#### Material Change Trigger Catalog:

| Trigger Category    | Specific Triggers  | Required Response   |
|---------------------|--|---|
| Product-level       | New product safety information; batch/lot recall; manufacturer production change; formulation modification; packaging change | Re-assessment of affected PAES, SES; notification to downstream custody holders; governance documentation |
| Authorization-level | Prescriber credential revocation or restriction; institutional formulary change; regulatory reclassification of product      | Re-assessment of affected AES; hold on pending dispensation where applicable; governance documentation    |
| Custody-level       | Custody entity loss of authorization; storage facility compromise; logistics provider change; new custody node onboarded     | Re-assessment of affected CES; re-verification of custody chain integrity; governance documentation       |
| Safety-level        | Clinical decision-support algorithm update; interaction database major version change; new contraindication identified       | Re-assessment of affected SES; notification to dispensation points; governance documentation              |

| Trigger Category | Specific Triggers  | Required Response  |
|------------------|--|--|
| Governance-level | Change in governance body composition; change in authority delegation; change in reconciliation cadence; change in access policy | Governance documentation; stakeholder notification; recertification evaluation                             |
| Technology-level | Evidence storage system migration; content-addressing algorithm change; cryptographic algorithm update                           | Change control procedure per Section 11.4 and Baseline B's crypto-agility baseline; conformance re-testing |

**Material Change Response.** Each material change trigger activates a standardized response: the trigger event is logged as a MATERIAL\_CHANGE event in the ILS, the affected scope is identified, downstream impact is assessed, and the governance body determines whether recertification (Section 11.5) is required.

## 11.5 Recertification Cadence

Recertification is the periodic validation that operational controls, participant capabilities, evidence quality, and governance procedures continue to meet framework requirements. Recertification cadences follow Baseline D conventions.

### Recertification Schedule:

| Recertification Type                   | Default Cadence | Trigger for Off-Cycle Recertification  | Evidence Produced   |
|--|-----------------|--|---|
| Participant operational readiness      | Annual          | Material change trigger affecting participant capabilities; SEV-1 or SEV-2 incident                      | Recertification report with conformance assessment; deficiency identification; remediation plan |
| Evidence quality assessment            | Semi-annual     | Repeated evidence integrity failures (3+ BRK-INTEG in 90 days); examiner finding of evidence gaps        | Evidence quality audit report; gap inventory; remediation verification                          |
| Governance control effectiveness       | Annual          | Material change in governance body composition or authority delegation; governance violation detected    | Governance control review report; RACI validation; delegation audit                             |
| Reconciliation framework effectiveness | Quarterly       | Reconciliation break rates exceeding defined thresholds; new reconciliation type added                   | Reconciliation performance report; break trend analysis; cadence adjustment recommendations     |
| Tiered access compliance               | Annual          | Post-access review finding of scope violation; overdue PARP; Tier 2 access frequency exceeding threshold | Access compliance report; PARP completion rates; scope violation inventory                      |

## 11.6 Liability Trigger Catalog

A liability trigger is an operational condition that requires immediate action, escalation, and evidence preservation. The liability trigger catalog extends Baseline C's catalog with healthcare-specific triggers.

### Healthcare Liability Trigger Catalog:

| Trigger ID | Condition   | Severity | Immediate Action  | Evidence Requirement  |
|------------|---|----------|---|---|
| LT-01      | Confirmed counterfeit product detected in custody chain             | Critical | Quarantine all affected units; incident escalation; regulatory notification               | Preservation Bundle with all provenance and custody evidence                |
| LT-02      | Dispensation of product under active recall                         | Critical | Patient notification per institutional policy; corrective action; regulatory notification | Dispensation record, recall notification, acknowledgment evidence           |
| LT-03      | Authorization issued by entity with revoked credentials             | High     | Hold all pending dispensation under affected authorizations; investigation                | AES with revocation evidence; affected dispensation inventory               |
| LT-04      | Evidence integrity failure suggesting deliberate tampering          | Critical | Containment of affected evidence; incident investigation; governance notification         | Integrity failure evidence; investigation records; affected state inventory |
| LT-05      | Tier 2 access scope violation detected                              | High     | Access terminated; post-access review escalated; governance notification                  | Access event records; scope deviation documentation                         |
| LT-06      | Unresolved SEV-1 reconciliation break exceeding resolution SLA      | High     | Escalation to governance body; expanded investigation scope                               | Break detection records; investigation timeline; SLA documentation          |
| LT-07      | Silent overwrite of evidence artifact detected (no EP Delta)        | Critical | Containment of affected evidence chain; integrity investigation                           | Original and modified artifact hashes; access logs; investigation records   |
| LT-08      | Dispensation precondition gate bypassed without documented override | High     | Post-dispensation review; hold on future dispensation at affected point                   | Gate bypass evidence; dispensation record; override documentation (if any)  |

## 11.7 Incident Escalation and Containment

Incident escalation follows the tiered approach established in Baseline B's Incident Response Playbook, applied to healthcare operational incidents.

### Escalation Tiers:

| Incident Severity                     | Notification Timeline   | Escalation Path  | Containment Actions   |
|---------------------------------------|---|--|---|
| Critical (LT-01, LT-02, LT-04, LT-07) | Governance body notified within 2 hours; regulatory notification per institutional policy | Incident Coordination Function → Governance Body → Regulatory liaison                              | Immediate hold-only containment; affected scope quarantine; Preservation Bundle initiated |
| High (LT-03, LT-05, LT-06, LT-08)     | Governance body notified within 8 hours   | Operational management → Incident Coordination Function → Governance Body if unresolved within SLA | Hold-only containment on affected downstream actions; Tier 1 investigation initiated      |
| Moderate                              | Governance body notified within 24 hours  | Operational management → Change Control Board if systemic issue                                    | Investigation initiated; no hold unless escalation conditions met                         |
| Low                                   | Included in periodic governance reporting   | Operational management   | Correction during next reconciliation cycle   |

**Containment Principles.** Containment actions are proportional, documented, and reversible. Hold-only containment restricts state changes but does not destroy evidence, modify records, or bypass governance controls. Containment scope is determined by the incident scope — not expanded beyond what the evidence supports.

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## 11.8 No-Master-Key Posture and Distributed Approvals

The framework maintains a strict no-master-key posture inherited from Baselines A and B. No single entity, role, or key holder can unilaterally perform any of the following actions:

- Override hold-only containment without documented resolution and approval chain.
- Modify content-addressed evidence artifacts after storage.
- Bypass dispensation precondition gates.
- Grant Tier 2 reviewer access.
- Close a recall without governance approval.
- Execute a correction without documented authorization and EP Delta generation.
- Activate or deactivate legal hold without documented authority.

**Distributed Approval Requirements.** All material governance actions require approval from two or more independent parties per the RACI matrices. "Independent" means that the approving parties do not share reporting relationships, institutional affiliations, or financial interests that would compromise the independence of their judgment. Independence requirements are documented at governance body formation and verified at each recertification cycle.

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## 11.9 Accountability for Corrections, Overrides, Recalls, and Supersession Events

Every correction, override, recall, and supersession event generates an accountability record documenting who took the action, under what authority, with what justification, and with what downstream impact.

## Accountability Record — Minimum Fields:

| Field                        | Description  |
|------------------------------|--|
| event_id                     | Unique content-addressed identifier for the accountability record  |
| event_type                   | CORRECTION, OVERRIDE, RECALL, SUPERSESSION, HOLD_RELEASE, GOVERNANCE_ACTION  |
| actor_id                     | Pseudonymized or role-based identifier of the acting entity  |
| authority_reference          | Pointer to the governance approval, delegation instrument, or institutional authority under which the action was taken |
| justification                | Documented reason for the action, with evidence references   |
| affected_scope               | Products, authorizations, custody chains, dispensation events, or evidence artifacts affected                          |
| downstream_impact_assessment | Assessment of downstream actions that relied on the prior state and may require adjustment                             |
| approval_chain               | All approvals obtained, with approver identifiers and timestamps   |
| timestamp                    | UTC timestamp of action execution  |
| content_address              | Self-referential hash of this accountability record  |

**Accountability Record Retention.** Accountability records are retained for the longest of: the retention period applicable to the affected evidence, the institutional governance retention requirement, and any applicable legal hold duration. Accountability records are never subject to shorter retention than the evidence they govern.

**Accountability Record Access.** Accountability records are accessible at Tier 0 (aggregate statistics: correction rates, override frequencies, recall counts) and at Tier 1 (specific accountability records for identified events under documented purpose code and TTL). Tier 2 access to underlying actor identities follows standard Tier 2 requirements.

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## 12. Financially Consequential Workflows (Optional / Conditional Scope)

*This section is included because the optional Baseline E (Payments & Settlement Constitution) materially improves coherence for healthcare claim, reimbursement, and payout workflows. Where financially consequential workflows are not in scope, this section may be omitted without affecting the remainder of the framework.*

### 12.1 Claim and Reimbursement Event Taxonomy

Financially consequential events in healthcare workflows follow a defined lifecycle. Each event generates evidence artifacts stored as ILS records with content-addressed integrity, linked to underlying product, authorization, dispensation, and safety evidence.

#### Claim Lifecycle Event Taxonomy:

| Event Code    | Event Name       | Description                                  | Evidence Generated                        |
|---------------|------------------|--|---|
| CLM_SUBMITTED | Claim Submission | Claim for reimbursement submitted to benefit | Claim record with dispensation reference, |

| Event Code      | Event Name         | Description   | Evidence Generated  |
|-----------------|--------------------|---|---|
|                 |                    | administrator or payer, referencing a specific dispensation event   | authorization reference, product reference, claimant identification, amount                   |
| CLM_VALIDATED   | Claim Validation   | Claim validated against required evidence linkages — dispensation evidence exists, authorization is VALID, product authenticity is VERIFIED | Validation record with linkage check results per evidence category                            |
| CLM_ADJUDICATED | Claim Adjudication | Claim reviewed and determination issued (approved, denied, pended for additional information)   | Adjudication record with determination, reason code, reviewed evidence references             |
| CLM_APPROVED    | Claim Approved     | Claim approved for reimbursement or payout  | Approval record with evidence sufficiency confirmation; all prerequisite states verified      |
| CLM_DENIED      | Claim Denied       | Claim denied with documented reason and evidence references   | Denial record with reason code, evidence references, appeal pathway documentation             |
| CLM_PENDED      | Claim Pended       | Claim held pending resolution of evidence condition (missing evidence, stale evidence, disputed evidence)                                   | Pend record with hold reason, required resolution actions, expected timeline                  |
| CLM_PAID        | Claim Paid         | Payout executed and settlement confirmed  | Settlement confirmation with payment reference, amount, payout timing, linked approval record |
| CLM_ADJUSTED    | Claim Adjusted     | Previously paid claim subject to post-payment correction (overpayment, underpayment, retroactive evidence change)                           | Adjustment record with reason, amount delta, rebinding to corrected evidence chain            |
| CLM_REVERSED    | Claim Reversed     | Previously paid claim fully reversed due to evidence invalidation (revoked authorization, recalled product, fraudulent claim)               | Reversal record with reason, linked invalidation evidence, recovery initiation                |
| CLM_APPEALED    | Claim Appeal       | Denied or adjusted claim appealed by claimant   | Appeal submission with additional evidence or argumentation; appeal review initiated          |

**Event Chaining.** Claim lifecycle events form a content-addressed chain per Baseline C conventions. Each event record contains the content hash of the preceding event, the claim reference ID, and cross-references to the underlying dispensation, authorization, and product evidence. The complete claim chain is traversable for reviewer replay.

## 12.2 Evidence-Linked Release, Claim, or Reimbursement Gating

The central principle from Baseline E applies directly: financially consequential actions should not proceed when evidence states are materially unresolved. Claim progression from CLM\_SUBMITTED to CLM\_APPROVED requires that linked evidence states meet minimum completeness thresholds.

### Claim Evidence Gate (Conceptual):

| Gate                        | Verification Required   | Failure Response   |
|-----------------------------|---|--|
| CG-1: Dispensation Evidence | Dispensation event record exists, is content-addressed, and references a valid dispensation precondition gate completion          | Claim pended (CLM_PENDED); dispensation evidence gap documented                                  |
| CG-2: Authorization Linkage | Referenced authorization state = VALID or EXPIRED-but-was-valid-at-dispensation-time; issuer legitimacy CONFIRMED at dispensation | Claim pended if authorization state unresolved; denied if authorization REVOKED pre-dispensation |
| CG-3: Product Authenticity  | Referenced product authenticity state = VERIFIED at dispensation time   | Claim pended if authenticity UNRESOLVED; denied if authenticity FAILED                           |
| CG-4: Safety Evidence       | Proof-of-safety state = SUFFICIENT at dispensation time (required evidence classes present and current)                           | Claim pended if safety evidence INSUFFICIENT; review escalation if safety DISPUTED               |
| CG-5: No Active Recall/Hold | Product not subject to active recall or hold at claim submission time   | Claim pended if active recall; claim review initiated if recall occurred post-dispensation       |
| CG-6: No Duplicate Claim    | No prior paid claim exists for the same dispensation event  | Claim denied as duplicate; existing paid claim referenced  |

**Gate Execution.** All gates are evaluated at CLM\_VALIDATED. Gate results are logged as part of the validation record. A failure at any gate results in CLM\_PENDED (for resolvable conditions) or CLM\_DENIED (for conditions indicating the claim should not be paid). Gate results reference the specific evidence artifacts examined, enabling reviewer replay of the validation decision.

**Temporal Evidence Assessment.** Claim evidence gates assess evidence state at the time of the dispensation event, not at the time of claim submission. An authorization that was VALID at dispensation but has since EXPIRED does not block the claim — the gate confirms that the authorization was valid when the dispensation occurred. Conversely, an authorization that was REVOKED before the dispensation event blocks the claim even if it is currently shown as REVOKED (the revocation preceded the dispensation).

## 12.3 Settlement / Payout Linkage for Approved Claims

Approved claims progress to payout through evidence-linked settlement confirmation adapted from Baseline E's DvP finality model.

### Payout Evidence Chain:

CLM\_APPROVED

- Payout instruction generated with:
  - claim\_id (content address)
  - approval\_record\_reference (content address)
  - payout\_amount
  - payee\_reference
  - payment\_method\_reference
- Payout execution confirmed with:
  - payment\_reference (transaction ID from payment system)
  - execution\_timestamp
  - amount\_confirmed
  - settlement\_status: SETTLED | FAILED | PENDING
- CLM\_PAID event generated linking:
  - claim approval to payout execution
  - complete evidence chain traversable from  
claim → dispensation → authorization → product → custody

**Payout Finality.** Consistent with Baseline E's treatment of settlement finality as an "evidence-backed condition, not an assertion," payout finality is documented through evidence artifacts — not claimed through system status alone. A CLM\_PAID event is generated only when the payout execution confirmation is received and validated. Pending payouts remain in CLM\_APPROVED state until execution is confirmed.

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## 12.4 Hold or Segmentation Logic for Financially Unresolved States

When evidence conditions block claim progression, the framework applies hold or segmentation logic to prevent financially consequential actions on unresolved states.

### Financial Hold Categories:

| Hold Category     | Trigger   | Effect                              | Resolution Pathway   |
|-------------------|---|-------------------------------------|--|
| Evidence gap hold | Required evidence artifact absent or incomplete (CG-1 through CG-4 failure) | Claim held at CLM_PENDED; no payout | Evidence gap resolved; gate re-evaluated; claim progresses if gates pass |
| Recall hold       | Product subject to active   | Claim held; payout                  | Recall resolved (product   |

| Hold Category                | Trigger  | Effect  | Resolution Pathway  |
|------------------------------|--|---|---|
|                              | recall at claim submission or between dispensation and claim   | blocked   | cleared or replacement dispensed); claim re-evaluated                                     |
| Authorization dispute hold   | Authorization validity disputed between parties  | Claim held pending dispute resolution                                     | Dispute resolved per Section 8.6; authorization state confirmed; claim re-evaluated       |
| Duplicate detection hold     | Potential duplicate claim identified (same dispensation, different claim IDs)                                  | Both claims held pending investigation                                    | Investigation confirms duplicate (one denied) or confirms distinct claims (both progress) |
| Post-payment correction hold | Evidence state changes after payout (authorization revoked, product recalled, dispensation evidence corrected) | Recovery assessment initiated; future claims from same source may be held | Adjustment (CLM_ADJUSTED) or reversal (CLM_REVERSED) executed per determination           |

**Segmentation.** Held claim amounts are logically segmented from payable amounts in benefit administration systems. Segmentation evidence is logged as ILS records documenting the segregation of held versus payable funds. This adapts Baseline E's escrow segmentation logic to healthcare reimbursement contexts.

## 12.5 Unmatched Claim / Unmatched Settlement / Unmatched Payout Breaks

Reconciliation between claim records, settlement records, and payout records may reveal unmatched items — claims without corresponding payouts, payouts without corresponding claims, or settlement amounts that do not match claim amounts.

### Unmatched Item Taxonomy:

| Unmatched Type       | Description  | Break Severity  | Resolution  |
|----------------------|--|---|---|
| Claim without payout | CLM_APPROVED exists but no corresponding CLM_PAID within expected payout cycle | SEV-3 (Moderate) initially; escalates to SEV-2 if payout cycle exceeded by 2x | Investigation of payout system; re-submission if processing failure; escalation if systemic |
| Payout without claim | Payment record exists without corresponding approved claim                     | SEV-2 (High) — potential unauthorized payment                                 | Immediate investigation; recovery if unauthorized; correction if claim record lost          |
| Amount mismatch      | CLM_PAID amount differs from CLM_APPROVED amount beyond tolerance              | SEV-3 if within rounding tolerance; SEV-2 if material                         | Adjustment (CLM_ADJUSTED) for amount correction; investigation for systemic pricing errors  |
| Duplicate payout     | Multiple CLM_PAID events for single CLM_APPROVED                               | SEV-1 (Critical) — potential fraud or system error                            | Immediate investigation; recovery of duplicate amount; system control review                |

| Unmatched Type      | Description   | Break Severity | Resolution   |
|---------------------|---|----------------|--|
| Orphaned adjustment | CLM_ADJUSTED exists without corresponding original CLM_PAID | SEV-2          | Investigation of adjustment origin; correction or reversal per determination |

**Open Breaks Register.** Adapted from Baseline E (Section 10.2): all unmatched items are maintained in an open breaks register for claim/reimbursement reconciliation. Breaks exceeding defined age thresholds trigger escalation, governance notification, and preservation bundle creation. The register is a mandatory component of the claim/reimbursement evidence pack.

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## 12.6 Adjustment, Reversal, and Post-Correction Rebinding

When evidence changes after payout — an authorization is retroactively revoked, a product is recalled, or dispensation evidence is corrected — the framework provides structured adjustment and reversal pathways.

### Adjustment Workflow:

1. **Trigger detection.** Upstream evidence change (authorization revocation, product recall, dispensation correction) detected through reconciliation or downstream propagation (Section 8.7).
2. **Impact assessment.** Affected claims identified through evidence linkage chain traversal. Financial impact quantified.
3. **Determination.** Adjustment authority determines appropriate response: partial adjustment (CLM\_ADJUSTED with amount delta), full reversal (CLM\_REVERSED), or no action (if upstream change does not materially affect claim validity).
4. **Execution.** Adjustment or reversal executed with evidence record linking to the upstream change that triggered it, the original claim and payout records, and the determination authority and justification.
5. **Rebinding.** If the upstream evidence is corrected (not invalidated), the claim evidence linkage is rebound to the corrected evidence through EP Delta. The original linkage is preserved as historical state per Section 3.9 conventions.
6. **Recovery.** If reversal creates a recovery obligation (funds to be returned), recovery initiation is logged and tracked in the open breaks register until recovered or written off per institutional policy.

**Non-Destructive Correction.** Consistent with Section 8.3: adjustments and reversals do not delete original claim or payout records. They create new events (CLM\_ADJUSTED, CLM\_REVERSED) linked to the originals through content-addressed references.

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## 12.7 Operational Finality of Claim or Payout Evidence (Not Legal Finality)

Claim and payout finality within this framework is operational — it indicates that the evidence chain is complete, reconciled, and not subject to unresolved breaks. Operational finality does not constitute legal finality, adjudication of coverage rights, or waiver of adjustment or recovery rights.

**Operational Finality Conditions for Claim Evidence:**

| Condition                                     | Verification  |
|---|---|
| Dispensation evidence complete and reconciled | PAES, AES, CES, SES cross-referenced and aligned                |
| Authorization valid at dispensation time      | Temporal evidence assessment confirms VALID state               |
| Claim evidence gates passed                   | All CG gates passed at CLM_VALIDATED                            |
| Payout executed and confirmed                 | CLM_PAID event generated with settlement confirmation           |
| No open breaks in claim evidence chain        | Open breaks register shows zero unresolved items for this claim |
| Reconciliation current                        | Most recent claim-evidence reconciliation shows ALIGNED         |

**Post-Finality Correction.** Even after operational finality, corrections remain possible through the adjustment and reversal pathways (Section 12.6). Post-finality corrections follow enhanced governance procedures: multi-party approval, documented legal or contractual basis, and preservation of the complete pre-correction evidence chain. This adapts Baseline E's post-settlement correction protocol directly.

## 13. Offboarding, Legacy Compatibility, and Reversibility Without Data Loss

### 13.1 Offboarding Triggers

Offboarding is the controlled transition of product, authorization, custody, or safety evidence from the framework's evidence system to a legacy system — or the orderly wind-down of a participant's use of the framework. Offboarding may be triggered by:

| Trigger                     | Description  | Governance Requirement   |
|-----------------------------|--|--|
| Institutional decision      | Participant decides to transition to alternative evidence management system                | Governance notification; orderly transition per offboarding plan               |
| Pilot conclusion            | Framework pilot period ends; participants transition per program plan                      | Steering committee approval of offboarding plan; coordinated timeline          |
| Participant non-conformance | Participant fails recertification or conformance requirements; cannot remediate within SLA | Governance determination; suspension followed by offboarding                   |
| Regulatory directive        | Regulatory authority directs cessation of framework participation                          | Immediate compliance; offboarding per regulatory timeline                      |
| System decommission         | Evidence storage or operational system decommissioned                                      | Change control process; migration plan; offboarding of affected evidence scope |
| Product lifecycle end       | Product withdrawn from market; no further dispensation, claim, or review expected          | Transition to archival-only evidence management                                |

**Pre-Offboarding Requirements.** Before offboarding execution begins: all active holds must be resolved or transferred; all open reconciliation breaks must be resolved or documented in the open breaks disclosure (Section 13.6); all pending claims must be adjudicated or transferred; and governance approval for offboarding must be documented.

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## 13.2 Final State Snapshots

At offboarding initiation, the framework generates a comprehensive final state snapshot capturing the current state of all evidence within the offboarding scope.

### Final State Snapshot Contents:

| Component   | Description  | Format  |
|---|--|---|
| Product evidence snapshot                             | Current PAES for all products within offboarding scope, including authenticity state, provenance state, and recall/hold status | Content-addressed manifest with artifact references       |
| Authorization evidence snapshot                       | Current AES for all authorizations within scope, including validity state and supersession chain status                        | Content-addressed manifest with full supersession chains  |
| Custody evidence snapshot                             | Current CES for all products within scope, including chain status and most recent custody event                                | Content-addressed manifest with custody chain endpoints   |
| Safety evidence snapshot                              | Current SES for all products/decisions within scope, including evidence class currency status                                  | Content-addressed manifest with evidence class references |
| Reconciliation posture snapshot                       | Most recent reconciliation results for all reconciliation types within scope   | Content-addressed reconciliation reports                  |
| Open breaks snapshot                                  | All unresolved breaks at offboarding initiation with status, severity, and investigation state                                 | Open breaks register export                               |
| Claim/reimbursement snapshot (if Section 12 in scope) | All pending claims, open breaks register for claims, and recent claim lifecycle events   | Content-addressed claim evidence manifest                 |

**Snapshot Integrity.** The final state snapshot is content-addressed as a whole — a master hash covers all component manifests, enabling a single integrity verification of the complete snapshot. The snapshot is signed by the responsible officer per institutional governance.

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## 13.3 Final Reconciliation Proof

After the final state snapshot is generated, a final reconciliation cycle is executed covering all evidence types within the offboarding scope.

### Final Reconciliation Requirements:

- All reconciliation types from Section 9.5 are executed at the offboarding scope.

- All breaks detected in the final reconciliation are documented in the final reconciliation report.
- Breaks that can be resolved within the offboarding timeline are resolved through standard break resolution workflows (Section 9.6).
- Breaks that cannot be resolved before offboarding completion are documented as open breaks in the offboarding disclosure (Section 13.6).
- The final reconciliation report is content-addressed and signed by the responsible officer.

**Final Reconciliation Report — Minimum Contents:**

| Element                       | Description   |
|-------------------------------|---|
| Reconciliation scope          | Products, authorizations, custody chains, and evidence artifacts covered        |
| Reconciliation types executed | All types from Section 9.5 cadence matrix                                       |
| Alignment results per type    | ALIGNED count, BREAK_DETECTED count per reconciliation type                     |
| Break inventory               | All detected breaks with type, severity, and resolution status                  |
| Resolved breaks               | Breaks resolved during final reconciliation with resolution evidence references |
| Unresolved breaks             | Breaks carried forward as open breaks with justification for non-resolution     |
| Reconciliation attestation    | Responsible officer sign-off confirming completeness and accuracy               |
| Report content address        | Self-referential hash for integrity verification                                |

**13.4 Legacy Transition Manifest**

The legacy transition manifest documents the mapping between the framework's evidence artifacts and the legacy system's record structure, enabling the receiving system to ingest, verify, and maintain the evidence chain.

**Legacy Transition Manifest — Structure:**

```
legacy_transition_manifest:
  manifest_id: [content_address]
  offboarding_scope: [description of scope]
  source_system: [framework identifier]
  target_system: [legacy system identifier]
  transition_timestamp: [UTC]
  mapping_table:
    - framework_artifact_type: PAES
      legacy_equivalent: [legacy product record type]
      field_mapping: [field-by-field mapping document reference]
      data_loss_assessment: [fields not representable in legacy; mitigation]
    - framework_artifact_type: AES
```

```
    legacy_equivalent: [legacy authorization record type]
    field_mapping: [field-by-field mapping document reference]
    data_loss_assessment: [fields not representable in legacy; mitigation]
- ... [continued for all evidence types]
completeness_verification:
    total_artifacts_in_scope: [count]
    artifacts_successfully_mapped: [count]
    artifacts_with_data_loss: [count with descriptions]
    artifacts_not_mappable: [count with justification and archival plan]
transition_attestation:
    attesting_officer: [identity]
    attestation_timestamp: [UTC]
    attestation_statement: "The legacy transition mapping is complete and
        accurate. Data loss items are documented. Non-mappable artifacts are
        archived per retention policy."
manifest_content_address: [self-referential hash]
```

**Data Loss Assessment.** Where the legacy system cannot represent certain evidence fields (e.g., content-addressed integrity markers, hash chain linkage, tiered access metadata), the data loss assessment documents: what fields are lost, what operational capability is affected, and what mitigation is applied (typically: archival of the complete framework evidence alongside the legacy records, enabling retrieval of the full evidence chain from the archive if needed post-offboarding).

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## 13.5 Portable Evidence Set and Bounded Transfer

Evidence transfer to the legacy system or successor system follows bounded transfer principles — only evidence within the offboarding scope is transferred; evidence outside scope remains in the framework.

### **Bounded Transfer Rules:**

- Evidence is transferred as content-addressed artifacts with integrity verification at both source and destination.
- The transfer is logged as a chain-of-custody event for the evidence artifacts: source system, destination system, transfer timestamp, transferring authority, and integrity verification results at both endpoints.
- The receiving system acknowledges ingestion and confirms record counts and integrity verification results. Ingestion acknowledgment is logged as part of the offboarding evidence.
- Evidence not accepted by the receiving system (format incompatibility, integrity failure, unmappable fields) is documented in the transition manifest and archived in the framework's storage per retention policy.

**Post-Transfer Verification.** After transfer, a verification step confirms that the legacy system's records accurately reflect the framework's evidence at the point of transition. Verification includes: record count comparison, key field value spot-checks, and integrity verification of content-addressed artifacts where the legacy system supports content addressing.

### 13.6 Open-Break Disclosure Requirements

If unresolved reconciliation breaks exist at offboarding completion, they must be disclosed in the offboarding documentation.

#### Open-Break Disclosure — Required Contents:

| Element                   | Description  |
|---------------------------|--|
| Break inventory           | All unresolved breaks with break ID, type, severity, and description   |
| Investigation status      | Current investigation status for each break; evidence gathered to date   |
| Reason for non-resolution | Documented reason why the break could not be resolved before offboarding (time constraint, evidence unavailability, dispute pending) |
| Impact assessment         | Assessment of each break's potential impact on product integrity, authorization validity, claim accuracy, or safety evidence         |
| Mitigation plan           | Actions to address each break post-offboarding (continued investigation, monitoring, escalation to governance)                       |
| Accountable party         | Entity responsible for each break's post-offboarding resolution  |
| Disclosure attestation    | Responsible officer sign-off confirming that all known breaks are disclosed and no breaks are concealed                              |

**Zero-Break Preference.** Adapted from Baseline E (Section 10.2): the offboarding proof bundle requires open breaks = 0 or an explicit, approved break list. Where open breaks exist, governance approval for offboarding with open breaks must be documented, including acknowledgment of the associated risks.

### 13.7 Archival Retention and Post-Offboarding Monitoring

After offboarding completion, the framework's copy of the evidence is archived — not deleted — with retention policies consistent with institutional requirements.

#### Archival Retention Requirements:

| Evidence Category                             | Minimum Retention Post-Offboarding  | Access Conditions   |
|---|---|---|
| Product authenticity and provenance evidence  | 7 years post-offboarding or per institutional policy (whichever is longer)                                  | Tier 1 or Tier 2 access per standard tiered access requirements |
| Authorization evidence                        | 7 years post-offboarding  | Same  |
| Custody evidence                              | 7 years post-offboarding  | Same  |
| Safety evidence and clinical decision records | 10 years post-offboarding or per institutional policy (alignment objective: match product liability window) | Same; enhanced preservation for adverse event records           |
| Claim/reimbursement                           | 7 years post-offboarding  | Same  |

| Evidence Category                       | Minimum Retention Post-Offboarding                | Access Conditions                           |
|---|---|---|
| evidence (if Section 12 in scope)       |   |   |
| Offboarding proof bundle                | Indefinite (or per institutional archival policy) | Tier 1 access under documented purpose code |
| Preservation bundles (incident-related) | Indefinite  | Tier 1 or Tier 2 access                     |

**Post-Offboarding Monitoring.** For a defined monitoring period after offboarding (alignment objective: 12 months), the framework maintains visibility into:

- Open break resolution status (breaks disclosed under Section 13.6 tracked to closure).
- Recall or safety notifications affecting products that were in scope during framework operation.
- Examiner or regulatory requests for evidence from the offboarded scope.
- Integrity verification of archived evidence (periodic hash verification per reconciliation cadence).

Post-offboarding monitoring is conducted at reduced cadence (alignment objective: monthly rather than continuous) but follows the same evidence and governance discipline as active operations.

## 14. Examiner Readiness: Standard Checks Pack + Reviewer / Examiner Query Pack

### 14.1 Authenticity Checks

Standard checks for product authenticity verification, aligned with the examiner query pack structure from Baselines A and C.

| Check ID | Check Purpose                                 | Evidence Required  | Pass Criteria   | Fail Criteria   | Severity |
|----------|---|--|---|---|----------|
| AUTH-001 | Verify CPO exists for all products in scope   | CPO registry; PAES manifests                             | 100% of dispensed products have CPO with content-addressed integrity        | Any product dispensed without CPO   | High     |
| AUTH-002 | Verify manufacturer identity evidence current | AES for manufacturer credential; freshness check records | Manufacturer credential verified within applicable freshness window         | Manufacturer credential expired or unverified at dispensation                 | High     |
| AUTH-003 | Verify provenance manifest completeness       | Provenance manifests for sampled products                | Sampled provenance manifests show COMPLETE chain status; no unresolved gaps | Any sampled manifest shows BROKEN or PARTIAL without documented investigation | Critical |
| AUTH-004 | Verify content-addressed integrity            | Hash chain verification                                  | 100% hash chain verifications pass for                                      | Any hash chain failure  | Critical |

| Check ID | Check Purpose  | Evidence Required                                  | Pass Criteria  | Fail Criteria  | Severity |
|----------|--|--|--|--|----------|
|          | of provenance chain                                    | results  | sampled products   |  |          |
| AUTH-005 | Verify authenticity state accurately reflects evidence | PAES with state determination; supporting evidence | Authenticity state consistent with evidence (VERIFIED only when all evidence elements present) | Authenticity state VERIFIED but evidence elements missing or stale | High     |

## 14.2 Provenance and Custody Checks

| Check ID | Check Purpose   | Evidence Required                                      | Pass Criteria  | Fail Criteria  | Severity      |
|----------|---|--|--|--|---------------|
| PROV-001 | Verify custody event chain completeness for sampled products      | CES for sampled products                               | No undocumented custody gaps in sampled chains   | Custody gap detected without corresponding break record                  | High          |
| PROV-002 | Verify handoff confirmation from both sender and receiver         | CUS_HANDOFF and CUS_RECEIPT event pairs                | All sampled handoffs have matching sender/receiver confirmations                                 | Handoff without matching receipt or receipt without matching handoff     | High          |
| PROV-003 | Verify storage condition monitoring active during storage periods | Storage condition logs; excursion records              | Continuous condition records present for all storage periods; excursions documented and assessed | Storage periods without condition records; excursions without assessment | Moderate–High |
| PROV-004 | Verify repackaging events authorized                              | CUS_REPACKAGE events; repackager credential evidence   | All repackaging events linked to authorized repackager credential                                | Repackaging event without authorized entity credential                   | High          |
| PROV-005 | Verify aggregation hierarchy maintained                           | Aggregation linkage records; disaggregation event logs | All child units traceable to parent aggregation; no orphaned units                               | Units not traceable to parent; aggregation breaks                        | Moderate      |
| PROV-006 | Verify custody chain integrity at recall scope determination      | Recall scope records; custody chain traversal results  | All affected units identified through aggregation hierarchy; current custodians notified         | Recall scope incomplete; units not accounted for                         | Critical      |

### 14.3 Authorization and Issuer-Legitimacy Checks

| Check ID | Check Purpose  | Evidence Required  | Pass Criteria  | Fail Criteria  | Severity |
|----------|--|--|--|--|----------|
| ISSU-001 | Verify issuer legitimacy confirmed at dispensation                   | AES linked to dispensation events                              | All sampled dispensation events linked to AES with legitimacy state CONFIRMED                | Dispensation without issuer legitimacy verification                          | Critical |
| ISSU-002 | Verify authorization freshness at dispensation time                  | AES freshness check timestamps; freshness window configuration | Issuer credential verified within applicable freshness window at dispensation time           | Credential verification stale beyond freshness window at dispensation        | High     |
| ISSU-003 | Verify revocation check performed at dispensation                    | Revocation check records in AES                                | Revocation check logged for each dispensation; result CLEAR or appropriately handled         | Dispensation without revocation check; or REVOKED result without hold action | Critical |
| ISSU-004 | Verify scope-match between authorization and dispensation            | Scope-match verification records                               | Authorization bounds (product, quantity, location, purpose) match dispensation parameters    | Scope mismatch without documented override or correction                     | High     |
| ISSU-005 | Verify supersession chain integrity for multi-version authorizations | Supersession chain records                                     | Ordered chain; no ambiguous current-reference state; dispensation bound to current version   | Dispensation bound to superseded authorization without re-verification       | High     |
| ISSU-006 | Verify delegation authority where delegated prescribing applies      | Delegation records; delegator AES                              | Delegation instrument current; delegator authority verified; delegation scope matches action | Delegation expired, delegator authority unverified, or scope exceeded        | High     |

### 14.4 Proof-of-Safety and Review-State Checks

| Check ID | Check Purpose   | Evidence Required                      | Pass Criteria   | Fail Criteria  | Severity |
|----------|---|--|---|--|----------|
| SAFE-001 | Verify required safety evidence classes present at dispensation | SES for sampled dispensation events    | All required evidence classes (per Section 7.2 matrix) present for sampled events | Required evidence class absent for dispensation event  | High     |
| SAFE-002 | Verify safety evidence currency at dispensation                 | Evidence class timestamps; source data | Evidence classes current relative to source data version                          | Evidence class generated against outdated source data; | High     |

| Check ID | Check Purpose   | Evidence Required  | Pass Criteria   | Fail Criteria  | Severity |
|----------|---|--|---|--|----------|
|          | time  | version references   | at dispensation time  | not refreshed  |          |
| SAFE-003 | Verify safety alert overrides documented                              | Safety alert records; override documentation                         | All overrides linked to DS-05 (prescriber clinical rationale) with documented justification       | Override without documentation; or documentation inadequate per review posture | Critical |
| SAFE-004 | Verify context-bound decision state records for high-impact decisions | Decision state records per Section 7.3                               | High-impact decisions have complete context-bound decision state records with all required fields | High-impact decision without decision state record or with incomplete fields   | High     |
| SAFE-005 | Verify decision state replay capability                               | Decision state records; referenced evidence artifacts                | Sampled decision states can be independently reconstructed from evidence references               | Evidence referenced by decision state unavailable or integrity-failed          | High     |
| SAFE-006 | Verify superseded safety evidence triggers appropriate action         | Safety evidence supersession records; downstream dispensation events | Dispensation events after evidence supersession reference refreshed (not superseded) evidence     | Dispensation relying on superseded safety evidence without refresh             | High     |

### 14.5 Recall / Quarantine / Correction Checks

| Check ID | Check Purpose                              | Evidence Required   | Pass Criteria   | Fail Criteria  | Severity |
|----------|--|---|---|--|----------|
| RCLL-001 | Verify recall scope determination complete | Recall initiation records; scope determination; aggregation hierarchy traversal | All affected units identified; all current custody holders notified | Scope determination incomplete; holders not notified                         | Critical |
| RCLL-002 | Verify recall acknowledgment tracking      | CUS_RECALL_ACK events; acknowledgment tracking records                          | All notified custody holders acknowledged within SLA                | Acknowledgment missing or overdue without escalation                         | High     |
| RCLL-003 | Verify recalled products quarantined       | CUS_QUARANTINE_ENTRY events for recalled products                               | All identified affected units quarantined or returned or destroyed  | Recalled units not quarantined; disposition unknown                          | Critical |
| RCLL-004 | Verify corrections generate EP Deltas      | Correction records; EP Delta artifacts  | All corrections produce EP Deltas with prior state preserved        | Correction without EP Delta; or prior state not preserved (silent overwrite) | Critical |
| RCLL-005 | Verify correction approval chain           | Correction approval records   | All material corrections approved                                   | Correction without required approval   | High     |

| Check ID | Check Purpose                                | Evidence Required  | Pass Criteria   | Fail Criteria   | Severity |
|----------|--|--|---|---|----------|
|          | documented                                   |  | by appropriate authority per RACI                                     |   |          |
| RCLL-006 | Verify downstream propagation of corrections | Propagation records; affected downstream event inventory | All downstream events affected by correction identified and addressed | Downstream events referencing pre-correction state without update | High     |

### 14.6 Bounded-Access Compliance Checks

| Check ID | Check Purpose   | Evidence Required                             | Pass Criteria  | Fail Criteria  | Severity |
|----------|---|---|--|--|----------|
| ACCS-001 | Verify all Tier 2 access events have dual-control approval    | Tier 2 access event records; approval records | All Tier 2 access events have documented dual-control approval with independent approvers                              | Tier 2 access without dual-control approval                                  | Critical |
| ACCS-002 | Verify TTL enforcement for Tier 1 and Tier 2 access           | Access event records; TTL expiration records  | All access grants expired at TTL; no access beyond TTL without renewal   | Access continuing beyond TTL without documented renewal                      | High     |
| ACCS-003 | Verify post-access review completion for Tier 2 events        | Post-Access Review Pack (PARP) records        | All Tier 2 access events have completed PARP within 5-business-day SLA   | PARP missing, incomplete, or overdue   | High     |
| ACCS-004 | Verify purpose limitation compliance                          | Access event purpose codes; evidence accessed | Evidence accessed consistent with documented purpose code; no scope creep  | Evidence accessed outside documented purpose scope                           | High     |
| ACCS-005 | Verify minimization and redaction in evidence pack exports    | Exported evidence packs; redaction logs       | Prohibited data elements redacted; minimization techniques applied; redaction logged                                   | Prohibited data elements present in exported evidence; missing redaction log | High     |
| ACCS-006 | Verify Tier 0 outputs contain no individual-identifiable data | Tier 0 report samples                         | Sampled Tier 0 outputs contain only aggregate statistics; no individual product, patient, or practitioner identifiable | Individual-identifiable data in Tier 0 output                                | High     |

### 14.7 Governance and Recertification Checks

| Check ID | Check Purpose                                | Evidence Required                         | Pass Criteria   | Fail Criteria  | Severity |
|----------|--|---|---|--|----------|
| GOVN-001 | Verify recertification completed per cadence | Recertification records; cadence schedule | All recertification cycles completed on schedule; no overdue recertifications | Overdue recertification without documented extension | High     |
| GOVN-002 | Verify material change triggers              | Material change event records; governance | All material change triggers logged;  | Material change without trigger                      | High     |

| Check ID | Check Purpose   | Evidence Required   | Pass Criteria  | Fail Criteria  | Severity |
|----------|---|---|--|--|----------|
|          | documented  | response records  | governance response documented within SLA  | documentation or governance response   |          |
| GOVN-003 | Verify no-master-key posture maintained                 | Governance action records; approval chains                | All material governance actions have multi-party approval; no single-party override detected | Single-party override of governance control                                      | Critical |
| GOVN-004 | Verify RACI accountability for critical activities      | RACI matrices; operational records for sampled activities | Sampled activities executed per RACI assignments; accountability documented                  | Activity executed by unauthorized party or without required accountable approval | High     |
| GOVN-005 | Verify liability trigger catalog maintained and current | Liability trigger catalog; trigger event records          | Catalog current; all trigger events logged and responded to per catalog requirements         | Trigger events not logged or response not per catalog                            | High     |

### 14.8 Offboarding Checks

| Check ID | Check Purpose  | Evidence Required  | Pass Criteria   | Fail Criteria  | Severity |
|----------|--|--|---|--|----------|
| OFFB-001 | Verify final state snapshot generated and integrity-verified | Final state snapshot manifest; integrity verification results    | Snapshot complete; master hash verified; officer attestation present              | Snapshot incomplete or integrity verification failed           | High     |
| OFFB-002 | Verify final reconciliation executed and documented          | Final reconciliation report                                      | All reconciliation types executed; results documented; breaks inventoried         | Final reconciliation incomplete or undocumented                | High     |
| OFFB-003 | Verify open breaks disclosed                                 | Open-break disclosure document; governance approval              | All unresolved breaks disclosed; governance approved offboarding with open breaks | Undisclosed open breaks discovered post-offboarding            | Critical |
| OFFB-004 | Verify legacy transition manifest complete                   | Legacy transition manifest; field mapping; data loss assessment  | All evidence types mapped; data loss documented; non-mappable artifacts archived  | Evidence types not mapped; data loss not documented            | High     |
| OFFB-005 | Verify post-transfer verification completed                  | Verification records; record count comparisons; integrity checks | Legacy system records match framework evidence at transition point                | Verification failed or not performed                           | High     |
| OFFB-006 | Verify archival retention applied                            | Archival records; retention metadata                             | All evidence archived per retention requirements; no premature                    | Evidence destroyed before retention period; archive incomplete | High     |

| Check ID | Check Purpose | Evidence Required | Pass Criteria | Fail Criteria | Severity |
|----------|---------------|-------------------|---------------|---------------|----------|
|          |               |                   | destruction   |               |          |

## 14.9 Conceptual Query Families (SQL / Pseudocode / Retrieval Logic)

This section provides conceptual query patterns that reviewers can adapt to their specific retrieval infrastructure. Queries reference the evidence taxonomy and event codes defined throughout this framework.

### Query Family 1: Product Authenticity and Provenance

-- QRY-PAES-001: Retrieve authenticity state for a product at a specific time

```
SELECT p.product_reference_id, p.authenticity_state, p.state_timestamp,
       p.paes_manifest_hash, p.provenance_chain_status
FROM product_authenticity_states p
WHERE p.cpo_content_address = :target_cpo
      AND p.state_timestamp <= :target_timestamp
ORDER BY p.state_timestamp DESC
LIMIT 1;
```

-- QRY-PROV-001: Identify all custody gaps for a product

```
SELECT ce.event_id, ce.event_type, ce.timestamp, ce.actor_id,
       ce.previous_event_hash,
       CASE WHEN ce.previous_event_hash != lag_hash THEN 'GAP_DETECTED'
            ELSE 'CHAIN_INTACT' END AS chain_status
FROM custody_events ce
LEFT JOIN (
    SELECT event_id, content_address AS lag_hash
    FROM custody_events
) prev ON ce.previous_event_hash = prev.lag_hash
WHERE ce.product_cpo_reference = :target_cpo
ORDER BY ce.timestamp;
```

-- QRY-PROV-002: Count products with unresolved provenance breaks

```
SELECT COUNT(DISTINCT pm.cpo_reference) AS products_with_breaks
FROM provenance_manifests pm
WHERE pm.chain_status IN ('PARTIAL', 'BROKEN')
      AND pm.manifest_timestamp >= :period_start
```

```
AND pm.manifest_timestamp <= :period_end;
```

### **Query Family 2: Authorization and Dispensation**

```
-- QRY-AUTH-001: Verify authorization validity at dispensation time
```

```
SELECT d.dispensation_event_id, d.timestamp AS dispensation_time,  
       a.authorization_id, a.validity_state AS auth_state_at_dispensation,  
       a.issuer_legitimacy_state, a.freshness_status  
FROM dispensation_events d  
JOIN authorization_states a ON d.authorization_reference = a.authorization_id  
AND a.state_timestamp <= d.timestamp  
AND a.state_timestamp = (  
    SELECT MAX(a2.state_timestamp) FROM authorization_states a2  
    WHERE a2.authorization_id = d.authorization_reference  
        AND a2.state_timestamp <= d.timestamp  
    )  
WHERE d.timestamp >= :period_start AND d.timestamp <= :period_end;
```

```
-- QRY-AUTH-002: Identify dispensation events with stale issuer verification
```

```
SELECT d.dispensation_event_id, d.timestamp,  
       aes.currency_check_timestamp,  
       EXTRACT(DAY FROM d.timestamp - aes.currency_check_timestamp)  
       AS days_since_verification  
FROM dispensation_events d  
JOIN authorization_evidence_sets aes  
    ON d.authorization_reference = aes.authorization_reference  
WHERE EXTRACT(DAY FROM d.timestamp - aes.currency_check_timestamp)  
    > :freshness_window_days  
AND d.timestamp >= :period_start;
```

### **Query Family 3: Safety Evidence and Decision Replay**

```
-- QRY-SAFE-001: Verify required safety evidence classes present
```

```
SELECT d.dispensation_event_id, d.product_cpo_reference,  
       ses.evidence_class, ses.status, ses.freshness_status  
FROM dispensation_events d  
CROSS JOIN required_evidence_classes rec  
LEFT JOIN safety_evidence_sets ses  
    ON d.dispensation_event_id = ses.dispensation_reference
```

```

    AND rec.evidence_class = ses.evidence_class
WHERE d.timestamp >= :period_start
    AND ses.evidence_class IS NULL; -- returns missing evidence classes

-- QRY-SAFE-002: Retrieve context-bound decision states with overrides
SELECT ds.decision_id, ds.decision_type, ds.decision_timestamp,
       ds.override_flag, ds.override_justification,
       ds.algorithm_version, ds.output_result
FROM decision_states ds
WHERE ds.override_flag = TRUE
    AND ds.decision_timestamp >= :period_start
ORDER BY ds.decision_timestamp;

```

#### **Query Family 4: Reconciliation and Break Management**

```

-- QRY-RECON-001: Open breaks inventory with aging
SELECT b.break_id, b.break_type, b.severity, b.detected_at,
       EXTRACT(DAY FROM CURRENT_TIMESTAMP - b.detected_at) AS age_days,
       b.investigation_status, b.assigned_to
FROM reconciliation_breaks b
WHERE b.lifecycle_status NOT IN ('RESOLVED', 'CLOSED')
ORDER BY b.severity, b.detected_at;

-- QRY-RECON-002: Break resolution SLA compliance
SELECT b.severity,
       COUNT(*) AS total_breaks,
       SUM(CASE WHEN b.resolution_time <= b.sla_target THEN 1 ELSE 0 END)
       AS within_sla,
       ROUND(SUM(CASE WHEN b.resolution_time <= b.sla_target THEN 1 ELSE 0 END)
            * 100.0 / COUNT(*), 1) AS sla_compliance_pct
FROM reconciliation_breaks b
WHERE b.detected_at >= :period_start
    AND b.lifecycle_status IN ('RESOLVED', 'CLOSED')
GROUP BY b.severity;

```

#### **Query Family 5: Tiered Access Compliance**

```

-- QRY-ACCS-001: Tier 2 access events without completed PARP
SELECT ta.access_event_id, ta.timestamp, ta.actor_id,

```

```

        ta.purpose_code, ta.ttl_expiry,
        parp.review_timestamp AS parp_completed_at
FROM tier2_access_events ta
LEFT JOIN post_access_review_packs parp
    ON ta.access_event_id = parp.access_event_reference
WHERE parp.review_timestamp IS NULL
    OR parp.review_timestamp > ta.ttl_expiry + INTERVAL '5 days';

-- QRY-ACCS-002: Purpose code distribution for reviewer access
SELECT ta.purpose_code, ta.tier_level, COUNT(*) AS access_count,
       AVG(EXTRACT(HOUR FROM ta.ttl_expiry - ta.timestamp)) AS avg_ttl_hours
FROM all_access_events ta
WHERE ta.timestamp >= :period_start
GROUP BY ta.purpose_code, ta.tier_level
ORDER BY access_count DESC;

```

### **Query Family 6: Claim and Reimbursement (Optional — Section 12)**

```

-- QRY-CLM-001: Claims with evidence gate failures
SELECT c.claim_id, c.submission_timestamp, c.claim_status,
       cg.gate_id, cg.gate_result, cg.failure_reason
FROM claims c
JOIN claim_evidence_gates cg ON c.claim_id = cg.claim_id
WHERE cg.gate_result = 'FAIL'
    AND c.submission_timestamp >= :period_start;

-- QRY-CLM-002: Post-payment adjustments and reversals
SELECT c.claim_id, c.original_amount, adj.adjustment_amount,
       adj.adjustment_reason, adj.upstream_change_reference,
       adj.adjustment_timestamp
FROM claim_adjustments adj
JOIN claims c ON adj.claim_id = c.claim_id
WHERE adj.adjustment_timestamp >= :period_start
ORDER BY adj.adjustment_timestamp;

```

## 15. Worked Examples (Paste-Ready)

### 15.1 Medicine Provenance Verification with Unresolved Substitution Risk and Hold-Only Containment

**Scenario.** Regional Distributor D receives a shipment of 5,000 units of Product X (an injectable biologic, narrow therapeutic index) from Manufacturer M. At receiving verification (CUS\_RECEIPT), the automated product identity check flags a discrepancy: the batch/lot reference on the physical packaging does not match the batch/lot reference in the provenance manifest transmitted electronically by Manufacturer M.

**Timeline:**

| Time (UTC) | Event   | Actor                             | Evidence Generated   |
|------------|---|-----------------------------------|--|
| T+0:00     | Shipment received at Distributor D warehouse  | Distributor D receiving dock      | CUS_RECEIPT initiated; physical inspection record  |
| T+0:15     | Automated CPO verification flags batch/lot mismatch: physical label shows LOT-2026-0488; provenance manifest references LOT-2026-0487   | Distributor D verification system | BRK-PROV (provenance break) detection record; severity assessment: SEV-2 (High) — narrow therapeutic index product |
| T+0:20     | Hold-only containment applied to all 5,000 units  | Distributor D compliance          | CUS_HOLD_ENTRY: hold_reason = "BATCH_LOT_MISMATCH"; affected_units = 5000; hold_authority = "COMPLIANCE_OFFICER_D" |
| T+0:25     | Manufacturer M notified; investigation initiated  | Distributor D → Manufacturer M    | Investigation initiation record; notification evidence   |
| T+4:00     | Manufacturer M responds: labeling error confirmed — physical labels printed with LOT-0488, but production records confirm product is LOT-0487; provides corrected labeling documentation and production release certificate | Manufacturer M quality function   | Manufacturer correction evidence: production release cert (content-addressed), corrected label attestation         |
| T+6:00     | Distributor D quality assessment confirms product integrity not affected (labeling error only; product itself is correct formulation and batch)   | Distributor D quality function    | Quality assessment record with determination: "labeling discrepancy — no product integrity impact"                 |
| T+8:00     | Correction EP Delta generated: CPO updated  | Distributor D + Manufacturer M    | EP Delta: previous_state = BRK-PROV detected; new_state = RECONSTRUCTED;   |

| Time (UTC) | Event   | Actor                      | Evidence Generated  |
|------------|---|----------------------------|---|
|            | with labeling note; provenance manifest annotation added                                |                            | correction_authority = "MANUFACTURER_M_QUALITY + DISTRIBUTOR_D_QUALITY"   |
| T+8:30     | Hold released; product re-enters dispensable inventory with VERIFIED authenticity state | Distributor D compliance   | CUS_HOLD_RELEASE: resolution_evidence = [correction EP Delta, quality assessment, manufacturer attestation]; approval_chain = [compliance_officer_D, quality_manager_D] |
| T+9:00     | Post-resolution reconciliation confirms alignment; break lifecycle closed               | Distributor D surveillance | Break closure record: BREAK-HC-2026-0112; resolution_time = 9h; root_cause = "labeling_print_error"   |

**Evidence Artifacts Produced:**

- CUS\_RECEIPT with verification failure (ILS)
- BRK-PROV detection record with SEV-2 classification (ILS)
- CUS\_HOLD\_ENTRY with scope and authority (ILS)
- Manufacturer correction documentation (content-addressed)
- Quality assessment record (content-addressed)
- Correction EP Delta linking original break to resolution (content-addressed)
- CUS\_HOLD\_RELEASE with approval chain (ILS)
- Break closure record (ILS)
- Preservation Bundle (PB-BREAK-HC-2026-0112) containing all above artifacts

**Examiner Replay Query:** "Show complete timeline for break BREAK-HC-2026-0112 from detection through closure, including manufacturer response evidence and hold lifecycle."

## 15.2 Prescription Legitimacy Review with Expiry or Revocation Ambiguity Requiring Bounded Reviewer Escalation

**Scenario.** Pharmacy P receives a refill request for Patient Q's chronic medication (Product Y, 90-day supply). The dispensation precondition gate (G2: Authorization Validity) flags the prescription: the prescribing physician's credential was updated 15 days ago, and the update record is ambiguous — it could indicate a routine renewal or a scope restriction affecting Product Y's therapeutic category.

**Timeline:**

| Time (UTC) | Event  | Actor                          | Evidence Generated  |
|------------|--|--------------------------------|---|
| T+0:00     | Refill request submitted for Patient Q, Product Y  | Pharmacy P dispensation system | Dispensation request record   |
| T+0:02     | Gate G2 check: AES for prescriber Dr. R retrieved; currency_check_timestamp = 15 days ago; | Pharmacy P gate engine         | Gate G2 result: PENDED; reason = "ISSUER_CREDENTIAL_UPDATE_AMBIGUOUS" |

| <b>Time (UTC)</b> | <b>Event</b>   | <b>Actor</b>                   | <b>Evidence Generated</b>  |
|-------------------|--|--------------------------------|--|
|                   | credential update detected but update_type = AMBIGUOUS (system cannot determine renewal vs. restriction)   |                                |  |
| T+0:03            | Dispensation blocked; hold-only containment on this refill event   | Pharmacy P compliance          | Hold record: pending authorization review  |
| T+0:10            | Tier 1 reviewer access requested: purpose_code = PUR-RECON-BREAK; scope = Dr. R's AES and credential update record; TTL = 14 days  | Pharmacy P compliance officer  | Tier 1 access request record with justification  |
| T+0:15            | Tier 1 access granted; reviewer examines Dr. R's AES (pseudonymized at Tier 1: "PRESCRIBER_REF_48 21")   | Access approver                | Access grant record; TTL assigned  |
| T+2:00            | Tier 1 review determines: credential update was a scope restriction — Dr. R's authority for Product Y's therapeutic category was narrowed effective 15 days ago; the active prescription was issued before the restriction | Reviewer                       | Review finding record: "Prescription issued under valid authority pre-restriction; prescription itself not revoked; however, refill authority may be affected" |
| T+3:00            | Determination: prescription valid at issuance (pre-restriction); refill requires re-assessment because prescriber's current scope no longer covers Product Y category; escalation to prescriber or authorized substitute   | Pharmacy P clinical pharmacist | Determination record: "Refill held pending prescriber re-authorization or transfer to authorized prescriber"   |
| T+24:00           | Dr. R confirms: refers Patient Q to Dr. S (authorized for Product Y category); Dr. S issues new prescription superseding Dr. R's original  | Dr. R → Dr. S                  | Supersession record: Dr. R's prescription → SUPERSEDED; Dr. S's prescription → VALID; AES for Dr. S: legitimacy CONFIRMED, scope covers Product Y              |
| T+25:00           | Dispensation precondition  | Pharmacy P                     | Gate completion record: all gates PASS   |

| Time (UTC) | Event   | Actor                | Evidence Generated  |
|------------|---|----------------------|---|
|            | gates re-evaluated against Dr. S's prescription: all gates pass | gate engine          |   |
| T+25:15    | Dispensation executed; refill released to Patient Q             | Pharmacy P           | CUS_DISPENSATION event; dispensation evidence record with all gate results  |
| T+25:30    | Post-access review for Tier 1 access completed; PARP generated  | Independent reviewer | PARP: access scope verified; no scope deviation; finding supported the hold; prescriber notification occurred appropriately |

**Evidence Artifacts Produced:**

- Dispensation request and gate failure records (ILS)
- Tier 1 access request, grant, and PARP (ILS)
- Review finding and determination records (content-addressed)
- Supersession chain: Dr. R prescription → SUPERSEDED → Dr. S prescription (CURRENT)
- Dr. S AES with legitimacy CONFIRMED (content-addressed)
- Gate completion and dispensation records (ILS)

### 15.3 Dispensation Workflow with Stale Custody Evidence Triggering Containment and Replay

**Scenario.** Hospital H's automated dispensation system initiates release of Product Z (a controlled substance) from the hospital pharmacy's automated dispensing cabinet to Clinical Unit 4. Gate G4 (Custody Integrity) detects that the most recent custody event for Product Z in this cabinet is 96 hours old — exceeding the 72-hour freshness threshold for controlled substance custody evidence.

**Timeline:**

| Time (UTC) | Event   | Actor                      | Evidence Generated   |
|------------|---|----------------------------|--|
| T+0:00     | Dispensation request for Product Z to Clinical Unit 4   | Hospital H ordering system | Dispensation request record  |
| T+0:01     | Gate G4 check: CES freshness review — last custody event (CUS_STORAGE_ENTRY) timestamp = T-96h; freshness threshold for controlled substances = 72h | Hospital H gate engine     | Gate G4 result: FAIL; reason = "STALE_CUSTODY_EVIDENCE_96H_VS_72H_THRESHOLD"   |
| T+0:02     | Dispensation blocked; hold-only containment   | Hospital H pharmacy system | Hold record: "Custody evidence stale; re-verification required before controlled substance release"  |
| T+0:30     | Hospital pharmacist performs manual custody verification: physical count of Product Z in cabinet matches system records;                            | Hospital H pharmacist      | Manual custody verification record: physical_count = MATCH; access_log_review = NO_ANOMALY; verification_method = "MANUAL_COUNT_AND_ACCESS_LOG_REVIEW" |

| Time (UTC) | Event  | Actor                                   | Evidence Generated  |
|------------|--|---|---|
|            | cabinet access logs reviewed — no unauthorized access detected   |   |   |
| T+0:45     | Fresh custody event generated: CUS_STORAGE_EXIT from automated cabinet with manual verification attestation              | Hospital H pharmacy system + pharmacist | CUS_STORAGE_EXIT with manual verification linkage; custody chain updated                  |
| T+0:50     | Gate G4 re-evaluated: custody evidence now current (timestamp = T+0:45); all gates pass                                  | Hospital H gate engine                  | Gate completion record: all gates PASS; G4 note = "Re-verified after stale evidence hold" |
| T+0:55     | Dispensation executed under Enhanced review posture (controlled substance + hold event = elevated evidence preservation) | Hospital H pharmacy                     | CUS_DISPENSATION with Enhanced review posture classification                              |

**Key Evidence Pattern:** The stale custody evidence did not indicate a safety problem — it indicated an evidence gap. The framework's response was proportional: hold-only containment until fresh evidence obtained, then release. The manual verification pathway (Section 7.6) provided the evidence refresh without requiring system replacement.

## 15.4 High-Impact Clinical-Decision Support Output Reviewed Under Minimal Disclosure Constraints

**Scenario.** Clinical Decision-Support System (CDSS) at Hospital H generates a contraindication alert for Patient P: the system detects a potential interaction between newly prescribed Product A and Patient P's existing medication Product B. The prescribing physician overrides the alert and authorizes dispensation. Six months later, a quality review examines override patterns for this CDSS version.

### Decision State at Override (T+0):

context\_bound\_decision\_state:

decision\_id: DS-HC-2026-07821

decision\_type: CONTRAINDICATION\_OVERRIDE

decision\_timestamp: 2026-03-15T09:22:00Z

decision\_actor: PRESCRIBER\_REF\_6104 (pseudonymized)

evidence\_snapshot:

PS-01: product\_safety\_profile\_v12.3 [content\_hash: bafybei...]

PS-02: adverse\_reaction\_profile\_v8.1 [content\_hash: bafybei...]

DS-01: contraindication\_screening\_output [content\_hash: bafybei...]

→ result: ALERT\_INTERACTION\_MODERATE  
 → interaction\_database\_version: IntDB-v2026.03  
 DS-02: drug\_interaction\_screening\_output [content\_hash: bafybei...]  
 → result: INTERACTION\_DETECTED\_MODERATE\_SEVERITY  
 DS-05: prescriber\_clinical\_rationale [content\_hash: bafybei...]  
 → rationale: "Patient has tolerated combination previously for  
 18 months without adverse reaction; benefits outweigh risks  
 in this clinical context"  
 algorithm\_version: CDSS-v4.2.1  
 override\_flag: true  
 override\_justification: DS-05 reference above  
 review\_posture: EXCEPTIONAL  
 content\_address: bafybei\_decision\_state\_07821...

**Quality Review at T+6 months (Tier 1 Access):**

| Review Step | Action  | Disclosure Level   |
|-------------|---|--|
| 1           | Reviewer queries override frequency for CDSS-v4.2.1   | Tier 0: aggregate statistics — "47 overrides in 6-month period; 12 for CONTRAINDICATION_OVERRIDE type"   |
| 2           | Reviewer requests decision state records for CONTRAINDICATION_OVERRIDE events                               | Tier 1: decision state records with pseudonymized actor and patient; clinical rationale visible; interaction details visible; patient identity NOT disclosed |
| 3           | Reviewer verifies evidence snapshot currency: was IntDB-v2026.03 current at decision time?                  | Tier 1: version comparison — IntDB-v2026.03 was current at T+0; IntDB-v2026.09 is now current; reviewer checks whether new version would change the alert    |
| 4           | Reviewer confirms override justification documentation adequate per Exceptional review posture requirements | Tier 1: DS-05 rationale reviewed; determination: "documentation adequate — prior tolerance history documented"   |
| 5           | Post-access review completed; PARP generated  | Independent reviewer: access scope verified; no escalation to Tier 2 required  |

**Key Evidence Pattern:** The reviewer reconstructed the complete decision context — what the CDSS showed, what the prescriber decided, what rationale was documented, and whether the evidence was current — without accessing patient identity, full clinical records, or the CDSS internal state. Bounded verification achieved.

## 15.5 Product Recall / Quarantine Workflow with Correction, Supersession, and Historical-State Preservation

**Scenario.** Manufacturer M issues a voluntary recall for Product W, Batch LOT-2026-0955, due to a confirmed potency deviation detected during stability testing. The recall affects an estimated 12,000 units distributed to 8 distributors and approximately 45 pharmacy/hospital endpoints.

### Recall Lifecycle Summary:

| Phase                | Duration       | Key Actions  | Evidence Outputs   |
|----------------------|----------------|--|--|
| RECALL_INITIATED     | T+0            | Manufacturer M issues recall notification with scope: Product W, LOT-2026-0955, urgency classification = CLASS II (potential health impact, not immediately life-threatening)    | Recall notification record (content-addressed); scope determination with aggregation hierarchy traversal; urgency classification documentation |
| RECALL_ACKNOWLEDGED  | T+0 to T+48h   | 8 distributors and 45 endpoints receive notification; each acknowledges and reports affected inventory; total identified: 11,847 units (153 units already dispensed to patients) | 53 CUS_RECALL_ACK events; inventory assessment records; 153 post-dispensation patient notification triggers                                    |
| QUARANTINED          | T+48h to T+72h | All 11,694 undispensed units quarantined at respective custody locations   | 45+ CUS_QUARANTINE_ENTRY events with segregation verification  |
| RETURNED/DESTROYED   | T+72h to T+30d | 10,200 units returned to Manufacturer M; 1,494 units destroyed at custody locations (per institutional destruction policies)   | CUS_RETURN events (return chain); CUS_DESTRUCTION events (witness records, disposal evidence)  |
| Patient notification | T+48h to T+14d | 153 patients notified per institutional policies; clinical assessment offered  | Notification records (pseudonymized patient references); clinical re-assessment records where applicable                                       |
| Scope correction     | T+10d          | Manufacturer M discovers additional 200 units from same batch shipped to 2 additional endpoints  | Recall scope correction record (EP Delta); previous_scope → expanded_scope; additional notifications sent                                      |

| Phase         | Duration | Key Actions  | Evidence Outputs  |
|---------------|----------|--|---|
|               |          | not in original scope;<br>recall scope expanded  |   |
| RECALL_CLOSED | T+45d    | All 12,047 units accounted for: 10,400 returned, 1,494 destroyed, 153 dispensed (patients notified); open breaks = 0 | Recall closure report: scope_total = 12,047; accounted = 12,047; unaccounted = 0; governance approval for closure |

**Historical-State Preservation:** All pre-recall product states (PAES, CES, SES) are preserved in their original form. The recall does not overwrite or delete prior evidence. The recall events are additive — they extend the evidence chain. Post-recall, a reviewer can reconstruct both the pre-recall product state (what was known before the recall) and the recall lifecycle (how the recall was executed).

## 15.6 Optional Claim or Reimbursement Workflow Where Payout Progression Depends on Sufficient Evidence Linkage

**Scenario.** Pharmacy P submits a reimbursement claim (CLM-2026-08847) for the dispensation of Product V to Patient R. The benefit administrator's claim evidence gate detects that the authorization (prescription) referenced by the claim was revoked 3 days after dispensation. The revocation was due to the prescriber's credential restriction, not due to a problem with the dispensation itself.

### Claim Lifecycle:

| Time   | Event  | State   | Evidence  |
|--------|--|---|---|
| T-10d  | Prescription issued by Dr. K for Product V; dispensation executed at Pharmacy P; all gates passed at dispensation time               | Authorization: VALID;<br>Dispensation: RELEASED                               | AES (Dr. K legitimacy CONFIRMED at T-10d); dispensation evidence record with all gates PASS                                       |
| T-7d   | Dr. K's credential restricted (scope narrowed); prescription status unchanged in pharmacy system                                     | Authorization: VALID (no revocation event yet for this specific prescription) | Dr. K credential restriction EP Delta   |
| T-4d   | Institutional governance reviews Dr. K's active prescriptions; revokes 12 prescriptions including Patient R's, effective immediately | Authorization: REVOKED  | Revocation EP Delta for Patient R's prescription; downstream impact assessment: 1 dispensation already completed, 1 claim pending |
| T+0    | Pharmacy P submits claim CLM-2026-08847  | Claim: CLM_SUBMITTED  | Claim record with dispensation reference, authorization reference   |
| T+0:05 | Claim evidence gate CG-2 (Authorization Linkage) evaluates:  | Gate CG-2: PASS (temporal assessment)   | Gate result: "Authorization REVOKED post-dispensation;  |

| Time   | Event  | State                | Evidence   |
|--------|--|----------------------|--|
|        | authorization is REVOKED — but temporal assessment confirms authorization was VALID at dispensation time (T-10d)                       |                      | was VALID at dispensation time per temporal evidence assessment"       |
| T+0:10 | All claim evidence gates pass; claim validated   | Claim: CLM_VALIDATED | Validation record with all gate results                                |
| T+1d   | Claim adjudicated: approved for reimbursement; note attached that authorization was subsequently revoked but was valid at service time | Claim: CLM_APPROVED  | Adjudication record with note referencing post-dispensation revocation |
| T+5d   | Payout executed  | Claim: CLM_PAID      | Settlement confirmation  |

**Key Evidence Pattern:** The temporal evidence assessment (Section 12.2) evaluated authorization state at dispensation time, not at claim time. The post-dispensation revocation did not invalidate the claim because the dispensation was properly authorized when it occurred. The complete evidence chain — including the revocation and its timing — is preserved for reviewer access.

---

# Appendix A — Product, Authorization, Custody, and Proof-of-Safety State Taxonomy Tables (Full)

## A.1 Product Authenticity State — Complete Values

| State Value  | Code              | Definition  | Transition From   | Transition To   | Evidence Required   |
|--------------|-------------------|---|---|---|---|
| Verified     | AUTH_VERIFIED     | All authenticity evidence elements present, current, and consistent                               | NOT_ASSESSED, UNRESOLVED, RECONSTRUCTED (post-correction) | UNRESOLVED (evidence becomes stale), FAILED (contradiction detected)              | Complete PAES; provenance manifest COMPLETE; manufacturer identity CONFIRMED; integrity checks PASS |
| Unresolved   | AUTH_UNRESOLVED   | Evidence incomplete, stale, or under investigation; no active contradiction                       | NOT_ASSESSED, AUTH_VERIFIED (if evidence becomes stale)   | AUTH_VERIFIED (evidence completed/refreshed), FAILED (contradiction found)        | Partial PAES with documented gaps; investigation ILS  |
| Failed       | AUTH_FAILED       | Evidence actively contradicts claimed identity; counterfeit, substitution, or tampering indicator | AUTH_VERIFIED, AUTH_UNRESOLVED                            | QUARANTINE state in recall/hold taxonomy; RECONSTRUCTED (if investigation clears) | PAES with failure documentation; Preservation Bundle  |
| Not Assessed | AUTH_NOT_ASSESSED | No authenticity verification performed  | Initial state for newly received product                  | AUTH_VERIFIED, AUTH_UNRESOLVED, AUTH_FAILED                                       | No PAES exists  |

## A.2 Provenance State — Complete Values

| State Value   | Code               | Definition   | Evidence Required   |
|---------------|--------------------|--|---|
| Complete      | PROV_COMPLETE      | Full provenance chain documented; no gaps; all custody transitions evidenced         | Content-addressed provenance manifest; all events hash-chained                |
| Partial       | PROV_PARTIAL       | Documented segments present; at least one gap identified                             | Partial manifest with gap indicators; gap severity assessment                 |
| Broken        | PROV_BROKEN        | Confirmed break: custody transition with absent, contradictory, or tampered evidence | Break detection record; Preservation Bundle; hold-only triggered              |
| Reconstructed | PROV_RECONSTRUCTED | Previous break resolved through investigation and compensating                       | Original break evidence preserved; reconstruction evidence with approval logs |

| State Value | Code | Definition | Evidence Required |
|-------------|------|------------|-------------------|
|             |      | evidence   |                   |

### A.3 Issuer / Prescriber / Authorizer Legitimacy State — Complete Values

| State Value | Code            | Definition   | Freshness Requirement   |
|-------------|-----------------|--|---|
| Confirmed   | ISSU_CONFIRMED  | Authority verified; scope and jurisdiction validated; no revocation detected | Per authority type freshness window (Section 5.4)                     |
| Expired     | ISSU_EXPIRED    | Credentials or authority expired at or before relevant action                | N/A (terminal state until renewal)                                    |
| Revoked     | ISSU_REVOKED    | Authority revoked by credentialing body or governance process                | N/A (terminal state; new credentialing required)                      |
| Restricted  | ISSU_RESTRICTED | Authority held but with scope limitations affecting the specific action      | Same freshness as CONFIRMED; restriction details verified at each use |
| Unverified  | ISSU_UNVERIFIED | No verification performed or verification pending                            | Assessment required before downstream action                          |

### A.4 Prescription / Instruction Validity State — Complete Values

| State Value | Code          | Definition   | Lifecycle Transitions   |
|-------------|---------------|--|---|
| Valid       | RX_VALID      | Current, within scope, issued by confirmed authority, not superseded or revoked        | → EXPIRED (time), SUPERSEDED (replacement), REVOKED (explicit), SUSPENDED (investigation) |
| Expired     | RX_EXPIRED    | Validity window elapsed  | Terminal unless renewed (→ RX_VALID via renewal event)                                    |
| Superseded  | RX_SUPERSEDED | Replaced by newer prescription for same scope  | Terminal; pointer to superseding prescription maintained                                  |
| Revoked     | RX_REVOKED    | Explicitly revoked by issuer, governance, or regulatory action                         | Terminal; new prescription required   |
| Suspended   | RX_SUSPENDED  | Validity temporarily held pending investigation  | → RX_VALID (reinstated), RX_REVOKED (confirmed invalid)                                   |
| Partial     | RX_PARTIAL    | Valid for some components but not all (e.g., product valid but refill count exhausted) | Component-level resolution required   |

### A.5 Chain-of-Custody State — Complete Values

| State Value | Code        | Definition  | Downstream Consequence                      |
|-------------|-------------|---|---|
| Intact      | CUST_INTACT | Complete, unbroken chain; all handoffs documented and | Product eligible for dispensation (custody) |

| State Value   | Code               | Definition  | Downstream Consequence  |
|---------------|--------------------|---|---|
|               |                    | content-addressed   | gate passes)  |
| Gapped        | CUST_GAPPED        | One or more transitions lack evidence                                 | Hold-only if gap exceeds materiality; assessment required       |
| Compromised   | CUST_COMPROMISED   | Unauthorized custody event, storage violation, or tampering detected  | Quarantine; incident escalation; Preservation Bundle            |
| Reconstructed | CUST_RECONSTRUCTED | Previous gap resolved through investigation and compensating evidence | Gap evidence preserved; reconstruction documented with approval |

### A.6 Dispensation / Release State — Complete Values

| State Value | Code          | Definition  | Prerequisites  |
|-------------|---------------|---|--|
| Released    | DISP_RELEASED | Product dispensed to intended recipient under documented conditions | All precondition gates passed; dispensation evidence record generated  |
| Held        | DISP_HELD     | Product available but release blocked                               | At least one precondition gate failed or evidence state unresolved     |
| Returned    | DISP_RETURNED | Product returned by recipient; re-entered custody chain             | Return event documented; product re-assessment triggered               |
| Recalled    | DISP_RECALLED | Product recalled from recipient                                     | Recall event documented; acknowledgment and return/destruction tracked |

### A.7 Proof-of-Safety State — Complete Values

| State Value  | Code              | Definition  | Required Action   |
|--------------|-------------------|---|---|
| Sufficient   | SAFE_SUFFICIENT   | Required evidence classes present, current, and consistent            | Standard or enhanced review posture per Section 7.4           |
| Insufficient | SAFE_INSUFFICIENT | One or more required evidence classes missing, stale, or inconsistent | Dispensation blocked; evidence refresh or escalation required |
| Superseded   | SAFE_SUPERSEDED   | Previously sufficient evidence superseded by updated data             | Re-assessment required before next dispensation               |
| Disputed     | SAFE_DISPUTED     | Conflicting evidence classes without resolution documentation         | Hold-only; reviewer access; clinical determination required   |

### A.8 Product Recall / Quarantine / Hold State — Complete Values

| State Value | Code        | Definition  | Governance                      |
|-------------|-------------|---|---------------------------------|
| Active      | HOLD_ACTIVE | Normal operational flow; no recall, quarantine, or hold | Standard reconciliation cadence |

| State Value        | Code             | Definition  | Governance   |
|--------------------|------------------|---|--|
| Hold               | HOLD_HELD        | Hold-only containment pending investigation                   | Hold authority, scope, duration documented                         |
| Quarantined        | HOLD_QUARANTINED | Physically or logically segregated from dispensable inventory | Quarantine reason, authority, release conditions documented        |
| Recalled           | HOLD_RECALLED    | Subject to recall; downstream holders notified                | Recall scope, acknowledgment tracking, return/destruction evidence |
| Withdrawn          | HOLD_WITHDRAWN   | Permanently removed from supply chain                         | Withdrawal authority; disposal documentation                       |
| Released from Hold | HOLD_RELEASED    | Previously held; released after resolution                    | Resolution evidence, approval chain, post-release verification     |

### A.9 Correction / Supersession / Revocation State — Complete Values

| State Value | Code            | Definition   | Preservation Rule                              |
|-------------|-----------------|--|--|
| Current     | CORR_CURRENT    | Active, authoritative version                        | Standard reconciliation                        |
| Corrected   | CORR_CORRECTED  | Correction applied; corrected version is now CURRENT | Prior version retained; EP Delta generated     |
| Superseded  | CORR_SUPERSEDED | Newer version replaces this one                      | Supersession chain maintained; prior preserved |
| Revoked     | CORR_REVOKED    | Invalidated; may not be relied upon for new actions  | Revocation record; propagation to dependents   |

### A.10 Claim / Reimbursement / Settlement State — Complete Values (Optional)

| State Value | Code            | Definition                       | Evidence Linkage  |
|-------------|-----------------|----------------------------------|---|
| Submitted   | CLM_SUBMITTED   | Claim submitted for adjudication | Linked to dispensation, authorization, product evidence |
| Validated   | CLM_VALIDATED   | Evidence gates passed            | Validation record with gate results                     |
| Adjudicated | CLM_ADJUDICATED | Determination issued             | Adjudication record with reviewed evidence              |
| Approved    | CLM_APPROVED    | Approved for payout              | Evidence sufficiency confirmation                       |
| Denied      | CLM_DENIED      | Denied with documented reason    | Denial record with reason and appeal pathway            |
| Paid        | CLM_PAID        | Payout executed and confirmed    | Settlement confirmation with payment reference          |
| Held        | CLM_HELD        | Progression suspended            | Hold reason; linked evidence state unresolved           |
| Adjusted    | CLM_ADJUSTED    | Post-payment correction          | Adjustment record with reason and evidence rebinding    |
| Reversed    | CLM_REVERSED    | Full reversal                    | Reversal record with recovery initiation                |
| Appealed    | CLM_APPEALED    | Denial or adjustment appealed    | Appeal submission with additional evidence              |

# Appendix B — Evidence Set Mapping Templates for Product, Prescription, Custody, Review, and Claim States

## B.1 Product Authenticity Evidence Set (PAES) — Mapping Template

**Purpose.** Maps the evidence artifacts required to support each product authenticity state value. For each state, the template identifies the required evidence elements, their sources, content-addressing requirements, and linkage to other evidence sets.

### PAES Mapping Matrix:

| Evidence Element                           | Required for VERIFIED                 | Required for UNRESOLVED                              | Content-Addressed | Source System                    | Linked Evidence Sets                                   |
|--|---------------------------------------|--|-------------------|----------------------------------|--|
| Canonical Product Object (CPO)             | Yes — complete, integrity-verified    | Yes — must exist even if other elements incomplete   | Yes               | Manufacturer or product registry | CES (product reference); AES (manufacturer credential) |
| Manufacturer identity credential reference | Yes — ISSU_CONFIRMED within freshness | Optional (verification may be pending)               | Yes               | Credentialing body via AES       | AES (issuer legitimacy)                                |
| Batch/lot release documentation            | Yes — complete                        | Optional (may be the missing element)                | Yes               | Manufacturer production records  | CES (custody chain origin)                             |
| Provenance manifest                        | Yes — PROV_COMPLETE                   | Yes — PROV_PARTIAL acceptable with gap documentation | Yes               | Aggregated from custody events   | CES (custody event chain)                              |
| Most recent custody handoff confirmation   | Yes — within freshness                | Optional (may be stale)                              | Yes               | Current custodian                | CES (most recent custody event)                        |
| Content-addressed integrity verification   | Yes — PASS                            | Yes — must be attempted                              | Yes               | Hash verification process        | All linked evidence sets                               |

### PAES Manifest Template (Conceptual):

```

paes_manifest:
  manifest_id: [content_address]
  pack_type: PAES
  product_reference:
    cpo_content_address: [hash]
    product_reference_id: [identifier]
    batch_lot_reference: [identifier]
  authenticity_state: VERIFIED | UNRESOLVED | FAILED | NOT_ASSESSED
  state_determination_timestamp: [UTC]
  evidence_inventory:
  
```

```
cpo:
  content_address: [hash]
  integrity_status: PASS | FAIL
manufacturer_credential:
  aes_reference: [content_address of AES]
  legitimacy_state: [ISSU_ value]
  freshness_status: CURRENT | EXPIRING | EXPIRED
batch_lot_documentation:
  content_address: [hash]
  present: true | false
provenance_manifest:
  content_address: [hash]
  chain_status: COMPLETE | PARTIAL | BROKEN
most_recent_custody_event:
  content_address: [hash]
  event_type: [CUS_ code]
  event_timestamp: [UTC]
  freshness_status: CURRENT | STALE
integrity_verification:
  verification_timestamp: [UTC]
  result: PASS | FAIL
gap_documentation:
  - element: [name of missing/stale element]
    reason: [reason code]
    investigation_reference: [ILS pointer if under investigation]
linked_evidence_sets:
  aes_references: [list of content addresses]
  ces_references: [list of content addresses]
  ses_references: [list of content addresses]
manifest_content_address: [self-referential hash]
```

---

## B.2 Authorization Evidence Set (AES) — Mapping Template

**Purpose.** Maps the evidence artifacts required to support each authorization and issuer legitimacy state value.

### AES Mapping Matrix:

| Evidence Element                    | Required for ISSU_CONFIRMED         | Required for RX_VALID                       | Content-Addressed | Source System                               | Linked Evidence Sets                                |
|-------------------------------------|-------------------------------------|---|-------------------|---|---|
| Issuer credential reference         | Yes — active, non-revoked           | Yes (via AES linkage)                       | Yes               | Credentialing body or institutional records | PAES (manufacturer identity for product-level auth) |
| Scope attestation                   | Yes — covering the specific action  | Yes — scope matches dispensation parameters | Yes               | Credential content or institutional records | DEP-H (dispensation scope match)                    |
| Currency check record               | Yes — within freshness window       | Yes (implied by ISSU_CONFIRMED)             | Yes               | Verification process output                 | —   |
| Revocation check result             | Yes — CLEAR                         | Yes (implied by ISSU_CONFIRMED)             | Yes               | Revocation list or status registry          | —   |
| Prescription record (for RX states) | N/A (issuer-level)                  | Yes — complete with all bound fields        | Yes               | Prescribing system                          | DEP-H (authorization linkage)                       |
| Supersession chain (if applicable)  | N/A                                 | Yes — current-reference state determined    | Yes               | Supersession chain records                  | Prior AES versions (historical)                     |
| Delegation record (if delegated)    | Yes — delegation instrument current | Yes — delegator AES confirmed               | Yes               | Institutional records                       | Delegator AES                                       |

**AES Manifest Template (Conceptual):**

```

aes_manifest:
  manifest_id: [content_address]
  pack_type: AES
  authorization_reference:
    authorization_id: [identifier]
    authorization_type: PRESCRIPTION | INSTITUTIONAL_ORDER |
                        STANDING_ORDER | EMERGENCY | DELEGATION
  issuer_legitimacy_state: [ISSU_value]
  prescription_validity_state: [RX_value] (if applicable)
  state_determination_timestamp: [UTC]
  evidence_inventory:
    issuer_credential:
      credential_reference: [content_address]
      authority_type: [prescribing | dispensing | delegating | recalling]
      scope_attestation: [content_address]
    currency_check:

```

```

check_timestamp: [UTC]
freshness_status: CURRENT | EXPIRING | EXPIRED
revocation_check:
  check_timestamp: [UTC]
  result: CLEAR | REVOKED | RESTRICTED | UNAVAILABLE
  revocation_list_version: [reference]
prescription_record: (if applicable)
  content_address: [hash]
  bounds:
    time_bound: {validity_start, validity_end}
    location_bound: {authorized_locations[]}
    quantity_bound: {max_quantity, dispensed_to_date}
    product_bound: {authorized_products[]}
supersession_chain: (if applicable)
  chain_id: [content_address]
  current_reference: [content_address of current version]
  version_count: [integer]
delegation_record: (if delegated)
  delegation_instrument: [content_address]
  delegator_aes_reference: [content_address]
  delegation_scope: [scope description]
  delegation_validity: {start, end}
linked_evidence_sets:
  paes_references: [list – product-level authorization]
  dep_h_references: [list – dispensation linkage]
manifest_content_address: [self-referential hash]

```

---

### B.3 Custody Evidence Set (CES) — Mapping Template

**Purpose.** Maps the evidence artifacts required to support each chain-of-custody state value.

**CES Mapping Matrix:**

| Evidence Element             | Required for CUST_INTACT                                      | Required for CUST_GAPPED                         | Content-Addressed | Source System                 | Linked Evidence Sets                       |
|------------------------------|---|--|-------------------|-------------------------------|--|
| Complete custody event chain | Yes — all events from entry to current position, hash-chained | Partial — chain present but with documented gaps | Yes               | Custody event logging systems | PAES (provenance manifest cross-reference) |

| Evidence Element                          | Required for CUST_INTACT                     | Required for CUST_GAPPED                              | Content-Addressed | Source System                          | Linked Evidence Sets                     |
|---|--|---|-------------------|--|--|
| Handoff confirmations (sender + receiver) | Yes — matched pairs for all transitions      | Yes — present for documented segments; gaps indicated | Yes               | Transferring and receiving entities    | —  |
| Storage condition logs                    | Yes — continuous for all storage periods     | Yes — present for documented storage periods          | Yes               | Storage monitoring systems             | SES (PS-03 storage condition compliance) |
| Excursion records and assessments         | Yes — all excursions documented and assessed | Yes — excursions in documented periods assessed       | Yes               | Monitoring systems + quality assessors | SES (PS-04 product integrity)            |
| Repackaging records (if applicable)       | Yes — with authorized repackager credential  | If present in documented segments                     | Yes               | Repackaging entity                     | PAES (aggregation hierarchy)             |
| Current custodian verification            | Yes — current holder confirmed               | Yes — last known custodian documented                 | Yes               | Current custodian                      | —  |

**CES Manifest Template (Conceptual):**

ces\_manifest:

manifest\_id: [content\_address]

pack\_type: CES

product\_reference:

  cpo\_content\_address: [hash]

  aggregation\_level: UNIT | PACKAGE | CASE | PALLET | BATCH

custody\_state: CUST\_INTACT | CUST\_GAPPED | CUST\_COMPROMISED |

  CUST\_RECONSTRUCTED

state\_determination\_timestamp: [UTC]

chain\_summary:

  first\_event\_hash: [hash of genesis custody event]

  last\_event\_hash: [hash of most recent event]

  event\_count: [integer]

  gap\_count: [integer – 0 for INTACT]

  excursion\_count: [integer]

  excursions\_assessed: [integer – must equal excursion\_count for INTACT]

evidence\_inventory:

  custody\_events:

- event\_hash: [content\_address]
- event\_type: [CUS\_code]
- event\_timestamp: [UTC]
- actor\_id: [pseudonymized]
- chain\_integrity: VALID | BREAK

storage\_condition\_logs:

- storage\_period\_id: [identifier]
- facility\_reference: [pseudonymized]
- condition\_log\_hash: [content\_address]
- excursion\_records: [list of content addresses]

handoff\_pairs:

- handoff\_hash: [content\_address]
- receipt\_hash: [content\_address]
- matched: true | false

gap\_documentation: (if GAPPED)

- gap\_start\_event: [last known event before gap]
- gap\_end\_event: [first known event after gap]
- gap\_duration: [duration]
- severity\_assessment: [SEV-1 through SEV-4]
- investigation\_reference: [ILS pointer]

linked\_evidence\_sets:

- paes\_reference: [content\_address – provenance manifest alignment]
- ses\_references: [list – storage condition linkage to safety evidence]

manifest\_content\_address: [self-referential hash]

---

## B.4 Safety Evidence Set (SES) — Mapping Template

**Purpose.** Maps the evidence artifacts required to support each proof-of-safety state value.

### SES Mapping Matrix:

| Evidence Element                        | Required for SAFE_SUFFICIENT (Standard) | Required for SAFE_SUFFICIENT (High-Impact) | Content-Addressed | Source System                      |
|---|---|--|-------------------|------------------------------------|
| PS-01: Product safety profile reference | Yes                                     | Yes  | Yes               | Manufacturer / product registry    |
| PS-02: Known adverse reaction profile   | No (standard)                           | Yes  | Yes               | Manufacturer safety communications |

| Evidence Element                         | Required for SAFE_SUFFICIENT (Standard) | Required for SAFE_SUFFICIENT (High-Impact) | Content-Addressed | Source System                        |
|--|---|--|-------------------|--------------------------------------|
| PS-03: Storage condition compliance      | Yes                                     | Yes  | Yes               | CES storage condition logs           |
| PS-04: Product integrity confirmation    | Yes                                     | Yes  | Yes               | CES receipt and dispensation records |
| PS-05: Recall/withdrawal status          | Yes                                     | Yes  | Yes               | Recall status registry               |
| DS-01: Contraindication screening output | Yes                                     | Yes  | Yes               | Clinical decision-support system     |
| DS-02: Drug interaction screening output | Yes                                     | Yes  | Yes               | Clinical decision-support system     |
| DS-03: Dosage/quantity appropriateness   | Yes                                     | Yes  | Yes               | Dispensing system / pharmacist       |
| DS-04: Clinical decision-support output  | No (standard)                           | Yes (high-impact)                          | Yes               | Clinical decision-support system     |
| DS-05: Prescriber clinical rationale     | No (standard, unless override)          | Yes (if override)                          | Yes               | Prescriber documentation             |

**SES Manifest Template (Conceptual):**

```

ses_manifest:
  manifest_id: [content_address]
  pack_type: SES
  subject_reference:
    product_cpo: [content_address]
    dispensation_event: [content_address] (if dispensation-specific)
    decision_state: [content_address] (if decision-specific)
  safety_state: SAFE_SUFFICIENT | SAFE_INSUFFICIENT | SAFE_SUPERSEDED |
                SAFE_DISPUTED
  review_posture: STANDARD | ENHANCED | EXCEPTIONAL
  state_determination_timestamp: [UTC]
  evidence_inventory:
    product_level:
      PS-01: {content_address, version, freshness_status}
      PS-02: {content_address, version, freshness_status} # null if not
required

```

```

PS-03: {ces_reference, storage_compliance_status}
PS-04: {ces_reference, integrity_status}
PS-05: {recall_status_check_timestamp, result}
decision_level:
DS-01: {content_address, database_version, result, freshness_status}
DS-02: {content_address, database_version, result, freshness_status}
DS-03: {content_address, verification_result}
DS-04: {content_address, algorithm_version, result} # null if not
required
DS-05: {content_address, rationale_summary} # null if no override
completeness_assessment:
required_classes: [list per action type from Section 7.2]
present_classes: [list of classes with evidence]
missing_classes: [list of classes without evidence – drives INSUFFICIENT]
stale_classes: [list of classes with expired freshness]
context_bound_decision_states: (if applicable)
- decision_id: [content_address]
decision_type: [type code]
override_flag: [boolean]
review_posture: [STANDARD | ENHANCED | EXCEPTIONAL]
linked_evidence_sets:
paes_reference: [content_address – product identity linkage]
aes_reference: [content_address – authorization linkage]
ces_reference: [content_address – custody/storage linkage]
manifest_content_address: [self-referential hash]

```

---

## B.5 Dispensation Evidence Pack (DEP-H) — Mapping Template

**Purpose.** Maps the evidence artifacts produced at dispensation, linking all upstream evidence sets to the dispensation event.

### DEP-H Mapping Matrix:

| Evidence Element                    | Required                           | Content-Addressed | Source                 | Cross-Reference  |
|-------------------------------------|------------------------------------|-------------------|------------------------|--|
| Dispensation event record           | Yes                                | Yes               | Dispensing entity      | CES (terminal custody event)   |
| Precondition gate completion record | Yes — all gates G1–G7 with results | Yes               | Gate evaluation engine | PAES (G1), AES (G2), scope match (G3), CES (G4), SES (G5), hold status (G6), |

| Evidence Element             | Required   | Content-Addressed | Source                     | Cross-Reference              |
|------------------------------|--|-------------------|----------------------------|------------------------------|
|                              |  |                   |                            | revocation (G7)              |
| Dispensing entity credential | Yes  | Yes               | Dispensing entity AES      | —                            |
| Recipient reference          | Yes — pseudonymized per institutional policy             | Yes               | Dispensing entity          | —                            |
| Authorization reference      | Yes — pointer to AES with temporal validity confirmation | Yes               | Prescribing system via AES | AES (authorization evidence) |
| Product reference            | Yes — pointer to PAES with authenticity state            | Yes               | Product registry via PAES  | PAES (product authenticity)  |
| Safety evidence reference    | Yes — pointer to SES with safety state                   | Yes               | Clinical systems via SES   | SES (proof-of-safety)        |

**DEP-H Manifest Template (Conceptual):**

dep\_h\_manifest:

manifest\_id: [content\_address]

pack\_type: DEP-H

dispensation\_event:

event\_id: [content\_address]

event\_timestamp: [UTC]

dispensing\_entity: [pseudonymized]

recipient\_reference: [pseudonymized]

gate\_completion:

G1\_product\_authenticity: {result: PASS|FAIL, paes\_ref: [hash]}

G2\_authorization\_validity: {result: PASS|FAIL, aes\_ref: [hash]}

G3\_scope\_match: {result: PASS|FAIL, verification\_ref: [hash]}

G4\_custody\_integrity: {result: PASS|FAIL, ces\_ref: [hash]}

G5\_safety\_evidence: {result: PASS|FAIL, ses\_ref: [hash]}

G6\_no\_active\_hold: {result: PASS|FAIL, hold\_status\_ref: [hash]}

G7\_revocation\_check: {result: PASS|FAIL|N/A, vop\_ref: [hash]}

linked\_evidence\_sets:

paes: [content\_address]

aes: [content\_address]

ces: [content\_address]

ses: [content\_address]

review\_posture: STANDARD | ENHANCED | EXCEPTIONAL

manifest\_content\_address: [self-referential hash]

## B.6 Claim / Reimbursement Evidence Pack (CLM-EP) — Mapping Template (Optional)

**Purpose.** Maps the evidence artifacts required to support each claim/reimbursement state value. Included only where Section 12 is in scope.

### CLM-EP Mapping Matrix:

| Evidence Element                                | Required for CLM_APPROVED                                 | Content-Addressed | Source                            | Cross-Reference                      |
|---|---|-------------------|-----------------------------------|--------------------------------------|
| Claim submission record                         | Yes   | Yes               | Claimant / pharmacy               | DEP-H (dispensation reference)       |
| Claim evidence gate results (CG-1 through CG-6) | Yes — all gates passed                                    | Yes               | Benefit administrator gate engine | DEP-H, PAES, AES, CES, SES           |
| Adjudication record                             | Yes — with determination and evidence references          | Yes               | Benefit administrator             | —                                    |
| Approval record                                 | Yes — with evidence sufficiency confirmation              | Yes               | Benefit administrator             | —                                    |
| Payout execution confirmation                   | Yes (for CLM_PAID)  | Yes               | Payment system                    | —                                    |
| Temporal evidence assessment                    | Yes — confirming authorization valid at dispensation time | Yes               | Gate engine temporal logic        | AES (authorization timeline)         |
| Linked dispensation evidence                    | Yes — DEP-H reference                                     | Yes               | DEP-H                             | All upstream evidence sets via DEP-H |

### CLM-EP Manifest Template (Conceptual):

clm\_ep\_manifest:

manifest\_id: [content\_address]

pack\_type: CLM-EP

claim\_reference:

claim\_id: [identifier]

claim\_status: [CLM\_value]

dispensation\_reference:

dep\_h\_manifest: [content\_address]

dispensation\_timestamp: [UTC]

evidence\_gates:

CG-1: {result, dispensation\_evidence\_ref}

CG-2: {result, authorization\_temporal\_assessment}

CG-3: {result, authenticity\_state\_at\_dispensation}  
CG-4: {result, safety\_state\_at\_dispensation}  
CG-5: {result, recall\_status\_at\_submission}  
CG-6: {result, duplicate\_check\_ref}

adjudication:  
  adjudication\_record: [content\_address]  
  determination: APPROVED | DENIED | PENDED  
  reason\_code: [code]

payout: (if CLM\_PAID)  
  payment\_reference: [identifier]  
  amount: [value]  
  execution\_timestamp: [UTC]  
  settlement\_status: SETTLED | FAILED

open\_breaks: [count of unresolved breaks for this claim]

linked\_evidence\_sets:  
  paes: [content\_address via DEP-H]  
  aes: [content\_address via DEP-H]  
  ces: [content\_address via DEP-H]  
  ses: [content\_address via DEP-H]

manifest\_content\_address: [self-referential hash]

---

# Appendix C — Reconciliation Break Taxonomy for Authenticity, Provenance, Custody, and Safety Workflows

## C.1 Purpose and Scope

This appendix provides the complete reconciliation break taxonomy referenced throughout the framework. Each break type is defined with detection criteria, severity classification logic, default containment response, resolution pathway, and evidence requirements. The taxonomy extends Baseline A's reconciliation break classification to healthcare product, authorization, custody, and safety evidence domains.

### Taxonomy Conventions:

- Break codes use the prefix BRK- followed by a domain identifier (PROV, AUTH, CUST, SAFE, CLAIM, INTEG, FRESH).
- Each break type may manifest at multiple severity levels depending on context (product category, operational phase, recurrence pattern).
- Severity is assessed at detection using the criteria in this appendix; severity may be escalated during investigation if aggravating factors emerge.
- All break records are ILS entries with content-addressed integrity, linked to the reconciliation execution that detected them.

## C.2 Provenance Break Taxonomy (BRK-PROV)

| Break Code   | Break Name                           | Detection Criteria  | Default Severity  | Containment Response   |
|--------------|--------------------------------------|---|---|--|
| BRK-PROV-001 | Custody gap — missing handoff record | Provenance manifest shows event chain discontinuity; expected CUS_HANDOFF absent between two custody nodes                          | SEV-2 (High) for narrow therapeutic index / controlled substances; SEV-3 (Moderate) for standard products | Hold-only containment on affected units; investigation of gap period   |
| BRK-PROV-002 | Provenance chain hash break          | Content-addressed hash verification fails at one or more event transitions in the provenance manifest                               | SEV-1 (Critical) — potential tampering  | Immediate hold; quarantine assessment; incident escalation; Preservation Bundle                                  |
| BRK-PROV-003 | Manufacturer identity mismatch       | CPO manufacturer_id does not match the manufacturer credential presented in the PAES; or manufacturer credential fails verification | SEV-1 (Critical) — potential counterfeit  | Immediate hold; quarantine; counterfeit investigation protocol; regulatory notification per institutional policy |
| BRK-PROV-004 | Batch/lot reference discrepancy      | Physical product batch/lot reference does not match the provenance manifest   | SEV-2 (High)  | Hold-only containment; manufacturer investigation; may resolve as labeling error (see worked example 15.1) or    |

| Break Code   | Break Name                          | Detection Criteria  | Default Severity  | Containment Response  |
|--------------|-------------------------------------|---|---|---|
|              |                                     | batch/lot reference (labeling vs. electronic record)  |   | escalate to counterfeit investigation   |
| BRK-PROV-005 | Duplicate unit identifier           | Two or more distinct products in the custody chain claim the same unit-level identifier (serial number collision)         | SEV-1 (Critical) — potential counterfeit or system error  | Immediate hold on all units claiming the identifier; incident investigation; regulatory notification if counterfeit suspected |
| BRK-PROV-006 | Aggregation hierarchy break         | Child product unit cannot be traced to parent aggregation level (package, case, pallet) through content-addressed linkage | SEV-3 (Moderate) if isolated; SEV-2 if pattern affects multiple units                           | Hold-only on affected units; aggregation chain investigation; potential repackaging authority review                          |
| BRK-PROV-007 | Provenance manifest unavailable     | Content-addressed provenance manifest cannot be retrieved from storage for a product requiring authenticity verification  | SEV-2 (High)  | Hold-only containment; storage availability incident; recovery from replicated storage per Baseline C procedures              |
| BRK-PROV-008 | Storage condition gap in provenance | Provenance chain shows a storage period without corresponding condition monitoring records                                | SEV-3 (Moderate) if short gap and standard product; SEV-2 if cold-chain product or extended gap | Hold-only if product is condition-sensitive; storage evidence refresh required before release                                 |

**Provenance Break Resolution Pathways:**

| Resolution Type  | Applicable Break Codes     | Resolution Evidence  | Post-Resolution State  |
|--|----------------------------|--|--|
| Manufacturer correction (labeling / documentation error) | BRK-PROV-004               | Manufacturer correction attestation; corrected documentation; quality assessment confirming no product impact          | PROV_RECONSTRUCTED; EP Delta generated                                     |
| Gap investigation — compensating evidence obtained       | BRK-PROV-001, BRK-PROV-008 | Investigation report; compensating evidence (transport records, third-party attestation, retrospective condition data) | PROV_RECONSTRUCTED; gap documented with compensating evidence              |
| Counterfeit confirmed                                    | BRK-PROV-003, BRK-PROV-005 | Investigation report confirming counterfeit; regulatory notification record; quarantine/destruction evidence           | AUTH_FAILED; product removed from supply chain; Preservation Bundle sealed |

| Resolution Type                                | Applicable Break Codes | Resolution Evidence   | Post-Resolution State   |
|--|------------------------|---|---|
| Storage recovery — manifest restored           | BRK-PROV-007           | Storage recovery log; restored manifest integrity verification; availability incident investigation | PROV state restored to pre-incident value; availability incident documented           |
| Integrity failure — tampered record identified | BRK-PROV-002           | Forensic investigation report; valid version restoration from backup; tamper evidence preserved     | PROV_RECONSTRUCTED if valid version exists; escalation to governance if unrecoverable |

### C.3 Authorization Break Taxonomy (BRK-AUTH)

| Break Code   | Break Name   | Detection Criteria   | Default Severity  | Containment Response  |
|--------------|--|--|---|---|
| BRK-AUTH-001 | Dispensation bound to expired authorization                  | Reconciliation detects a completed or pending dispensation event referencing an authorization whose validity state = RX_EXPIRED at dispensation time | SEV-2 (High) if dispensation already completed; SEV-3 if dispensation pending (can be corrected)                                      | Pending dispensation: hold. Completed dispensation: post-dispensation review; patient notification assessment                               |
| BRK-AUTH-002 | Dispensation bound to revoked authorization                  | Dispensation references an authorization with validity state = RX_REVOKED; revocation preceded dispensation  | SEV-1 (Critical)  | Immediate investigation; patient safety assessment; incident escalation; Preservation Bundle  |
| BRK-AUTH-003 | Issuer credential expired at authorization time              | AES shows issuer legitimacy = ISSU_EXPIRED at the timestamp of the authorization event   | SEV-2 (High)  | Hold on pending dispensation under affected authorization; investigation of authorization validity  |
| BRK-AUTH-004 | Issuer credential revoked — active prescriptions outstanding | Credentialing body revokes issuer; reconciliation identifies active (non-expired, non-superseded) prescriptions from revoked issuer                  | SEV-2 (High)  | All active prescriptions flagged for review; pending dispensation held; institutional process for prescription transfer or re-authorization |
| BRK-AUTH-005 | Scope mismatch — authorization bounds exceeded               | Dispensation parameters (product, quantity, location, purpose) do not match authorization bounds documented in AES                                   | SEV-2 (High) if material mismatch; SEV-3 if minor (e.g., dispensation location different from authorized but within same institution) | Hold on dispensation; scope-match investigation; may resolve with documented override or escalate as unauthorized dispensation              |
| BRK-AUTH-006 | Supersession chain ambiguity                                 | Multiple prescriptions for the same scope claim  | SEV-2 (High)  | Hold on all affected prescriptions; Tier 1  |

| Break Code   | Break Name                               | Detection Criteria   | Default Severity  | Containment Response   |
|--------------|--|--|---|--|
|              |  | RX_VALID status; current-reference state cannot be determined from the supersession chain  |   | supersession chain review; determination of authoritative current-reference                                |
| BRK-AUTH-007 | Delegation instrument expired or revoked | Dispensation executed under delegated authority; delegation instrument expired or delegator AES shows revocation at delegation time      | SEV-2 (High)  | Post-dispensation review for completed events; hold on future delegated actions pending delegation renewal |
| BRK-AUTH-008 | Authorization freshness exceeded         | AES currency_check_timestamp exceeds the applicable freshness window for the authority type; dispensation proceeds on stale verification | SEV-3 (Moderate) if freshness exceeded by <50% of window; SEV-2 if exceeded by >50% | Re-verification required before next dispensation; investigation of freshness monitoring process           |

#### Authorization Break Resolution Pathways:

| Resolution Type                               | Applicable Break Codes                                 | Resolution Evidence  | Post-Resolution State  |
|---|--|--|--|
| Re-authorization by same or substitute issuer | BRK-AUTH-001, BRK-AUTH-003, BRK-AUTH-004, BRK-AUTH-007 | New authorization or renewal issued by authorized issuer; AES confirmed for new authorization  | Pending dispensation proceeds under new authorization; EP Delta documenting break and re-authorization         |
| Scope correction                              | BRK-AUTH-005   | Scope verification identifies error in dispensation parameters or authorization bounds; correction EP Delta generated                | Authorization confirmed valid with corrected scope documentation   |
| Supersession chain repair                     | BRK-AUTH-006   | Investigation determines correct current-reference; EP Delta resolves ambiguity; non-current prescriptions marked SUPERSEDED         | Single current-reference state established; hold released  |
| Unauthorized dispensation confirmed           | BRK-AUTH-002   | Investigation confirms dispensation occurred under revoked authorization; patient safety assessment; institutional corrective action | Preservation Bundle sealed; liability trigger event documented; corrective action per institutional governance |

#### C.4 Custody Break Taxonomy (BRK-CUST)

| Break Code   | Break Name        | Detection Criteria        | Default Severity | Containment Response  |
|--------------|-------------------|---------------------------|------------------|-----------------------|
| BRK-CUST-001 | Unmatched handoff | CUS_HANDOFF record exists | SEV-2 (High)     | Hold-only on affected |

| <b>Break Code</b> | <b>Break Name</b>                                 | <b>Detection Criteria</b>  | <b>Default Severity</b>  | <b>Containment Response</b>  |
|-------------------|---|--|--|--|
|                   | — sender confirms, receiver does not              | but no matching CUS_RECEIPT within expected timeframe  | — product location uncertain   | units; investigation of receiving entity; transport chain review   |
| BRK-CUST-002      | Unauthorized custody event — unrecognized actor   | Custody event logged by actor whose credential cannot be verified against authorized custodian registry            | SEV-1 (Critical)   | Immediate hold; incident escalation; Preservation Bundle; potential unauthorized access investigation                    |
| BRK-CUST-003      | Storage excursion unassessed                      | CUS_TEMP_EXCURSION event logged without corresponding excursion assessment record within SLA                       | SEV-3 (Moderate) for minor excursion; SEV-2 for moderate or severe excursion | Hold-only until excursion assessment completed; product quality review   |
| BRK-CUST-004      | Quantity discrepancy at handoff                   | CUS_RECEIPT quantity does not match CUS_HANDOFF quantity for the same transfer                                     | SEV-3 if <1% variance; SEV-2 if 1–5% variance; SEV-1 if >5% variance         | Investigation of discrepancy; transport chain review; potential loss or diversion assessment                             |
| BRK-CUST-005      | Product identity mismatch at receipt              | CUS_RECEIPT product verification shows CPO mismatch with handoff documentation                                     | SEV-1 (Critical) — potential substitution                                    | Immediate hold; return to sender or quarantine; counterfeit/substitution investigation                                   |
| BRK-CUST-006      | Custody chain exceeds maximum age without refresh | Most recent custody event for product exceeds the freshness threshold for the product category without a new event | SEV-3 (Moderate) if within 2x threshold; SEV-2 if beyond 2x threshold        | Re-verification required; manual custody confirmation per Section 6.4  |
| BRK-CUST-007      | Repackaging without authorized entity credential  | CUS_REPACKAGE event logged by entity without documented repackaging authorization                                  | SEV-2 (High)   | Hold on repackaged units; repackaging authority investigation; potential product integrity assessment                    |
| BRK-CUST-008      | Recall acknowledgment overdue                     | CUS_RECALL_ACK not received from notified custody holder within recall acknowledgment SLA                          | SEV-2 (High) — recalled product may remain in dispensable inventory          | Escalation to recall authority; direct outreach to custody holder; regulatory notification if SLA significantly exceeded |

## C.5 Safety Evidence Break Taxonomy (BRK-SAFE)

| Break Code   | Break Name  | Detection Criteria   | Default Severity   | Containment Response  |
|--------------|---|--|--|---|
| BRK-SAFE-001 | Required evidence class absent at dispensation                | Dispensation completed without one or more required safety evidence classes per Section 7.2 matrix   | SEV-2 (High) for high-impact classes (DS-01, DS-02); SEV-3 for supplementary classes                       | Post-dispensation review for completed events; hold on future dispensation until evidence generated                 |
| BRK-SAFE-002 | Safety evidence stale at dispensation                         | Safety evidence class generated against a source data version that was superseded before dispensation occurred   | SEV-3 (Moderate) if supersession is minor update; SEV-2 if supersession involves new safety information    | Re-assessment required before next dispensation; investigation of freshness monitoring                              |
| BRK-SAFE-003 | Safety alert overridden without documentation                 | SAFETY_ALERT_OVERRIDDEN event without corresponding DS-05 (prescriber clinical rationale) evidence   | SEV-2 (High) — accountability gap  | Post-dispensation review; retrospective DS-05 documentation required; institutional governance notification         |
| BRK-SAFE-004 | Decision-support algorithm version deprecated                 | Context-bound decision state references a CDSS algorithm version that has been deprecated or recalled by the system vendor                                       | SEV-3 (Moderate) if deprecated version produces equivalent results; SEV-2 if deprecated due to known error | Inventory of decisions relying on deprecated version; assessment of whether version change affects clinical outputs |
| BRK-SAFE-005 | Conflicting safety evidence classes                           | Two or more safety evidence classes produce contradictory assessments (e.g., DS-01 flags contraindication; dispensation proceeds without override documentation) | SEV-2 (High)   | SAFE_DISPUTED state triggered; hold on future dispensation; clinical review required                                |
| BRK-SAFE-006 | Product safety profile updated post-dispensation — pre-refill | Manufacturer issues safety update for product; active prescriptions exist for the product; next refill has not yet incorporated updated safety information       | SEV-3 (Moderate)   | Prescriber notification required; refill blocked until SES refreshed with updated PS-01/PS-02                       |

## C.6 Claim / Reimbursement Break Taxonomy (BRK-CLAIM) — Optional

*Included only where Section 12 is in scope.*

| Break Code    | Break Name                          | Detection Criteria  | Default Severity | Containment Response   |
|---------------|-------------------------------------|---|------------------|--|
| BRK-CLAIM-001 | Claim without dispensation evidence | CLM_SUBMITTED references a dispensation event for which no DEP-H exists | SEV-2 (High)     | Claim pended (CLM_PENDED); dispensation evidence investigation |

| Break Code    | Break Name  | Detection Criteria   | Default Severity   | Containment Response   |
|---------------|---|--|--|--|
|               |   | or the DEP-H is integrity-failed   |  |  |
| BRK-CLAIM-002 | Claim references revoked authorization (pre-dispensation) | CLM_SUBMITTED references an authorization that was RX_REVOKED before the dispensation event occurred | SEV-1 (Critical) — unauthorized dispensation may have occurred | Claim denied; dispensation investigation; patient safety assessment; Preservation Bundle   |
| BRK-CLAIM-003 | Duplicate claim detected                                  | Two claims reference the same dispensation event with overlapping coverage                           | SEV-2 (High)   | Both claims held; investigation of duplication source                                      |
| BRK-CLAIM-004 | Payout without approved claim                             | Payment system records a payout without a corresponding CLM_APPROVED record                          | SEV-1 (Critical) — potential unauthorized payment              | Immediate investigation; recovery assessment; system control review                        |
| BRK-CLAIM-005 | Payout amount mismatch                                    | CLM_PAID amount differs from CLM_APPROVED amount beyond defined tolerance                            | SEV-3 if within rounding tolerance; SEV-2 if material          | Adjustment (CLM_ADJUSTED) for amount correction; investigation for systemic pricing errors |
| BRK-CLAIM-006 | Orphaned adjustment                                       | CLM_ADJUSTED record exists without corresponding original CLM_PAID                                   | SEV-2 (High)   | Investigation of adjustment origin; correction or reversal per determination               |

### C.7 Integrity Break Taxonomy (BRK-INTEG)

| Break Code    | Break Name                           | Detection Criteria   | Default Severity  | Containment Response  |
|---------------|--------------------------------------|--|---|---|
| BRK-INTEG-001 | Content-address verification failure | Computed hash of retrieved artifact does not match stored content address                        | SEV-1 (Critical) — potential tampering or corruption            | Immediate hold on dependent states; artifact recovery from replicated storage; forensic investigation |
| BRK-INTEG-002 | Hash chain break in event sequence   | Previous_event_hash in an event record does not match the content_address of the preceding event | SEV-1 (Critical) — potential insertion, deletion, or reordering | Immediate hold on affected chain; forensic investigation; Preservation Bundle                         |
| BRK-INTEG-003 | Evidence artifact unavailable        | Content-addressed artifact referenced by a manifest cannot be retrieved from any storage replica | SEV-2 (High)  | Hold on dependent states; storage recovery procedures; evidence gap documented if unrecoverable       |

| Break Code    | Break Name                             | Detection Criteria  | Default Severity                        | Containment Response  |
|---------------|--|---|---|---|
| BRK-INTEG-004 | Manifest self-referential hash failure | Evidence pack manifest's computed hash does not match its declared manifest_content_address   | SEV-1 (Critical)                        | Manifest quarantined; all artifacts within the manifest re-verified individually; investigation of manifest corruption source |
| BRK-INTEG-005 | Silent overwrite detected              | Evidence artifact modified after storage without generating a correction EP Delta; detected through periodic hash verification or audit | SEV-1 (Critical) — governance violation | Immediate governance notification; liability trigger event LT-07; forensic investigation of modification source and scope     |

### C.8 Freshness Break Taxonomy (BRK-FRESH)

| Break Code    | Break Name                           | Detection Criteria  | Default Severity  | Containment Response  |
|---------------|--------------------------------------|---|---|---|
| BRK-FRESH-001 | Issuer credential verification stale | AES currency_check_timestamp exceeds freshness window for the authority type                              | SEV-3 (Moderate) if <50% beyond window; SEV-2 if >50%                     | Re-verification required before next downstream action  |
| BRK-FRESH-002 | Safety evidence source data outdated | Safety evidence class generated against source data version that has been superseded by a material update | SEV-3 or SEV-2 depending on materiality of update                         | Evidence refresh required; SES state may transition to SAFE_SUPERSEDED  |
| BRK-FRESH-003 | Custody evidence stale               | Most recent custody event exceeds product-category freshness threshold                                    | SEV-3 if <2x threshold; SEV-2 if >2x                                      | Manual custody re-verification required (Section 6.4 manual confirmation pathway)                                   |
| BRK-FRESH-004 | Revocation check stale               | Revocation check result was obtained beyond the acceptable freshness window for the transaction type      | SEV-3 (Moderate); SEV-2 for high-risk transactions                        | Re-check required before relying on prior result; conservative FAIL treatment per Baseline D                        |
| BRK-FRESH-005 | Reconciliation execution overdue     | Reconciliation cycle not executed within the defined cadence for the reconciliation type                  | SEV-3 if one cycle missed; SEV-2 if two or more consecutive cycles missed | Reconciliation execution required; investigation of monitoring process; governance notification if pattern persists |

### C.9 Severity Assessment Decision Logic

When a break is detected, severity is assessed using the following decision tree:

Step 1: Identify break code from taxonomy (C.2 through C.8)

Step 2: Assess base severity from taxonomy table

Step 3: Apply aggravating factors (each may escalate severity by one level):

- Product is narrow therapeutic index, biologic, or controlled substance
- Break affects multiple products or multiple custody holders
- Break is recurrent (same break code detected 3+ times in 30 days for the same scope)
- Break was not detected by automated reconciliation but by manual review or external report
- Break involves a product subject to active recall or safety alert

Step 4: Apply mitigating factors (each may de-escalate severity by one level, but never below SEV-3):

- Break is isolated to a single product unit with no downstream dispensation
- Break was detected proactively (automated reconciliation) before any downstream action
- Compensating evidence is immediately available and confirms no impact
- Break is attributable to a known, documented, and transient system issue (e.g., scheduled maintenance window)

Step 5: Final severity = Base severity adjusted by net aggravating/mitigating factors

(minimum SEV-4; maximum SEV-1)

Step 6: Log severity assessment with factors documented in break detection record

**Severity Override.** Institutional governance may override the assessed severity with documented justification. Overrides that reduce severity require dual authorization. Overrides that increase severity require single authorization. All overrides are logged as ILS records.

---

## C.10 Break Lifecycle Summary

Every break, regardless of type or severity, follows this lifecycle:

| Lifecycle Stage | ILS Event    | Key Actions         | SLA (Default) |
|-----------------|--------------|---------------------|---------------|
| DETECTED        | BRK_DETECTED | Break identified by | Immediate (at |

| <b>Lifecycle Stage</b> | <b>ILS Event</b>    | <b>Key Actions</b>   | <b>SLA (Default)</b>   |
|------------------------|---------------------|--|--|
|                        |                     | reconciliation execution; severity assessed; break record generated                                | reconciliation)  |
| CONTAINED              | BRK_CONTAINED       | Hold-only containment applied per severity; affected scope identified; investigation assigned      | SEV-1: 15 min; SEV-2: 1 hour; SEV-3: 4 hours; SEV-4: next reconciliation cycle |
| INVESTIGATED           | BRK_INVESTIGATED    | Root cause analysis; evidence gathering; determination of authoritative state; correction proposal | SEV-1: 48 hours; SEV-2: 5 days; SEV-3: 10 days; SEV-4: 30 days                 |
| RESOLVED               | BRK_RESOLVED        | Correction or compensating evidence applied; post-correction reconciliation confirms alignment     | Per investigation findings   |
| CLOSED                 | BRK_CLOSED          | Resolution verified; hold released; break record sealed with complete evidence chain               | Within 24 hours of resolution verification                                     |
| RECERT_CHECK           | BRK_RECERT_ASSESSED | Governance assessment of whether break warrants recertification trigger or control improvement     | Within 10 business days of closure   |

# Appendix D — Standard Checks Pack (Full List)

## D.1 Purpose and Structure

The Standard Checks Pack provides a comprehensive list of examiner and reviewer checks covering all operational domains of the framework. Each check is a discrete, repeatable verification that produces a PASS, FAIL, or NOT\_APPLICABLE result with documented evidence references.

### Check Structure Convention:

Each check includes:

- **Check ID:** Unique identifier using domain prefix and sequence number.
- **Check Purpose:** The operational control or evidence condition being verified.
- **Evidence Required:** Specific evidence artifacts, logs, or records needed to perform the check.
- **Pass Criteria:** Conditions that must be met for a satisfactory finding.
- **Fail Criteria:** Conditions indicating a deficiency requiring remediation or escalation.
- **Risk Rating:** Low, Moderate, High, or Critical — indicating the impact if a control failure is detected.

Checks are organized by domain. Section 14 presented a representative subset of checks; this appendix provides the complete pack.

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## D.2 Product Authenticity Checks (AUTH-series)

| Check ID | Check Purpose  | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| AUTH-001 | Verify CPO exists for all products in dispensation scope           | 100% of dispensed products have CPO with valid content address                                | High        |
| AUTH-002 | Verify manufacturer identity evidence current per freshness window | All manufacturer credentials verified within applicable freshness window at dispensation time | High        |
| AUTH-003 | Verify provenance manifest completeness for sampled products       | Sampled provenance manifests show PROV_COMPLETE; no unresolved gaps                           | Critical    |
| AUTH-004 | Verify content-addressed integrity of provenance chain             | 100% hash chain verifications pass for sampled products                                       | Critical    |
| AUTH-005 | Verify authenticity state accurately reflects evidence             | AUTH_VERIFIED only where all PAES elements present, current, and consistent                   | High        |
| AUTH-006 | Verify authenticity assessment performed before dispensation       | No dispensation events for products in AUTH_NOT_ASSESSED state                                | High        |
| AUTH-007 | Verify PAES manifests are content-addressed and retrievable        | Sampled PAES manifests retrievable by content address; integrity verification passes          | High        |
| AUTH-008 | Verify product identity verification performed at each CUS_RECEIPT | Sampled receipt events include product identity verification result                           | Moderate    |
| AUTH-009 | Verify CPO correction EP Deltas generated for all CPO changes      | No CPO modifications without corresponding EP Delta record                                    | Critical    |
| AUTH-010 | Verify manufacturer credential                                     | Revocation check logged for manufacturer  | High        |

| Check ID | Check Purpose                              | Pass Criteria                           | Risk Rating |
|----------|--|---|-------------|
|          | revocation check performed at dispensation | credential at each sampled dispensation |             |

### D.3 Provenance and Custody Checks (PROV-series)

| Check ID | Check Purpose   | Pass Criteria  | Risk Rating   |
|----------|---|--|---------------|
| PROV-001 | Verify custody event chain completeness for sampled products      | No undocumented custody gaps in sampled chains   | High          |
| PROV-002 | Verify handoff confirmation from both sender and receiver         | All sampled handoffs have matching sender/receiver confirmation pairs  | High          |
| PROV-003 | Verify storage condition monitoring active during storage periods | Continuous condition records present for all storage periods in sample   | Moderate–High |
| PROV-004 | Verify repackaging events authorized                              | All CUS_REPACKAGE events linked to authorized repackager credential  | High          |
| PROV-005 | Verify aggregation hierarchy maintained                           | All sampled child units traceable to parent aggregation level  | Moderate      |
| PROV-006 | Verify custody chain integrity at recall scope determination      | All affected units identified through aggregation hierarchy; all current custodians notified   | Critical      |
| PROV-007 | Verify excursion records have corresponding assessments           | All CUS_TEMP_EXCURSION events have excursion assessment within SLA   | Moderate      |
| PROV-008 | Verify custody event attributes complete per minimum requirements | All sampled custody events include required minimum fields (event_id, timestamp, actor, product reference, outcome, integrity_hash, previous_event_hash) | High          |
| PROV-009 | Verify custody chain cross-references provenance manifest         | Sampled custody events linked to provenance manifest events for the same product   | Moderate      |
| PROV-010 | Verify no custody events by unauthorized actors                   | All sampled custody event actor_ids verified against authorized custodian registry   | Critical      |
| PROV-011 | Verify storage condition baselines defined for product categories | All product categories with condition-sensitive products have documented storage condition baselines   | Moderate      |
| PROV-012 | Verify destruction events properly documented                     | All CUS_DESTRUCTION events have authorization record, witness documentation, and disposal evidence   | High          |

### D.4 Authorization and Issuer Legitimacy Checks (ISSU-series)

| Check ID | Check Purpose                                      | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| ISSU-001 | Verify issuer legitimacy confirmed at dispensation | All sampled dispensation events linked to AES with ISSU_CONFIRMED | Critical    |
| ISSU-002 | Verify authorization freshness at                  | Issuer credential verified within applicable                      | High        |

| Check ID | Check Purpose  | Pass Criteria  | Risk Rating |
|----------|--|--|-------------|
|          | dispensation time  | freshness window at dispensation   |             |
| ISSU-003 | Verify revocation check performed at dispensation                      | Revocation check logged for each sampled dispensation; CLEAR result or appropriate handling for non-CLEAR          | Critical    |
| ISSU-004 | Verify scope-match between authorization and dispensation              | Authorization bounds (product, quantity, location, purpose) match dispensation parameters                          | High        |
| ISSU-005 | Verify supersession chain integrity for multi-version authorizations   | Ordered chain; no ambiguous current-reference state; dispensation bound to current version                         | High        |
| ISSU-006 | Verify delegation authority where delegated prescribing applies        | Delegation instrument current; delegator authority verified; delegation scope matches action                       | High        |
| ISSU-007 | Verify expired authorizations do not support new dispensation          | No dispensation events referencing authorization in RX_EXPIRED state at dispensation time                          | High        |
| ISSU-008 | Verify revoked authorizations trigger hold on pending dispensation     | All pending dispensation under revoked authorizations held or cancelled  | Critical    |
| ISSU-009 | Verify AES generated and content-addressed for all authorizations      | Sampled authorizations have complete AES with content-addressed integrity  | High        |
| ISSU-010 | Verify authorization EP Deltas generated for all lifecycle transitions | Each sampled authorization state change (renewal, revocation, supersession, suspension) has corresponding EP Delta | High        |
| ISSU-011 | Verify quantity bound tracking across partial dispensation             | Accumulated dispensation quantity tracked against authorization quantity bound; threshold breach triggers hold     | Moderate    |
| ISSU-012 | Verify emergency authorizations subject to post-hoc review             | All emergency authorizations reviewed within institutional SLA; review records documented                          | High        |

## D.5 Dispensation Integrity Checks (DISP-series)

| Check ID | Check Purpose  | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| DISP-001 | Verify all dispensation precondition gates evaluated           | All sampled dispensation events have complete gate completion record (G1–G7)                              | Critical    |
| DISP-002 | Verify no gate bypass without documented override              | No dispensation where any gate = FAIL without documented override and Exceptional review posture          | Critical    |
| DISP-003 | Verify dispensation evidence record generated for each release | All sampled CUS_DISPENSATION events have corresponding DEP-H manifest                                     | High        |
| DISP-004 | Verify DEP-H cross-references PAES, AES, CES, SES              | Sampled DEP-H manifests contain valid content-addressed references to all required upstream evidence sets | High        |

| Check ID | Check Purpose  | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| DISP-005 | Verify dispensing entity credential active at dispensation | Dispensing entity credential verified and non-revoked at each sampled dispensation event          | High        |
| DISP-006 | Verify partial dispensation quantity tracking accurate     | For multi-fill prescriptions: accumulated quantity matches sum of individual dispensation records | Moderate    |
| DISP-007 | Verify hold-only containment prevents dispensation         | No dispensation events for products in HOLD_HELD, HOLD_QUARANTINED, or HOLD_RECALLED state        | Critical    |
| DISP-008 | Verify dispensation evidence retention per policy          | Sampled DEP-H manifests present in storage per retention metadata; no premature destruction       | High        |

## D.6 Proof-of-Safety Checks (SAFE-series)

| Check ID | Check Purpose   | Pass Criteria   | Risk Rating |
|----------|---|---|-------------|
| SAFE-001 | Verify required safety evidence classes present at dispensation       | All required classes per Section 7.2 matrix present for sampled events  | High        |
| SAFE-002 | Verify safety evidence currency at dispensation time                  | Evidence classes current relative to source data version at dispensation time   | High        |
| SAFE-003 | Verify safety alert overrides documented                              | All overrides linked to DS-05 with documented justification   | Critical    |
| SAFE-004 | Verify context-bound decision state records for high-impact decisions | High-impact decisions have complete context-bound decision state records with all required fields   | High        |
| SAFE-005 | Verify decision state replay capability                               | Sampled decision states can be independently reconstructed from evidence references   | High        |
| SAFE-006 | Verify superseded safety evidence triggers appropriate action         | No dispensation relying on superseded safety evidence without refresh   | High        |
| SAFE-007 | Verify SES manifests generated and content-addressed                  | Sampled dispensation events have corresponding SES manifest with valid content address  | High        |
| SAFE-008 | Verify review posture correctly classified                            | Sampled decisions classified as Standard, Enhanced, or Exceptional per Section 7.4 criteria; no under-classification                                | Moderate    |
| SAFE-009 | Verify algorithm version tracking in decision state records           | Decision state records reference specific algorithm/database versions; version references are valid and retrievable                                 | Moderate    |
| SAFE-010 | Verify manual confirmation pathway properly documented                | All manual safety confirmations (Section 7.6) have qualified assessor credential, manual assessment record, and Enhanced/Exceptional review posture | High        |

## D.7 Recall, Quarantine, and Correction Checks (RCLL-series)

| Check ID | Check Purpose  | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| RCLL-001 | Verify recall scope determination complete           | All affected units identified; all current custody holders notified   | Critical    |
| RCLL-002 | Verify recall acknowledgment tracking                | All notified custody holders acknowledged within SLA  | High        |
| RCLL-003 | Verify recalled products quarantined                 | All identified affected units quarantined, returned, or destroyed with evidence                               | Critical    |
| RCLL-004 | Verify corrections generate EP Deltas                | All corrections produce EP Deltas with prior state preserved  | Critical    |
| RCLL-005 | Verify correction approval chain documented          | All material corrections approved by appropriate authority per RACI   | High        |
| RCLL-006 | Verify downstream propagation of corrections         | All downstream events affected by correction identified and addressed   | High        |
| RCLL-007 | Verify recall closure reconciliation                 | Recall closure report shows all affected units accounted for; open items = 0 or governance-approved exception | Critical    |
| RCLL-008 | Verify no silent overwrites in evidence chain        | Periodic hash verification confirms no artifact modification without EP Delta                                 | Critical    |
| RCLL-009 | Verify quarantine segregation verification           | All CUS_QUARANTINE_ENTRY events have segregation verification evidence  | High        |
| RCLL-010 | Verify hold release requires documented resolution   | All CUS_HOLD_RELEASE events have resolution evidence and approval chain                                       | High        |
| RCLL-011 | Verify supersession chains complete and unambiguous  | Sampled supersession chains are ordered; single current-reference state determinable; no orphaned versions    | High        |
| RCLL-012 | Verify historical states preserved non-destructively | Sampled corrected, superseded, and revoked records accessible via original content address                    | Critical    |

## D.8 Reconciliation and Evidence Integrity Checks (RECON-series)

| Check ID  | Check Purpose  | Pass Criteria   | Risk Rating |
|-----------|--|---|-------------|
| RECON-001 | Verify reconciliation executed per cadence matrix                | All reconciliation types executed within defined cadence; no overdue cycles | High        |
| RECON-002 | Verify break detection records generated for all detected breaks | All breaks have BRK_DETECTED ILS records with severity assessment           | High        |
| RECON-003 | Verify break containment applied per severity SLA                | All SEV-1 and SEV-2 breaks have containment evidence within SLA             | Critical    |
| RECON-004 | Verify break resolution within SLA                               | Break resolution times within SLA for each severity band                    | High        |
| RECON-005 | Verify break lifecycle   | Sampled breaks show complete lifecycle                                      | High        |

| Check ID  | Check Purpose   | Pass Criteria  | Risk Rating |
|-----------|---|--|-------------|
|           | completeness  | (DETECTED → CONTAINED → INVESTIGATED → RESOLVED → CLOSED)  |             |
| RECON-006 | Verify open breaks register maintained                      | Open breaks register current; all unresolved breaks tracked with aging                               | Moderate    |
| RECON-007 | Verify content-addressed storage integrity                  | Periodic hash verification executed per schedule; no unresolved integrity failures                   | Critical    |
| RECON-008 | Verify evidence chain-of-custody maintained                 | All evidence access, export, and transfer events documented per Section 9.4                          | High        |
| RECON-009 | Verify evidence retrieval within SLO                        | Sampled evidence retrieval requests responded within target response times                           | Moderate    |
| RECON-010 | Verify reconciliation reports content-addressed and chained | Sampled reconciliation reports have valid content address; chain linkage to preceding report intact  | High        |
| RECON-011 | Verify Preservation Bundles generated per trigger criteria  | All trigger events (Section 9.7) have corresponding Preservation Bundle                              | High        |
| RECON-012 | Verify legal hold capability functional                     | Legal hold activation and deactivation tested per governance schedule; retention overrides confirmed | Moderate    |

### D.9 Tiered Access Compliance Checks (ACCS-series)

| Check ID | Check Purpose   | Pass Criteria  | Risk Rating |
|----------|---|--|-------------|
| ACCS-001 | Verify all Tier 2 access events have dual-control approval    | 100% of Tier 2 events have documented dual-control approval with independent approvers | Critical    |
| ACCS-002 | Verify TTL enforcement for Tier 1 and Tier 2 access           | All access grants expired at TTL; no access beyond TTL without documented renewal      | High        |
| ACCS-003 | Verify post-access review completion for Tier 2 events        | All Tier 2 events have completed PARP within 5-business-day SLA                        | High        |
| ACCS-004 | Verify purpose limitation compliance                          | Evidence accessed consistent with documented purpose code; no scope creep              | High        |
| ACCS-005 | Verify minimization and redaction in evidence pack exports    | Prohibited data elements redacted; minimization applied; redaction logged              | High        |
| ACCS-006 | Verify Tier 0 outputs contain no individual-identifiable data | Sampled Tier 0 outputs contain aggregate statistics only                               | High        |
| ACCS-007 | Verify Tier 1 uses pseudonymized references                   | Sampled Tier 1 evidence extracts use pseudonymized actor and subject references        | High        |
| ACCS-008 | Verify Tier 2 objective triggers documented                   | All Tier 2 access requests reference predefined objective trigger criteria             | Critical    |
| ACCS-009 | Verify emergency access procedures followed                   | Emergency Tier 2 access events have expedited approval and post-hoc                    | High        |

| Check ID | Check Purpose                        | Pass Criteria   | Risk Rating |
|----------|--------------------------------------|---|-------------|
|          |                                      | documentation within 24 hours   |             |
| ACCS-010 | Verify access event logging complete | All access events at all tiers logged as ILS records with required minimum fields | High        |

### D.10 Governance, Recertification, and Accountability Checks (GOVN-series)

| Check ID | Check Purpose   | Pass Criteria  | Risk Rating |
|----------|---|--|-------------|
| GOVN-001 | Verify recertification completed per cadence                              | All recertification cycles completed on schedule; no overdue recertifications  | High        |
| GOVN-002 | Verify material change triggers documented and responded to               | All material change triggers logged; governance response documented within SLA   | High        |
| GOVN-003 | Verify no-master-key posture maintained                                   | All material governance actions have multi-party approval; no single-party override detected                                   | Critical    |
| GOVN-004 | Verify RACI accountability for critical activities                        | Sampled activities executed per RACI assignments; accountability documented  | High        |
| GOVN-005 | Verify liability trigger catalog maintained and current                   | Catalog current; all trigger events logged and responded to per catalog  | High        |
| GOVN-006 | Verify change control procedures followed for framework changes           | All changes to operational standards, reconciliation cadences, or evidence requirements processed through Change Control Board | High        |
| GOVN-007 | Verify governance meeting records documented                              | Steering Committee and Change Control Board meetings documented with decisions and action items                                | Moderate    |
| GOVN-008 | Verify delegation controls maintained                                     | All delegation records current; expired delegations revoked; delegation chains within governance limits                        | High        |
| GOVN-009 | Verify accountability records generated for all corrections and overrides | All corrections, overrides, recalls, and supersession events have accountability records per Section 11.9                      | High        |
| GOVN-010 | Verify incident escalation SLAs met                                       | Sampled incidents escalated within SLA per severity classification   | High        |

### D.11 Offboarding Checks (OFFB-series)

| Check ID | Check Purpose  | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| OFFB-001 | Verify final state snapshot generated and integrity-verified | Snapshot complete; master hash verified; officer attestation present      | High        |
| OFFB-002 | Verify final reconciliation executed and documented          | All reconciliation types executed; results documented; breaks inventoried | High        |

| Check ID | Check Purpose                                | Pass Criteria   | Risk Rating |
|----------|--|---|-------------|
| OFFB-003 | Verify open breaks disclosed                 | All unresolved breaks disclosed; governance approved offboarding with open breaks (if any)                      | Critical    |
| OFFB-004 | Verify legacy transition manifest complete   | All evidence types mapped; data loss documented; non-mappable artifacts archived                                | High        |
| OFFB-005 | Verify post-transfer verification completed  | Legacy system records match framework evidence at transition point  | High        |
| OFFB-006 | Verify archival retention applied            | All evidence archived per retention requirements; no premature destruction                                      | High        |
| OFFB-007 | Verify pre-offboarding requirements met      | All active holds resolved or transferred; all open breaks resolved or disclosed; governance approval documented | High        |
| OFFB-008 | Verify post-offboarding monitoring initiated | Monitoring schedule established; open break tracking active; archival integrity verification scheduled          | Moderate    |

## D.12 Claim / Reimbursement Checks (CLM-series) — Optional

*Included only where Section 12 is in scope.*

| Check ID | Check Purpose   | Pass Criteria  | Risk Rating |
|----------|---|--|-------------|
| CLM-001  | Verify claim evidence gates evaluated at validation   | All sampled claims have complete gate results (CG-1 through CG-6)                        | High        |
| CLM-002  | Verify temporal evidence assessment applied           | Authorization validity assessed at dispensation time, not claim time, for sampled claims | High        |
| CLM-003  | Verify claim-dispensation linkage intact              | All sampled claims reference a valid, content-addressed dispensation event               | High        |
| CLM-004  | Verify no duplicate payouts                           | No duplicate CLM_PAID events for any single CLM_APPROVED                                 | Critical    |
| CLM-005  | Verify post-payment adjustments documented            | All CLM_ADJUSTED records have reason, amount delta, and upstream change reference        | High        |
| CLM-006  | Verify open breaks register maintained for claims     | Open breaks register for claims current; all unresolved items tracked with aging         | Moderate    |
| CLM-007  | Verify claim denial includes appeal pathway           | All CLM_DENIED records document reason code and appeal pathway                           | Moderate    |
| CLM-008  | Verify payout settlement confirmation linked to claim | All CLM_PAID events have settlement confirmation with payment reference and amount       | High        |

### D.13 Summary Statistics

| Domain                           | Check Series              | Check Count | Critical  | High      | Moderate  |
|----------------------------------|---------------------------|-------------|-----------|-----------|-----------|
| Product Authenticity             | AUTH-001 to AUTH-010      | 10          | 2         | 7         | 1         |
| Provenance and Custody           | PROV-001 to PROV-012      | 12          | 2         | 7         | 3         |
| Authorization and Legitimacy     | ISSU-001 to ISSU-012      | 12          | 2         | 9         | 1         |
| Dispensation Integrity           | DISP-001 to DISP-008      | 8           | 3         | 4         | 1         |
| Proof-of-Safety                  | SAFE-001 to SAFE-010      | 10          | 1         | 7         | 2         |
| Recall and Correction            | RCLL-001 to RCLL-012      | 12          | 5         | 7         | 0         |
| Reconciliation and Integrity     | RECON-001 to<br>RECON-012 | 12          | 2         | 7         | 3         |
| Tiered Access Compliance         | ACCS-001 to ACCS-010      | 10          | 2         | 7         | 1         |
| Governance and<br>Accountability | GOVN-001 to GOVN-010      | 10          | 1         | 8         | 1         |
| Offboarding                      | OFFB-001 to OFFB-008      | 8           | 1         | 6         | 1         |
| Claims (Optional)                | CLM-001 to CLM-008        | 8           | 1         | 5         | 2         |
| <b>Total</b>                     |                           | <b>112</b>  | <b>22</b> | <b>74</b> | <b>16</b> |

# Appendix E — Reviewer / Examiner Query Pack (Expanded; Conceptual SQL / Pseudocode / Retrieval Logic)

## E.1 Purpose and Usage

This appendix provides an expanded set of conceptual queries that reviewers, examiners, auditors, and institutional operators can adapt to their specific retrieval infrastructure. Queries are organized by examiner objective — the operational question the examiner needs answered — rather than by technical domain. Each query includes: the examiner question in plain language, the query family and ID, the evidence sources consulted, the conceptual retrieval logic, and the expected output format.

Section 14.9 provided 12 representative queries across 6 families. This appendix expands to 30 queries across 10 families, covering the full scope of examiner concerns.

**Implementation Note.** Queries are expressed in SQL-like pseudocode for clarity. Actual implementation will vary by storage technology, indexing approach, and access control layer. The pseudocode assumes relational-style access to ILS records, evidence manifests, and state tables; content-addressed retrieval is represented through hash-based lookups. Tiered access controls (Section 10) apply to all query execution — the query engine must enforce purpose limitation and TTL before returning results.

---

## E.2 Query Family 1: Product Authenticity and Provenance Verification

### EQP-001: What is the current authenticity state of a specific product?

Examiner question: "Show me the authenticity evidence for product [CPO reference]."

```
SELECT p.cpo_content_address, p.product_reference_id,
       p.batch_lot_reference, p.authenticity_state,
       p.state_determination_timestamp,
       pm.chain_status AS provenance_status,
       pm.event_count, pm.last_event_hash,
       mfr.legitimacy_state AS manufacturer_state,
       mfr.freshness_status AS manufacturer_freshness
FROM product_authenticity_states p
JOIN provenance_manifests pm
  ON p.cpo_content_address = pm.cpo_reference
LEFT JOIN authorization_evidence_sets mfr
  ON p.manufacturer_credential_ref = mfr.evidence_content_address
WHERE p.cpo_content_address = :target_cpo
ORDER BY p.state_determination_timestamp DESC
```

LIMIT 1;

Expected output: Single row with authenticity state, provenance chain status, manufacturer credential status, and freshness indicators.

---

**EQP-002: Show all products with unresolved provenance breaks in a date range.**

Examiner question: "How many products have provenance issues right now?"

```
SELECT rb.break_id, rb.break_code, rb.severity,
       rb.detected_at, rb.lifecycle_status,
       rb.affected_product_cpo,
       EXTRACT(DAY FROM CURRENT_TIMESTAMP - rb.detected_at) AS age_days,
       rb.assigned_to
FROM reconciliation_breaks rb
WHERE rb.break_code LIKE 'BRK-PROV-%'
      AND rb.lifecycle_status NOT IN ('RESOLVED', 'CLOSED')
      AND rb.detected_at >= :period_start
      AND rb.detected_at <= :period_end
ORDER BY rb.severity, rb.detected_at;
```

Expected output: List of open provenance breaks with aging, severity, and assignment.

---

**EQP-003: Reconstruct the complete provenance chain for a product from manufacture to current custody.**

Examiner question: "Walk me through every custody transition for product [reference] from origin."

```
SELECT ce.event_id, ce.event_type, ce.timestamp,
       ce.actor_id, ce.product_cpo_reference,
       ce.previous_event_hash, ce.content_address,
       CASE WHEN ce.previous_event_hash = prev.content_address
            THEN 'CHAIN_INTACT'
            ELSE 'CHAIN_BREAK' END AS integrity_status
FROM custody_events ce
LEFT JOIN custody_events prev
      ON ce.previous_event_hash = prev.content_address
WHERE ce.product_cpo_reference = :target_cpo
ORDER BY ce.timestamp ASC;
```

Expected output: Ordered custody event timeline with integrity verification at each link.

---

## E.3 Query Family 2: Authorization and Prescription Lifecycle

### EQP-004: Show the full authorization lifecycle for a prescription.

Examiner question: "What happened to prescription [auth\_id] from issuance to current state?"

```
SELECT ed.delta_id, ed.change_type, ed.change_timestamp,
       ed.previous_state, ed.new_state,
       ed.change_authority, ed.change_evidence,
       ed.downstream_impact
FROM ep_deltas ed
WHERE ed.authorization_reference = :target_auth_id
ORDER BY ed.change_timestamp ASC;
```

Expected output: Chronological list of all state transitions with authority and evidence references.

---

### EQP-005: Identify all dispensation events that relied on a subsequently revoked authorization.

Examiner question: "After authorization [auth\_id] was revoked, which dispensation events had already occurred under it?"

```
SELECT d.dispensation_event_id, d.timestamp AS dispensation_time,
       d.product_cpo_reference, d.recipient_reference,
       rev.change_timestamp AS revocation_time,
       EXTRACT(DAY FROM rev.change_timestamp - d.timestamp)
       AS days_before_revocation
FROM dispensation_events d
JOIN ep_deltas rev
  ON d.authorization_reference = rev.authorization_reference
  AND rev.new_state = 'RX_REVOKED'
WHERE d.authorization_reference = :target_auth_id
      AND d.timestamp < rev.change_timestamp
ORDER BY d.timestamp;
```

Expected output: List of dispensation events that occurred before the revocation, with gap duration.

---

### EQP-006: Show all active prescriptions from an issuer whose credentials were restricted or revoked.

Examiner question: "Dr. [reference] had credentials restricted — what prescriptions are still active?"

```
SELECT a.authorization_id, a.prescription_validity_state,
       a.product_bound, a.validity_end,
```

```

        aes.legitimacy_state AS current_issuer_state,
        aes.currency_check_timestamp
FROM authorization_states a
JOIN authorization_evidence_sets aes
    ON a.issuer_aes_reference = aes.evidence_content_address
WHERE aes.issuer_reference_id = :target_issuer_ref
    AND aes.legitimacy_state IN ('ISSU_REVOKED', 'ISSU_RESTRICTED')
    AND a.prescription_validity_state NOT IN ('RX_EXPIRED', 'RX_REVOKED',
        'RX_SUPERSEDED')
ORDER BY a.validity_end;

```

Expected output: Active prescriptions from the affected issuer requiring review or re-authorization.

---

## **E.4 Query Family 3: Dispensation Gate Compliance**

### **EQP-007: Show gate completion records for all dispensation events in a period.**

Examiner question: "Did all dispensations pass their precondition gates?"

```

SELECT d.dispensation_event_id, d.timestamp,
       gc.gate_id, gc.gate_result, gc.failure_reason,
       d.review_posture
FROM dispensation_events d
JOIN gate_completion_records gc
    ON d.dispensation_event_id = gc.dispensation_event_id
WHERE d.timestamp >= :period_start
    AND d.timestamp <= :period_end
    AND gc.gate_result = 'FAIL'
ORDER BY d.timestamp, gc.gate_id;

```

Expected output: All gate failures with associated dispensation events and failure reasons.

---

### **EQP-008: Identify dispensation events where gates were bypassed with override.**

Examiner question: "Were there any gate overrides, and were they properly documented?"

```

SELECT d.dispensation_event_id, d.timestamp,
       d.review_posture,
       gc.gate_id, gc.gate_result,
       ovr.override_authority, ovr.override_justification,
       ovr.override_documentation_ref

```

```

FROM dispensation_events d
JOIN gate_completion_records gc
  ON d.dispensation_event_id = gc.dispensation_event_id
LEFT JOIN gate_overrides ovr
  ON gc.gate_completion_id = ovr.gate_completion_id
WHERE d.timestamp >= :period_start
  AND gc.gate_result = 'FAIL'
  AND d.dispensation_state = 'DISP_RELEASED'
ORDER BY d.timestamp;

```

Expected output: Gate failures that did not prevent dispensation, with override documentation status.

## E.5 Query Family 4: Safety Evidence and Clinical Decision Review

### EQP-009: Show all safety alert overrides in a period with override documentation status.

Examiner question: "How often are safety alerts overridden, and is the documentation adequate?"

```

SELECT ds.decision_id, ds.decision_timestamp,
       ds.decision_type, ds.decision_actor,
       ds.algorithm_version,
       ds.override_justification IS NOT NULL AS has_justification,
       ds.review_posture
FROM decision_states ds
WHERE ds.override_flag = TRUE
  AND ds.decision_timestamp >= :period_start
  AND ds.decision_timestamp <= :period_end
ORDER BY ds.decision_timestamp;

```

Expected output: Override inventory with documentation completeness indicator.

### EQP-010: For a specific clinical decision, retrieve the complete evidence context that existed at decision time.

Examiner question: "Replay decision [decision\_id] — what did the system show and what did the clinician do?"

```

-- Step 1: Retrieve decision state record
SELECT ds.* FROM decision_states ds
WHERE ds.decision_id = :target_decision_id;

```

```
-- Step 2: Retrieve all referenced evidence artifacts
SELECT ea.artifact_id, ea.artifact_type, ea.version,
       ea.content_address, ea.generation_timestamp,
       ea.freshness_status_at_decision_time
FROM evidence_artifacts ea
JOIN decision_evidence_refs der
  ON ea.content_address = der.evidence_content_address
WHERE der.decision_id = :target_decision_id
ORDER BY ea.artifact_type;
```

```
-- Step 3: Retrieve algorithm version metadata
SELECT av.algorithm_id, av.version_id, av.release_date,
       av.deprecation_date, av.status
FROM algorithm_versions av
WHERE av.version_id = :decision_algorithm_version;
```

Expected output: Complete decision context: decision record, all evidence artifacts consulted, and algorithm version status.

---

**EQP-011: Identify dispensation events where safety evidence was superseded before next refill.**

Examiner question: "Are there active prescriptions where the safety data changed since last dispensation?"

```
SELECT d.dispensation_event_id, d.timestamp AS last_dispensation,
       d.product_cpo_reference, d.authorization_reference,
       ses_update.supersession_timestamp,
       ses_update.change_description,
       next_refill.expected_date AS next_refill_date
FROM dispensation_events d
JOIN safety_evidence_supersessions ses_update
  ON d.product_cpo_reference = ses_update.product_cpo_reference
  AND ses_update.supersession_timestamp > d.timestamp
LEFT JOIN refill_schedule next_refill
  ON d.authorization_reference = next_refill.authorization_reference
  AND next_refill.expected_date > ses_update.supersession_timestamp
WHERE next_refill.dispensation_completed = FALSE
```

```
ORDER BY ses_update.supersession_timestamp;
```

Expected output: Dispensation events with safety evidence changes pending before next refill.

---

## E.6 Query Family 5: Reconciliation and Break Management

### EQP-012: Open breaks inventory with aging and SLA compliance.

```
SELECT rb.break_id, rb.break_code, rb.break_name,
       rb.severity, rb.detected_at,
       EXTRACT(DAY FROM CURRENT_TIMESTAMP - rb.detected_at) AS age_days,
       rb.resolution_sla_hours,
       CASE WHEN EXTRACT(HOUR FROM CURRENT_TIMESTAMP - rb.detected_at)
            > rb.resolution_sla_hours THEN 'SLA_BREACHED'
            ELSE 'WITHIN_SLA' END AS sla_status,
       rb.assigned_to, rb.lifecycle_status
FROM reconciliation_breaks rb
WHERE rb.lifecycle_status NOT IN ('RESOLVED', 'CLOSED')
ORDER BY rb.severity, rb.detected_at;
```

---

### EQP-013: Break resolution trend analysis — root causes and resolution times by period.

```
SELECT DATE_TRUNC('month', rb.detected_at) AS period,
       rb.break_code, rb.severity,
       COUNT(*) AS break_count,
       AVG(EXTRACT(HOUR FROM rb.resolved_at - rb.detected_at))
       AS avg_resolution_hours,
       PERCENTILE_CONT(0.95) WITHIN GROUP
       (ORDER BY EXTRACT(HOUR FROM rb.resolved_at - rb.detected_at))
       AS p95_resolution_hours
FROM reconciliation_breaks rb
WHERE rb.lifecycle_status IN ('RESOLVED', 'CLOSED')
      AND rb.detected_at >= :analysis_start
GROUP BY DATE_TRUNC('month', rb.detected_at),
         rb.break_code, rb.severity
ORDER BY period, break_count DESC;
```

---

### EQP-014: Verify reconciliation cadence compliance — were all scheduled reconciliations executed?

```

SELECT rt.reconciliation_type, rt.required_cadence,
       COUNT(re.execution_id) AS executions_in_period,
       rt.expected_executions_in_period,
       CASE WHEN COUNT(re.execution_id) >= rt.expected_executions_in_period
            THEN 'COMPLIANT' ELSE 'NON_COMPLIANT' END AS cadence_status
FROM reconciliation_types rt
LEFT JOIN reconciliation_executions re
  ON rt.reconciliation_type = re.reconciliation_type
  AND re.execution_timestamp >= :period_start
  AND re.execution_timestamp <= :period_end
GROUP BY rt.reconciliation_type, rt.required_cadence,
         rt.expected_executions_in_period;

```

---

## E.7 Query Family 6: Recall Scope and Completeness

### EQP-015: For a specific recall, show scope vs. resolution status.

```

SELECT r.recall_id, r.product_cpo_reference,
       r.batch_lot_reference, r.urgency_classification,
       r.total_units_in_scope,
       SUM(CASE WHEN ra.disposition = 'RETURNED' THEN ra.unit_count ELSE 0 END)
         AS units_returned,
       SUM(CASE WHEN ra.disposition = 'DESTROYED' THEN ra.unit_count ELSE 0 END)
         AS units_destroyed,
       SUM(CASE WHEN ra.disposition = 'DISPENSED_PRE_RECALL'
            THEN ra.unit_count ELSE 0 END) AS units_dispensed_pre_recall,
       r.total_units_in_scope -
         SUM(COALESCE(ra.unit_count, 0)) AS units_unaccounted
FROM recalls r
LEFT JOIN recall_acknowledgments ra
  ON r.recall_id = ra.recall_id
WHERE r.recall_id = :target_recall_id
GROUP BY r.recall_id, r.product_cpo_reference,
         r.batch_lot_reference, r.urgency_classification,
         r.total_units_in_scope;

```

---

### EQP-016: Identify custody holders who have not acknowledged a recall within SLA.

```

SELECT r.recall_id, rn.notified_entity_id,
       rn.notification_timestamp,
       rn.acknowledgment_sla_hours,
       EXTRACT(HOUR FROM CURRENT_TIMESTAMP - rn.notification_timestamp)
         AS hours_since_notification,
       CASE WHEN ra.acknowledgment_timestamp IS NULL THEN 'NOT_ACKNOWLEDGED'
            ELSE 'ACKNOWLEDGED' END AS ack_status
FROM recall_notifications rn
JOIN recalls r ON rn.recall_id = r.recall_id
LEFT JOIN recall_acknowledgments ra
  ON rn.recall_id = ra.recall_id
  AND rn.notified_entity_id = ra.acknowledging_entity_id
WHERE r.recall_id = :target_recall_id
      AND ra.acknowledgment_timestamp IS NULL
      AND EXTRACT(HOUR FROM CURRENT_TIMESTAMP - rn.notification_timestamp)
        > rn.acknowledgment_sla_hours
ORDER BY hours_since_notification DESC;

```

---

## E.8 Query Family 7: Tiered Access Compliance

### EQP-017: Show all Tier 2 access events with approval and PARP status.

```

SELECT ta.access_event_id, ta.timestamp, ta.actor_id,
       ta.purpose_code, ta.trigger_condition,
       ta.approval_officer_1, ta.approval_officer_2,
       ta.ttl_expiry,
       parp.review_timestamp AS parp_completed,
       CASE WHEN parp.review_timestamp IS NULL THEN 'PARP_MISSING'
            WHEN parp.review_timestamp >
              ta.ttl_expiry + INTERVAL '5 days' THEN 'PARP_OVERDUE'
            ELSE 'PARP_COMPLETE' END AS parp_status
FROM tier2_access_events ta
LEFT JOIN post_access_review_packs parp
  ON ta.access_event_id = parp.access_event_reference
WHERE ta.timestamp >= :period_start
ORDER BY ta.timestamp;

```

---

**EQP-018: Access volume and purpose distribution across all tiers.**

```
SELECT ta.tier_level, ta.purpose_code,
       COUNT(*) AS access_count,
       COUNT(DISTINCT ta.actor_id) AS unique_reviewers,
       AVG(EXTRACT(HOUR FROM ta.ttl_expiry - ta.timestamp))
       AS avg_ttl_hours
FROM all_access_events ta
WHERE ta.timestamp >= :period_start
GROUP BY ta.tier_level, ta.purpose_code
ORDER BY ta.tier_level, access_count DESC;
```

---

**E.9 Query Family 8: Governance and Accountability****EQP-019: Show all liability trigger events in a period with response status.**

```
SELECT lt.trigger_id, lt.trigger_code, lt.condition_description,
       lt.severity, lt.detected_at,
       lt.immediate_action_taken, lt.escalation_record_ref,
       lt.resolution_status,
       pb.preservation_bundle_id
FROM liability_trigger_events lt
LEFT JOIN preservation_bundles pb
  ON lt.trigger_id = pb.trigger_reference
WHERE lt.detected_at >= :period_start
ORDER BY lt.severity, lt.detected_at;
```

---

**EQP-020: Verify no single-party overrides of governance controls.**

```
SELECT ar.event_id, ar.event_type, ar.timestamp,
       ar.actor_id, ar.authority_reference,
       ar.approval_chain,
       CASE WHEN JSON_ARRAY_LENGTH(ar.approval_chain) < 2
            THEN 'SINGLE_PARTY_VIOLATION'
            ELSE 'MULTI_PARTY_COMPLIANT' END AS approval_status
FROM accountability_records ar
WHERE ar.event_type IN ('CORRECTION', 'OVERRIDE', 'HOLD_RELEASE',
                       'RECALL_CLOSURE', 'TIER2_GRANT', 'GOVERNANCE_ACTION')
AND ar.timestamp >= :period_start
```

```
AND JSON_ARRAY_LENGTH(ar.approval_chain) < 2
ORDER BY ar.timestamp;
```

Expected output: Any governance actions executed with fewer than 2 approvers — should be empty if no-master-key posture maintained.

---

## E.10 Query Family 9: Offboarding Verification

### EQP-021: Verify offboarding completeness — final snapshot, reconciliation, and open breaks.

```
SELECT ob.offboarding_id, ob.offboarding_trigger,
       ob.final_snapshot_hash, ob.final_snapshot_verified,
       ob.final_reconciliation_executed,
       ob.open_breaks_count, ob.open_breaks_governance_approved,
       ob.legacy_transition_manifest_hash,
       ob.post_transfer_verification_result
FROM offboarding_records ob
WHERE ob.offboarding_id = :target_offboarding_id;
```

---

### EQP-022: Compare evidence counts between framework and legacy system post-transfer.

```
SELECT ltm.evidence_type,
       ltm.framework_artifact_count,
       ltm.legacy_record_count,
       ltm.framework_artifact_count - ltm.legacy_record_count AS delta,
       ltm.data_loss_items, ltm.data_loss_mitigation
FROM legacy_transition_manifests ltm
WHERE ltm.offboarding_id = :target_offboarding_id
ORDER BY ABS(ltm.framework_artifact_count - ltm.legacy_record_count) DESC;
```

---

## E.11 Query Family 10: Claim and Reimbursement (Optional)

### EQP-023: Show claims with evidence gate failures and their resolution.

```
SELECT c.claim_id, c.submission_timestamp, c.claim_status,
       cg.gate_id, cg.gate_result, cg.failure_reason,
       cr.resolution_action, cr.resolution_timestamp
FROM claims c
JOIN claim_evidence_gates cg ON c.claim_id = cg.claim_id
LEFT JOIN claim_gate_resolutions cr ON cg.gate_id = cr.gate_id
AND c.claim_id = cr.claim_id
```

```

WHERE cg.gate_result = 'FAIL'
      AND c.submission_timestamp >= :period_start
ORDER BY c.submission_timestamp;

```

---

**EQP-024: Post-payment adjustment and reversal inventory with upstream triggers.**

```

SELECT adj.claim_id, adj.adjustment_type,
       adj.adjustment_amount, adj.adjustment_reason,
       adj.upstream_change_type, adj.upstream_change_reference,
       adj.adjustment_timestamp, adj.recovery_status
FROM claim_adjustments adj
WHERE adj.adjustment_timestamp >= :period_start
ORDER BY adj.adjustment_timestamp;

```

---

**E.12 Query Summary Table**

| Query ID | Examiner Question (Summary)                           | Family         | Tier Level      |
|----------|---|----------------|-----------------|
| EQP-001  | Current authenticity state of a product               | Authenticity   | Tier 1          |
| EQP-002  | Open provenance breaks inventory                      | Authenticity   | Tier 0 / Tier 1 |
| EQP-003  | Complete provenance chain replay                      | Authenticity   | Tier 1          |
| EQP-004  | Authorization lifecycle timeline                      | Authorization  | Tier 1          |
| EQP-005  | Dispensation under subsequently revoked authorization | Authorization  | Tier 1          |
| EQP-006  | Active prescriptions from restricted issuer           | Authorization  | Tier 1          |
| EQP-007  | Gate failures for dispensation events                 | Dispensation   | Tier 1          |
| EQP-008  | Gate overrides with documentation status              | Dispensation   | Tier 1          |
| EQP-009  | Safety alert override inventory                       | Safety         | Tier 1          |
| EQP-010  | Decision context replay                               | Safety         | Tier 1          |
| EQP-011  | Superseded safety evidence before refill              | Safety         | Tier 1          |
| EQP-012  | Open breaks with aging and SLA                        | Reconciliation | Tier 0 / Tier 1 |
| EQP-013  | Break trend analysis                                  | Reconciliation | Tier 0          |
| EQP-014  | Reconciliation cadence compliance                     | Reconciliation | Tier 0          |
| EQP-015  | Recall scope vs. resolution                           | Recall         | Tier 1          |
| EQP-016  | Overdue recall acknowledgments                        | Recall         | Tier 1          |
| EQP-017  | Tier 2 access with PARP status                        | Access         | Tier 0 / Tier 1 |
| EQP-018  | Access volume by tier and purpose                     | Access         | Tier 0          |
| EQP-019  | Liability trigger events with response                | Governance     | Tier 1          |
| EQP-020  | Single-party override detection                       | Governance     | Tier 1          |
| EQP-021  | Offboarding completeness verification                 | Offboarding    | Tier 1          |
| EQP-022  | Post-transfer evidence count comparison               | Offboarding    | Tier 1          |
| EQP-023  | Claim gate failures and resolution                    | Claims         | Tier 1          |
| EQP-024  | Post-payment adjustments inventory                    | Claims         | Tier 1          |

# Appendix F — Preservation Bundle and Hold-Set Templates

## F.1 Preservation Bundle Manifest Template

A Preservation Bundle (PB) is a sealed, content-addressed evidence collection assembled for incidents, disputes, recalls, investigations, or legal holds. This template defines the standard structure.

### PB Manifest Template:

preservation\_bundle:

bundle\_id: PB-[DOMAIN]-[YYYY]-[SEQUENCE]

# Example: PB-PROV-2026-0045, PB-RECALL-2026-0012

trigger:

trigger\_type: RECONCILIATION\_BREAK | RECALL | SAFETY\_INCIDENT |  
TIER2\_ACCESS | DISPUTE | LEGAL\_HOLD | INTEGRITY\_FAILURE |  
LIABILITY\_TRIGGER | OFFBOARDING

trigger\_reference: [content\_address or event\_id of triggering event]

trigger\_timestamp: [UTC]

trigger\_severity: SEV-1 | SEV-2 | SEV-3

trigger\_description: [plain-language description]

scope:

affected\_products: [list of CPO references]

affected\_authorizations: [list of authorization IDs]

affected\_custody\_chains: [list of custody chain references]

affected\_dispensation\_events: [list of dispensation event IDs]

affected\_claims: [list of claim IDs, if Section 12 in scope]

time\_window: {start: [UTC], end: [UTC]}

contents:

detection\_artifacts:

- artifact\_id: [content\_address]

artifact\_type: [break\_detection | recall\_notification |  
incident\_report | access\_request | ...]

description: [brief description]

containment\_artifacts:

- artifact\_id: [content\_address]

artifact\_type: [hold\_entry | quarantine\_entry |  
segregation\_verification | ...]

```
    description: [brief description]
investigation_artifacts:
  - artifact_id: [content_address]
    artifact_type: [investigation_log | root_cause_analysis |
                  evidence_snapshot | ...]
    description: [brief description]
resolution_artifacts:
  - artifact_id: [content_address]
    artifact_type: [correction_ep_delta | determination_record |
                  release_authorization | ...]
    description: [brief description]
post_review_artifacts:
  - artifact_id: [content_address]
    artifact_type: [post_access_review | lessons_learned |
                  recert_assessment | ...]
    description: [brief description]
upstream_evidence_sets:
  paes_references: [list of content addresses]
  aes_references: [list of content addresses]
  ces_references: [list of content addresses]
  ses_references: [list of content addresses]
  dep_h_references: [list of content addresses]
  clm_ep_references: [list of content addresses, if applicable]
integrity:
  manifest_hash: [SHA-256 of complete manifest]
  individual_artifact_hashes:
    - artifact_id: [content_address]
      verified: true | false
  chain_verification: PASS | FAIL
lifecycle:
  created_at: [UTC]
  created_by: [role-based identifier]
  sealed_at: [UTC] # null if still open
  sealed_by: [role-based identifier]
  legal_hold_status: true | false
```

legal\_hold\_reference: [hold instruction reference, if applicable]  
 retention:  
   retention\_class: PRESERVATION  
   retention\_period: INDEFINITE | [specific period]  
   destruction\_prohibited\_until: [date or INDEFINITE]  
 chain\_of\_custody:  
   - action: creation  
     timestamp: [UTC]  
     actor: [identifier]  
     justification: [trigger reference]  
   - action: artifact\_added  
     timestamp: [UTC]  
     actor: [identifier]  
     artifact\_count: [integer]  
   - action: sealed  
     timestamp: [UTC]  
     actor: [identifier]  
     attestation: [officer attestation reference]  
 bundle\_content\_address: [self-referential hash of complete manifest]

---

## F.2 Preservation Bundle Templates by Trigger Type

### F.2.1 Reconciliation Break Preservation Bundle

| Manifest Section        | Required Contents for Break PB  |
|-------------------------|---|
| detection_artifacts     | Break detection ILS record; reconciliation execution report that identified the break; severity assessment record                   |
| containment_artifacts   | Hold-only containment record (CUS_HOLD_ENTRY or equivalent); containment verification evidence                                      |
| investigation_artifacts | Root cause analysis report; evidence snapshots (before/after states); transaction logs for affected period; differential analysis   |
| resolution_artifacts    | Correction EP Delta (if correction applied); resolution approval record; post-correction reconciliation report confirming alignment |
| post_review_artifacts   | Break closure record; lessons learned document (if material break); recert trigger assessment                                       |
| upstream_evidence_sets  | PAES, AES, CES, SES for affected product and authorization scope  |

### F.2.2 Recall Preservation Bundle

| Manifest Section    | Required Contents for Recall PB  |
|---------------------|--|
| detection_artifacts | Recall notification record; scope determination with aggregation hierarchy traversal; urgency classification |

| <b>Manifest Section</b> | <b>Required Contents for Recall PB</b>   |
|-------------------------|--|
| containment_artifacts   | Quarantine entry records for all affected units; inventory assessment records from custody holders   |
| investigation_artifacts | Recall acknowledgment tracking records; recall scope correction EP Deltas (if scope changed); patient notification records (pseudonymized) |
| resolution_artifacts    | Return/destruction evidence for all resolved units; recall closure report with scope vs. resolution reconciliation                         |
| post_review_artifacts   | Post-recall assessment; lessons learned; recert trigger assessment   |
| upstream_evidence_sets  | PAES for recalled product; CES for all custody holders of recalled batch/lot   |

### F.2.3 Safety Incident Preservation Bundle

| <b>Manifest Section</b> | <b>Required Contents for Safety Incident PB</b>  |
|-------------------------|--|
| detection_artifacts     | Incident detection record; adverse event report (if applicable); safety alert records                              |
| containment_artifacts   | Product hold or quarantine records; dispensation hold records; patient notification records (pseudonymized)        |
| investigation_artifacts | Product PAES; authorization AES; custody CES; safety SES; context-bound decision state records; dispensation DEP-H |
| resolution_artifacts    | Investigation determination; corrective action records; product disposition (cleared, quarantined, recalled)       |
| post_review_artifacts   | Safety review report; institutional corrective action plan; regulatory notification records (if applicable)        |
| upstream_evidence_sets  | Complete evidence chain from product manufacture through dispensation  |

### F.2.4 Tier 2 Access Preservation Bundle

| <b>Manifest Section</b> | <b>Required Contents for Tier 2 PB</b>   |
|-------------------------|--|
| detection_artifacts     | Tier 2 access request with objective trigger documentation; dual-control approval records                                |
| containment_artifacts   | Access scope definition; TTL assignment; purpose code documentation  |
| investigation_artifacts | Evidence accessed inventory (list of artifact content addresses accessed); access event logs; findings document          |
| resolution_artifacts    | Investigation determination; referral or closure record  |
| post_review_artifacts   | Post-Access Review Pack (PARP); scope compliance verification; participant notification record or deferral justification |
| upstream_evidence_sets  | All evidence sets accessed during Tier 2 investigation   |

## F.3 Hold-Set Template

A hold-set is a structured record documenting the scope, authority, and conditions of a hold-only containment action. Hold-sets are maintained as active records during the hold period and become part of the Preservation Bundle at hold release or investigation closure.

### Hold-Set Record Template:

hold\_set :

hold\_id: HOLD-[DOMAIN]-[YYYY]-[SEQUENCE]

```

# Example: HOLD-CUST-2026-0088
hold_type: EVIDENCE_HOLD | REGULATORY_HOLD | RECALL_HOLD |
          DISPUTE_HOLD | SAFETY_HOLD | INVESTIGATION_HOLD
authority:
  hold_authority_role: [role identifier per RACI]
  hold_authority_entity: [pseudonymized entity identifier]
  approval_chain:
    - approver: [identifier]
      approval_timestamp: [UTC]
      approval_method: [digital signature | documented approval]
    - approver: [identifier] # second approver if dual-control required
      approval_timestamp: [UTC]
scope:
  affected_products:
    - cpo_reference: [content_address]
      unit_count: [integer]
      aggregation_level: UNIT | PACKAGE | CASE | BATCH
  affected_authorizations: [list of authorization IDs]
  affected_dispensation_events: [list of event IDs – pending only]
  affected_claims: [list of claim IDs, if applicable]
conditions:
  hold_reason_code: [BRK code | RECALL reference | SAFETY reference |
                   REGULATORY reference | DISPUTE reference]
  hold_reason_description: [plain-language description]
  hold_start_timestamp: [UTC]
  expected_duration: [hours or "UNTIL_RESOLVED"]
  maximum_duration_before_escalation: [hours]
  escalation_target: [governance body or regulatory authority]
restrictions:
  dispensation_blocked: true
  transfer_blocked: true | false # transfer may be permitted for
                                # quarantine movement
  claim_progression_blocked: true | false
  custody_state_changes_blocked: true # except quarantine and
                                     # investigation events

```

```

monitoring:
  monitoring_cadence: [daily | weekly | per governance determination]
  monitoring_responsible: [role identifier]
  last_review_timestamp: [UTC]
  next_review_due: [UTC]
resolution: # populated at hold release
  resolution_type: RELEASED | ESCALATED | TRANSFERRED |
                  CONVERTED_TO_RECALL
  resolution_timestamp: [UTC]
  resolution_evidence: [content_address of resolution documentation]
  resolution_authority:
    - approver: [identifier]
      approval_timestamp: [UTC]
  post_release_verification: [content_address of verification record]
evidence_linkage:
  triggering_break: [break_id, if applicable]
  triggering_recall: [recall_id, if applicable]
  preservation_bundle: [PB reference, if PB triggered]
hold_set_content_address: [self-referential hash]

```

---

## F.4 Hold-Set Lifecycle Events

Each hold-set generates ILS records at each lifecycle transition:

| Lifecycle Event          | ILS Event Code   | Required Fields  | SLA   |
|--------------------------|------------------|--|---|
| Hold placed              | CUS_HOLD_ENTRY   | hold_id, authority, scope, reason, restrictions                                    | SEV-1: immediate;<br>SEV-2: <1 hour;<br>SEV-3: <4 hours |
| Hold reviewed (periodic) | HOLD_REVIEWED    | hold_id, review_timestamp, reviewer, continued_justification                       | Per monitoring cadence                                  |
| Hold escalated           | HOLD_ESCALATED   | hold_id, escalation_reason, escalation_target, escalation_timestamp                | When maximum duration exceeded without resolution       |
| Hold released            | CUS_HOLD_RELEASE | hold_id, resolution_type, resolution_evidence, approval_chain, verification_record | Within 4 hours of resolution determination              |
| Hold converted           | HOLD_CONVERTED   | hold_id, conversion_target (recall_id), conversion_authority                       | Per governance determination                            |

| Lifecycle Event   | ILS Event Code | Required Fields | SLA |
|-------------------|----------------|-----------------|-----|
| (e.g., to recall) |                |                 |     |

## F.5 Legal Hold Activation Template

Legal holds require specific additional controls beyond operational holds.

### Legal Hold Activation Record:

legal\_hold:

hold\_reference: LH-[YYYY]-[SEQUENCE]

activation:

activation\_authority: [legal counsel or regulatory authority identifier]

activation\_document: [content\_address of hold instruction]

activation\_timestamp: [UTC]

scope\_description: [plain-language description of evidence scope]

scope:

evidence\_types\_in\_scope: [list: PAES, AES, CES, SES, DEP-H, CLM-EP, ILS, PB, accountability\_records]

product\_scope: [CPO references or "ALL\_PRODUCTS\_IN\_RANGE"]

time\_scope: {start: [UTC], end: [UTC] or "ONGOING"}

entity\_scope: [affected institutional participants]

retention\_override:

standard\_retention\_suspended: true

destruction\_prohibited: true

override\_effective\_until: [date or "UNTIL\_RELEASED"]

monitoring:

hold\_custodian: [designated responsible party]

compliance\_verification\_cadence: MONTHLY

last\_verification: [UTC]

release: # populated at hold release

release\_authority: [same authority level as activation]

release\_document: [content\_address of release instruction]

release\_timestamp: [UTC]

post\_release\_retention: [standard retention resumes | specific period]

legal\_hold\_content\_address: [self-referential hash]

## Appendix G — RACI Matrices + Accountability Inserts

### G.1 Purpose and Conventions

RACI matrices define accountability for critical operational activities across participant roles. Conventions follow Baseline C's RACI structure:

- **R (Responsible):** Performs the work; produces the evidence artifact.
- **A (Accountable):** Ultimately answerable; approves the output; one A per activity.
- **C (Consulted):** Provides input or expertise before the activity is performed.
- **I (Informed):** Notified of the outcome after the activity is completed.

#### Role Abbreviations Used:

| Abbreviation | Role  |
|--------------|---|
| MFR          | Manufacturer or marketing authorization holder                        |
| DIST         | Distributor / logistics provider                                      |
| PHRM         | Pharmacy / dispensing entity  |
| HOSP         | Hospital / institutional healthcare facility                          |
| PRSC         | Prescriber / authorizing clinician                                    |
| CRED         | Credentialing body / authority  |
| GOV          | Framework governance body (Steering Committee / Change Control Board) |
| SURV         | Surveillance / monitoring function                                    |
| EXAM         | Examiner support / regulatory liaison                                 |
| BENE         | Benefit administrator / payer (optional, Section 12 scope)            |

### G.2 RACI Matrix — Product Authenticity and Provenance

| Activity  | MFR           | DIST          | PHRM/<br>HOSP   | GOV | SURV | EXAM |
|---|---------------|---------------|-----------------|-----|------|------|
| Generate Canonical Product Object (CPO)             | R/A           | I             | I               | I   | I    | I    |
| Maintain provenance manifest                        | R             | R             | R (own segment) | I   | I    | C    |
| Verify product identity at receipt (CUS_RECEIPT)    | C             | R             | R               | I   | I    | I    |
| Generate and store PAES                             | R (origin)    | R (additions) | R (additions)   | I   | C    | I    |
| Detect provenance break (BRK-PROV)                  | C             | R             | R               | I   | R/A  | C    |
| Contain provenance break (hold-only)                | C             | R/A           | R/A             | C   | I    | I    |
| Investigate provenance break                        | R (if origin) | R             | R               | C   | R/A  | C    |
| Resolve provenance break (correction/determination) | R             | R             | R               | A   | C    | I    |

| Activity                               | MFR | DIST | PHRM/<br>HOSP | GOV | SURV | EXAM |
|--|-----|------|---------------|-----|------|------|
| Initiate product recall                | R/A | I    | I             | I   | I    | I    |
| Track recall scope and acknowledgments | R   | R    | R             | C   | R/A  | C    |
| Close recall with scope reconciliation | R/A | R    | R             | A   | C    | I    |

### G.3 RACI Matrix — Authorization, Prescription, and Issuer Legitimacy

| Activity  | PRSC | PHRM/<br>HOSP | CRED | GOV | SURV | EXAM |
|---|------|---------------|------|-----|------|------|
| Issue prescription / authorization                      | R/A  | I             | I    | I   | I    | I    |
| Verify issuer legitimacy at dispensation                | I    | R/A           | C    | I   | I    | I    |
| Generate and store AES                                  | I    | R             | C    | I   | I    | I    |
| Perform revocation check at dispensation                | I    | R/A           | C    | I   | I    | I    |
| Perform scope-match verification                        | I    | R/A           | I    | I   | I    | I    |
| Detect authorization break (BRK-AUTH)                   | I    | R             | C    | I   | R/A  | C    |
| Contain authorization break (hold pending dispensation) | I    | R/A           | I    | C   | I    | I    |
| Revoke authorization (prescriber-initiated)             | R/A  | I             | I    | I   | I    | I    |
| Revoke authorization (governance-initiated)             | C    | I             | C    | R/A | I    | I    |
| Manage supersession chain                               | R    | R             | I    | I   | I    | I    |
| Verify delegation authority                             | I    | R/A           | C    | I   | I    | I    |
| Emergency authorization review (post-hoc)               | R    | R             | C    | A   | C    | I    |

### G.4 RACI Matrix — Chain-of-Custody and Dispensation

| Activity                                | MFR        | DIST | PHRM/HOSP | GOV | SURV | EXAM |
|---|------------|------|-----------|-----|------|------|
| Log custody events (CUS_ taxonomy)      | R          | R    | R         | I   | I    | I    |
| Maintain storage condition monitoring   | R          | R    | R         | I   | I    | I    |
| Assess storage excursions               | R          | R    | R         | I   | C    | I    |
| Generate and store CES                  | R (origin) | R    | R         | I   | C    | I    |
| Execute dispensation precondition gates | I          | I    | R/A       | I   | I    | I    |
| Document dispensation (DEP-H)           | I          | I    | R/A       | I   | I    | I    |
| Detect custody break (BRK-CUST)         | I          | R    | R         | I   | R/A  | C    |
| Contain custody break (hold-only)       | I          | R/A  | R/A       | C   | I    | I    |
| Investigate custody break               | C          | R    | R         | C   | R/A  | C    |
| Execute product quarantine              | I          | R    | R         | I   | I    | I    |
| Process product returns                 | I          | R    | R         | I   | I    | I    |
| Document product destruction            | I          | R/A  | R/A       | I   | I    | I    |

## G.5 RACI Matrix — Proof-of-Safety and Clinical Decision Evidence

| Activity   | PRSC      | PHRM/<br>HOSP   | MFR                 | GOV | SURV | EXAM |
|--|-----------|-----------------|---------------------|-----|------|------|
| Generate safety evidence (PS-01 through PS-05)         | I         | R               | R (PS-01, PS-02)    | I   | I    | I    |
| Generate decision-level evidence (DS-01 through DS-05) | R (DS-05) | R (DS-01–DS-04) | I                   | I   | I    | I    |
| Generate and store SES                                 | I         | R/A             | C                   | I   | I    | I    |
| Record context-bound decision states                   | R         | R               | I                   | I   | I    | I    |
| Document safety alert overrides (DS-05)                | R/A       | C               | I                   | I   | I    | I    |
| Detect safety evidence break (BRK-SAFE)                | I         | R               | C                   | I   | R/A  | C    |
| Contain safety break (dispensation hold)               | I         | R/A             | I                   | C   | I    | I    |
| Refresh superseded safety evidence                     | I         | R               | R (provide updates) | I   | I    | I    |
| Execute manual confirmation pathway                    | I         | R/A             | I                   | I   | I    | I    |
| Post-decision review (Exceptional posture)             | C         | R               | I                   | A   | C    | I    |

## G.6 RACI Matrix — Reconciliation and Evidence Integrity

| Activity                                   | MFR           | DIST | PHRM/<br>HOSP | GOV | SURV | EXAM |
|--|---------------|------|---------------|-----|------|------|
| Execute scheduled reconciliation           | I             | R    | R             | I   | R/A  | I    |
| Detect reconciliation breaks               | I             | C    | C             | I   | R/A  | C    |
| Classify break severity                    | I             | C    | C             | C   | R/A  | I    |
| Apply containment per severity             | I             | R    | R             | C   | A    | I    |
| Investigate breaks (root cause)            | R (if origin) | R    | R             | C   | R/A  | C    |
| Approve break resolution                   | I             | C    | C             | A   | C    | I    |
| Execute post-resolution reconciliation     | I             | C    | C             | I   | R/A  | I    |
| Close break record                         | I             | I    | I             | I   | R/A  | I    |
| Generate Preservation Bundle               | I             | R    | R             | I   | R/A  | I    |
| Maintain open breaks register              | I             | I    | I             | I   | R/A  | C    |
| Verify content-addressed storage integrity | I             | I    | I             | I   | R/A  | C    |
| Respond to evidence retrieval requests     | R             | R    | R             | I   | C    | R/A  |

## G.7 RACI Matrix — Tiered Access and Governance

| Activity                                      | GOV | SURV          | EXAM        | PHRM/HOSP           | CRED |
|---|-----|---------------|-------------|---------------------|------|
| Approve Tier 1 access requests                | R/A | C             | R (request) | I                   | I    |
| Approve Tier 2 access requests (dual-control) | R/A | C             | R (request) | I                   | I    |
| Execute post-access review (PARP)             | R   | C             | I           | I                   | I    |
| Monitor Tier 2 access frequency               | I   | R/A           | I           | I                   | I    |
| Maintain purpose code registry                | R/A | C             | C           | I                   | I    |
| Execute recertification cycles                | R/A | C             | I           | R (self-assessment) | C    |
| Process material change triggers              | R/A | R (detection) | I           | R (notification)    | C    |
| Maintain liability trigger catalog            | R/A | C             | C           | I                   | I    |
| Operate Change Control Board                  | R/A | C             | I           | C                   | I    |
| Document governance decisions                 | R/A | I             | I           | I                   | I    |
| Enforce no-master-key posture                 | R/A | C             | C           | C                   | I    |

## G.8 RACI Matrix — Claim and Reimbursement (Optional)

Included only where Section 12 is in scope.

| Activity                                   | PHRM/HOSP | BENE | GOV | SURV | EXAM |
|--|-----------|------|-----|------|------|
| Submit claim (CLM_SUBMITTED)               | R/A       | I    | I   | I    | I    |
| Evaluate claim evidence gates (CG-1–CG-6)  | I         | R/A  | I   | I    | I    |
| Adjudicate claim                           | I         | R/A  | I   | I    | I    |
| Execute payout                             | I         | R/A  | I   | I    | I    |
| Detect claim break (BRK-CLAIM)             | C         | R    | I   | R/A  | C    |
| Contain claim break (hold)                 | C         | R/A  | C   | I    | I    |
| Execute post-payment adjustment / reversal | C         | R/A  | C   | I    | I    |
| Maintain open breaks register (claims)     | I         | R    | I   | R/A  | C    |
| Respond to claim-related examiner queries  | R         | R    | I   | C    | R/A  |

## G.9 Accountability Inserts

Accountability inserts are standardized documentation blocks appended to governance actions, corrections, overrides, and escalation decisions. Each insert records the essential accountability information in a consistent format.

### Accountability Insert Template:

| Field       | Content  |
|-------------|--|
| Insert ID   | AI-[YYYYY]-[SEQUENCE]  |
| Action type | CORRECTION / OVERRIDE / HOLD_RELEASE / RECALL_CLOSURE / TIER2_GRANT / DELEGATION / MATERIAL_CHANGE / |

| <b>Field</b>                  | <b>Content</b>  |
|-------------------------------|---|
|                               | GOVERNANCE_DECISION   |
| Action timestamp              | [UTC]   |
| Acting entity                 | [role-based or pseudonymized identifier]  |
| Authority basis               | [governance approval reference / delegation instrument / regulatory authority / institutional policy]   |
| Justification                 | [plain-language justification with evidence references]   |
| Approval chain                | [list of approvers with timestamps — minimum 2 for material actions]                                    |
| Affected scope                | [products, authorizations, dispensation events, claims affected]  |
| Downstream impact assessment  | [assessment of actions that relied on pre-change state; required re-verification or adjustment actions] |
| Evidence references           | [content addresses of supporting evidence artifacts]  |
| Preservation bundle reference | [PB reference if action triggered preservation]   |
| Insert content address        | [self-referential hash for tamper detection]  |

**Insert Application Rules:**

- Every accountability record (Section 11.9) must include an accountability insert.
- Inserts are stored as ILS records with content-addressed integrity.
- Inserts are retrievable by the examiner query pack (EQP-019, EQP-020) for governance compliance review.
- Missing inserts for material governance actions constitute a governance violation (GOVN-009 check failure).
- Inserts are retained for the longest of: the affected evidence retention period, the institutional governance retention requirement, and any applicable legal hold.

# Appendix H — Content-Addressed Manifest, Diff, and Retrieval Templates

## H.1 Purpose

This appendix provides paste-ready templates for the three core content-addressed artifact types used throughout the framework: manifests (evidence inventories), diffs (state change records), and retrieval requests (examiner-initiated evidence production). All templates follow Baseline C's content-addressed storage conventions and are implementation-agnostic.

---

## H.2 Content-Addressed Manifest Template (Generic)

Every evidence collection in the framework — PAES, AES, CES, SES, DEP-H, CLM-EP, Preservation Bundles, offboarding proof bundles — is indexed by a manifest. This generic template defines the common structure; domain-specific manifests (Appendix B) extend it with additional fields.

```
manifest:
  # --- IDENTITY ---
  manifest_id: [content_address – computed after all fields populated]
  manifest_type: PAES | AES | CES | SES | DEP-H | CLM-EP | PB |
                OFFBOARDING | RECONCILIATION | PROVENANCE
  manifest_version: [integer – incremented on each update]
  supersedes: [content_address of prior version, null if genesis]

  # --- SUBJECT ---
  subject:
    subject_type: PRODUCT | AUTHORIZATION | CUSTODY_CHAIN |
                DISPENSATION | DECISION | CLAIM | SCOPE_BUNDLE
    subject_reference: [content_address or identifier of subject]
    subject_description: [human-readable; e.g., "Product X, LOT-2026-0955"]

  # --- TIME RANGE ---
  period:
    period_start: [UTC]
    period_end: [UTC]
    snapshot_timestamp: [UTC – when this manifest was generated]

  # --- ARTIFACT INVENTORY ---
```

```

artifacts:
  - artifact_id: [content_address]
    artifact_type: [ILS | EP_DELTA | CONDITION_LOG | CREDENTIAL_REF |
                   GATE_RECORD | DECISION_STATE | RECON_REPORT |
                   EXCURSION_RECORD | HOLD_SET | RECALL_RECORD | ...]
    artifact_timestamp: [UTC – when the artifact was created]
    artifact_description: [brief human-readable description]
    integrity_verified: true | false
    integrity_verification_timestamp: [UTC]
  - ... [repeated for each artifact in the manifest]

# --- COMPLETENESS ---
completeness:
  required_artifact_types: [list of artifact types required for this
                           manifest type per framework rules]
  present_artifact_types: [list of types actually present]
  missing_artifact_types: [list of types missing, with reason codes]
  completeness_percentage: [0-100]
  gaps_documented: true | false

# --- CROSS-REFERENCES ---
linked_manifests:
  - manifest_type: [type of linked manifest]
    manifest_id: [content_address]
    relationship: DEPENDS_ON | REFERENCED_BY | SUPERSEDES | PART_OF
  - ...

# --- INTEGRITY ---
integrity:
  hash_algorithm: SHA-256
  artifact_hashes_verified: [count verified / count total]
  chain_verification_result: PASS | FAIL | NOT_APPLICABLE
  manifest_content_address: [self-referential hash – computed last]

# --- LIFECYCLE ---

```

```

lifecycle:
  created_at: [UTC]
  created_by: [role-based identifier]
  last_updated_at: [UTC]
  last_updated_by: [role-based identifier]
  sealed: true | false
  sealed_at: [UTC, if sealed]

# --- RETENTION ---
retention:
  retention_class: [per Section 9.7 / Baseline C retention taxonomy]
  retention_period: [years or INDEFINITE]
  legal_hold_status: false | true
  destruction_eligible_date: [date, if not under legal hold]

```

---

### H.3 EP Delta (State Change Diff) Template

EP Deltas document state transitions for any evidence artifact, authorization, product state, or reconciliation record. They are the primary mechanism for non-destructive correction and supersession tracking.

```

ep_delta:
  # --- IDENTITY ---
  delta_id: [content_address – computed after all fields populated]
  delta_sequence: [integer – position in the delta chain for this subject]

  # --- SUBJECT ---
  subject_reference: [content_address of the artifact or state being changed]
  subject_type: PRODUCT_STATE | AUTHORIZATION_STATE | CUSTODY_STATE |
                SAFETY_STATE | HOLD_STATE | CLAIM_STATE | EVIDENCE_ARTIFACT |
                CPO | PROVENANCE_MANIFEST | SUPERSESSION_CHAIN

  # --- CHANGE DESCRIPTION ---
  change:
    change_type: CORRECTION | SUPERSESSION | REVOCATION | SUSPENSION |
                 REINSTATEMENT | SCOPE_MODIFICATION | RENEWAL | EXPIRY |
                 RECLASSIFICATION | RECALL_SCOPE_CHANGE | HOLD_ENTRY |

```

```

                HOLD_RELEASE | FRESHNESS_REFRESH
previous_state: [state value or content_address of prior version]
new_state: [state value or content_address of new version]
change_timestamp: [UTC]
change_description: [human-readable explanation]

# --- AUTHORITY ---
authority:
    change_authority: [role-based identifier of entity causing the change]
    authority_basis: [governance_approval | credential_event | regulatory_action
|
                    automated_detection | institutional_policy |
prescriber_action]
    approval_chain:
        - approver_id: [identifier]
          approval_timestamp: [UTC]
        - approver_id: [identifier] # second approver if required
          approval_timestamp: [UTC]

# --- EVIDENCE ---
change_evidence:
    supporting_evidence: [content_address of evidence justifying the change]
    investigation_reference: [break_id or incident_id, if applicable]

# --- DOWNSTREAM IMPACT ---
downstream_impact:
    affected_dispensation_events: [count or list of event IDs]
    affected_claims: [count or list of claim IDs]
    affected_custody_chains: [count or list of chain references]
    hold_actions_triggered: [count or list of hold IDs]
    notification_records: [content_addresses of notifications sent]
    propagation_status: COMPLETE | IN_PROGRESS | NOT_REQUIRED

# --- CHAIN LINKAGE ---
chain:
    previous_delta_hash: [content_address of preceding EP Delta for this

```

```
subject, null if first delta]
delta_content_address: [self-referential hash – computed last]
```

**Diff Chaining.** EP Deltas for the same subject form a content-addressed chain. Each delta contains the hash of the preceding delta, enabling a reviewer to traverse the complete change history from the current state back to the original. Chain integrity is verifiable through hash validation at each link.

**Diff Optimization.** Only changed fields are recorded in the change section. Unchanged fields are omitted from the diff to reduce storage overhead. The `previous_state` and `new_state` fields contain complete state values (not partial diffs), enabling independent interpretation of each delta without requiring access to the full artifact.

---

## H.4 Retrieval Request Template

Retrieval requests are the formal mechanism by which reviewers, examiners, and institutional operators request evidence from the framework's content-addressed storage. Retrieval requests enforce tiered access controls, purpose limitation, and TTL.

```
retrieval_request:
# --- REQUEST IDENTITY ---
request_id: [unique identifier]
request_timestamp: [UTC]

# --- REQUESTER ---
requester:
  requester_id: [role-based or pseudonymized identifier]
  requester_role: [EXAMINER | AUDITOR | INSTITUTIONAL_REVIEWER |
                  GOVERNANCE_BODY | INCIDENT_INVESTIGATOR |
                  DISPUTE_AUTHORITY]
  requester_institution: [institutional affiliation]

# --- ACCESS PARAMETERS ---
access:
  tier_level: TIER_0 | TIER_1 | TIER_2
  purpose_code: [code from purpose code registry, Section 10.2]
  purpose_description: [human-readable justification]
  ttl_hours: [integer – maximum access duration]
  ttl_expiry: [UTC – computed from request_timestamp + ttl_hours]
```

```

# --- SCOPE ---
scope:
  scope_type: PRODUCT | AUTHORIZATION | CUSTODY_CHAIN | DISPENSATION |
             DECISION | CLAIM | RECONCILIATION | BREAK | RECALL |
             AGGREGATE_STATISTICS
  scope_references: [list of CPO hashes, authorization IDs, event IDs,
                    break IDs, or other identifiers defining the scope]
  time_window:
    start: [UTC]
    end: [UTC]
  evidence_types_requested: [list: PAES, AES, CES, SES, DEP-H, CLM-EP,
                             ILS, PB, RECON_REPORT, ...]

# --- APPROVAL ---
approval:
  approval_required: true | false # Tier 0 may not require approval
  approver_1:
    approver_id: [identifier]
    approval_timestamp: [UTC]
  approver_2: # required for Tier 2
    approver_id: [identifier]
    approval_timestamp: [UTC]
  approval_conditions: [any conditions on the approval, e.g.,
                        "redact patient identifiers"]

# --- DELIVERY ---
delivery:
  delivery_format: EVIDENCE_PACK | INDIVIDUAL_ARTIFACTS | QUERY_RESULTS |
                  AGGREGATE_REPORT
  delivery_channel: [secure channel identifier]
  encryption_required: true
  delivery_timestamp: [UTC – populated at delivery]
  delivery_confirmation: [content_address of delivery receipt]

# --- POST-ACCESS ---

```

```

post_access:
  parp_required: true | false # true for all Tier 2; conditional for Tier 1
  parp_due_date: [UTC]
  parp_reference: [content_address of completed PARP, populated post-review]

# --- AUDIT ---
request_content_address: [self-referential hash]

```

### Retrieval Request Lifecycle:

| Stage                | Event  | SLA  |
|----------------------|--|--|
| REQUEST_SUBMITTED    | Request logged as ILS record   | Immediate  |
| REQUEST_APPROVED     | Approval chain completed (single for Tier 1; dual for Tier 2)                    | Tier 1: 4 hours; Tier 2: 2 hours (emergency) to 24 hours (routine) |
| RETRIEVAL_EXECUTED   | Evidence artifacts retrieved from content-addressed storage; integrity verified  | Per retrieval SLO (Section 9.8)                                    |
| MINIMIZATION_APPLIED | Redaction, pseudonymization, and minimization applied per tier and purpose       | Concurrent with retrieval  |
| EVIDENCE_DELIVERED   | Evidence pack assembled and delivered to requester                               | Per retrieval SLO  |
| ACCESS_EXPIRED       | TTL elapsed; access to delivered evidence governed by retention and purpose code | Automatic at TTL expiry  |
| PARP_COMPLETED       | Post-access review completed and documented                                      | Within 5 business days of access termination                       |

### H.5 Retrieval Response Template

```

retrieval_response:
  response_id: [content_address]
  request_reference: [request_id from retrieval request]

# --- RESULTS ---
results:
  artifacts_requested: [count]
  artifacts_delivered: [count]
  artifacts_unavailable: [count, with reason codes]
  artifacts_redacted: [count – artifacts where redaction was applied]

```

```
# --- INTEGRITY ---
integrity_verification:
  artifacts_verified: [count]
  artifacts_verification_passed: [count]
  artifacts_verification_failed: [count]
  failed_artifact_list:
    - artifact_id: [content_address]
      failure_reason: [hash_mismatch | not_found | corrupted]

# --- MINIMIZATION LOG ---
minimization:
  redaction_applied: true | false
  redaction_method: [AUTOMATED | MANUAL | BOTH]
  redaction_log_reference: [content_address of redaction log]
  pseudonymization_applied: true | false
  fields_redacted: [list of field types redacted]

# --- DELIVERY ---
delivery:
  delivered_at: [UTC]
  delivery_channel: [channel identifier]
  delivery_receipt: [content_address of receipt]
  evidence_pack_manifest: [content_address of delivered pack manifest]

# --- ATTESTATION ---
attestation:
  attesting_officer: [identifier]
  attestation_statement: "The evidence delivered is complete within the
    approved scope, integrity-verified, and minimized per tier and
    purpose requirements."
  attestation_timestamp: [UTC]

response_content_address: [self-referential hash]
```

---

# Appendix I — Offboarding Proof Bundle for Medicines, Health Products, and Clinical Decisions

## I.1 Purpose

The offboarding proof bundle is the comprehensive evidence package generated when a product scope, institutional participant, or operational domain transitions out of the framework. It proves that evidence integrity was maintained through the transition and that the receiving system (or archival storage) accurately reflects the framework's evidence at the point of handover. This appendix provides the complete structure and checklist.

---

## I.2 Offboarding Proof Bundle Manifest

offboarding\_proof\_bundle:

bundle\_id: OPB-[YYYY]-[SEQUENCE]

offboarding\_type: PRODUCT\_SCOPE | PARTICIPANT | PILOT\_CONCLUSION |  
SYSTEM\_DECOMMISSION | REGULATORY\_DIRECTIVE

offboarding\_trigger:

trigger\_type: [per Section 13.1 trigger taxonomy]

trigger\_reference: [governance approval reference]

trigger\_timestamp: [UTC]

# --- SCOPE ---

scope:

products\_in\_scope: [count; list of CPO references]

authorizations\_in\_scope: [count; list of authorization IDs]

custody\_chains\_in\_scope: [count; list of chain references]

dispensation\_events\_in\_scope: [count]

decision\_states\_in\_scope: [count]

claims\_in\_scope: [count, if Section 12 applicable]

preservation\_bundles\_in\_scope: [count; list of PB IDs]

# --- FINAL STATE SNAPSHOT (Section 13.2) ---

final\_snapshot:

product\_evidence\_snapshot:

manifest\_hash: [content\_address]

product\_count: [integer]

authenticity\_state\_distribution:

VERIFIED: [count]  
UNRESOLVED: [count]  
FAILED: [count]  
NOT\_ASSESSED: [count]  
authorization\_evidence\_snapshot:  
  manifest\_hash: [content\_address]  
  authorization\_count: [integer]  
  validity\_state\_distribution:  
    VALID: [count]  
    EXPIRED: [count]  
    SUPERSEDED: [count]  
    REVOKED: [count]  
    SUSPENDED: [count]  
custody\_evidence\_snapshot:  
  manifest\_hash: [content\_address]  
  chain\_count: [integer]  
  chain\_status\_distribution:  
    INTACT: [count]  
    GAPPED: [count]  
    COMPROMISED: [count]  
    RECONSTRUCTED: [count]  
safety\_evidence\_snapshot:  
  manifest\_hash: [content\_address]  
  ses\_count: [integer]  
  safety\_state\_distribution:  
    SUFFICIENT: [count]  
    INSUFFICIENT: [count]  
    SUPERSEDED: [count]  
    DISPUTED: [count]  
reconciliation\_posture\_snapshot:  
  manifest\_hash: [content\_address]  
  last\_reconciliation\_per\_type:  
    - reconciliation\_type: [type]  
      last\_execution: [UTC]  
      result: ALIGNED | BREAK\_DETECTED

```

open_breaks_snapshot:
  open_break_count: [integer]
  breaks_by_severity:
    SEV-1: [count]
    SEV-2: [count]
    SEV-3: [count]
    SEV-4: [count]
  open_breaks_list: [content_address of detailed register]
claim_snapshot: # if Section 12 in scope
  manifest_hash: [content_address]
  pending_claims: [count]
  open_claim_breaks: [count]
master_snapshot_hash: [SHA-256 covering all component hashes above]

# --- FINAL RECONCILIATION (Section 13.3) ---
final_reconciliation:
  report_hash: [content_address of final reconciliation report]
  reconciliation_types_executed: [list]
  alignment_result_per_type:
    - type: [reconciliation_type]
      result: ALIGNED | BREAK_DETECTED
      break_count: [integer]
  resolved_during_final: [count of breaks resolved]
  carried_as_open: [count of breaks carried forward]
  attestation:
    attesting_officer: [identifier]
    attestation_timestamp: [UTC]

# --- LEGACY TRANSITION (Section 13.4) ---
legacy_transition:
  legacy_system_identifier: [target system ID]
  transition_manifest_hash: [content_address of legacy transition manifest]
  mapping_completeness:
    total_artifact_types: [count]
    successfully_mapped: [count]

```

```

    with_data_loss: [count]
    not_mappable: [count]
data_loss_items:
  - artifact_type: [type]
    lost_fields: [list of field names]
    mitigation: [description – typically "archived in framework storage"]
ingestion_verification:
  verification_timestamp: [UTC]
  record_count_match: true | false
  spot_check_result: PASS | FAIL
  verification_attestation: [content_address]

# --- OPEN BREAKS DISCLOSURE (Section 13.6) ---
open_breaks_disclosure:
  disclosure_document_hash: [content_address]
  break_count: [integer]
  governance_approval_for_offboarding_with_breaks:
    approved: true | false
    approval_reference: [governance record content_address]
    risk_acknowledgment: [content_address of risk documentation]
accountable_parties:
  - break_id: [identifier]
    accountable_entity: [role-based identifier]
    post_offboarding_action: [continued_investigation |
                              monitoring | escalation]

# --- ARCHIVAL (Section 13.7) ---
archival:
  archival_storage_reference: [storage location identifier]
  retention_per_category:
    - evidence_category: PRODUCT_AUTHENTICITY
      retention_years: 7
    - evidence_category: AUTHORIZATION
      retention_years: 7
    - evidence_category: CUSTODY

```

```

    retention_years: 7
- evidence_category: SAFETY_DECISION
  retention_years: 10
- evidence_category: CLAIMS
  retention_years: 7
- evidence_category: PRESERVATION_BUNDLES
  retention_years: INDEFINITE
- evidence_category: OFFBOARDING_PROOF_BUNDLE
  retention_years: INDEFINITE
post_offboarding_monitoring:
  monitoring_duration_months: 12
  monitoring_cadence: MONTHLY
  monitoring_responsible: [role-based identifier]

# --- INTEGRITY ---
integrity:
  bundle_hash: [SHA-256 of complete bundle manifest]
  all_component_hashes_verified: true | false
  verification_timestamp: [UTC]

# --- ATTESTATION ---
attestation:
  attesting_officer: [identifier]
  attestation_statement: "This offboarding proof bundle is complete
    and accurate. All evidence within scope has been captured,
    reconciled, and either transitioned to the legacy system or
    archived. Open breaks are disclosed. Data loss items are
    documented with mitigation."
  attestation_timestamp: [UTC]

bundle_content_address: [self-referential hash]

```

---

### I.3 Offboarding Proof Bundle Checklist

| # | Checklist Item                                    | Status | Evidence Reference              |
|---|---|--------|---------------------------------|
| 1 | Pre-offboarding requirements verified (all active | PASS / | [governance approval reference] |

| #  | Checklist Item   | Status            | Evidence Reference                              |
|----|--|-------------------|---|
|    | holds resolved or transferred; governance approval obtained)                 | FAIL              |   |
| 2  | Final state snapshot generated for all evidence categories                   | PASS / FAIL       | [master_snapshot_hash]                          |
| 3  | Final state snapshot integrity verified (master hash computed and confirmed) | PASS / FAIL       | [verification timestamp]                        |
| 4  | Final reconciliation executed across all reconciliation types                | PASS / FAIL       | [final reconciliation report hash]              |
| 5  | All breaks resolved during final reconciliation documented                   | PASS / FAIL       | [resolved break count and references]           |
| 6  | Open breaks disclosed with governance approval for offboarding               | PASS / FAIL / N/A | [disclosure document hash; governance approval] |
| 7  | Legacy transition manifest generated with complete field mapping             | PASS / FAIL       | [transition manifest hash]                      |
| 8  | Data loss assessment completed for non-mappable fields                       | PASS / FAIL       | [data loss items documentation]                 |
| 9  | Evidence transferred to legacy system  | PASS / FAIL       | [transfer records]                              |
| 10 | Post-transfer verification completed (record count match, spot checks)       | PASS / FAIL       | [verification attestation]                      |
| 11 | Non-transferable evidence archived per retention policy                      | PASS / FAIL       | [archival storage reference]                    |
| 12 | Post-offboarding monitoring plan established                                 | PASS / FAIL       | [monitoring schedule reference]                 |
| 13 | Offboarding proof bundle sealed with officer attestation                     | PASS / FAIL       | [attestation timestamp; bundle hash]            |
| 14 | Bundle stored in content-addressed storage with indefinite retention         | PASS / FAIL       | [storage confirmation]                          |

# Appendix J — Reader Navigation Map / Reviewer Jump Table

## J.1 Purpose

This navigation map helps readers locate content by role, task, or concern without reading the entire document sequentially. Each entry identifies the reader profile, the question they are trying to answer, and the section(s) that address it.

## J.2 Navigation by Reader Profile

### Manufacturer / Marketing Authorization Holder:

| Concern                                      | Primary Section                         | Supporting Appendices                                   |
|--|---|---|
| How do I register products in the framework? | Section 4.1 (Canonical Product Objects) | Appendix A (A.1, A.2); Appendix B (B.1 PAES template)   |
| What provenance evidence must I generate?    | Section 4.2 (Provenance Linkage)        | Appendix H (H.2 manifest template)                      |
| What happens during a recall?                | Section 8.2 (Recall State Transitions)  | Appendix C (C.2 BRK-PROV); Appendix F (F.2.2 Recall PB) |
| What are my RACI responsibilities?           | Section 11.2                            | Appendix G (G.2 Product Authenticity RACI)              |

### Distributor / Logistics Provider:

| Concern                                | Primary Section                       | Supporting Appendices              |
|--|---------------------------------------|------------------------------------|
| What custody events must I log?        | Section 6.1 (Custody Event Taxonomy)  | Appendix C (C.4 BRK-CUST)          |
| How do I handle storage excursions?    | Section 6.2 (Storage-State Integrity) | Appendix D (PROV-003, PROV-007)    |
| What evidence do I produce at handoff? | Section 6.3 (Handoff Workflow)        | Appendix B (B.3 CES template)      |
| How do I acknowledge a recall?         | Section 8.2 (CUS_RECALL_ACK)          | Appendix G (G.2 recall activities) |

### Pharmacy / Dispensing Entity:

| Concern                                 | Primary Section   | Supporting Appendices                              |
|---|---|--|
| What must I verify before dispensing?   | Section 6.4 (Dispensation Precondition Gates G1–G7)                     | Appendix D (DISP-001 through DISP-008)             |
| How do I handle a blocked dispensation? | Section 6.4 (Gate failure responses); Section 7.6 (Manual confirmation) | Appendix C (all BRK types that block dispensation) |
| How do I document safety evidence?      | Section 7.2 (Evidence Classes); Section 7.3 (Decision States)           | Appendix B (B.4 SES template)                      |
| What are my RACI responsibilities?      | Section 11.2  | Appendix G (G.3, G.4, G.5)                         |

### Prescriber / Authorizing Clinician:

| Concern                 | Primary Section                          | Supporting Appendices  |
|-------------------------|--|------------------------|
| How is my authorization | Section 5.1 (Authorization as Evidence); | Appendix A (A.3, A.4); |

| <b>Concern</b>                                 | <b>Primary Section</b>  | <b>Supporting Appendices</b>  |
|--|---|-------------------------------|
| modeled?                                       | Section 5.2 (Role-Scope-Product)  | Appendix B (B.2 AES template) |
| What happens if my credentials are restricted? | Section 5.5 (Authority Validation);<br>Section 5.7 (Dispute Escalation) | Appendix C (C.3 BRK-AUTH-004) |
| How do I document an override?                 | Section 7.3 (DS-05); Section 7.4 (Exceptional posture)                  | Appendix D (SAFE-003)         |
| What is the supersession chain?                | Section 5.4 (Supersession Discipline)                                   | Appendix A (A.4 RX states)    |

**Hospital / Institutional Healthcare Facility:**

| <b>Concern</b>                                       | <b>Primary Section</b>                      | <b>Supporting Appendices</b>   |
|--|---|--|
| How do we implement the dispensation gates?          | Section 6.4 (Gate logic)                    | Appendix D (DISP series); Appendix B (B.5 DEP-H template)              |
| How do we handle clinical decision-support evidence? | Section 7.3 (Context-Bound Decision States) | Appendix B (B.4 SES template);<br>Appendix E (EQP-009 through EQP-011) |
| What governance structures do we need?               | Section 11.1 (Governance Body Taxonomy)     | Appendix G (all RACI matrices)   |
| How do we prepare for examiner review?               | Section 14 (Examiner Readiness)             | Appendix D (full checks pack);<br>Appendix E (full query pack)         |

**Benefit Administrator / Payer (Section 12 scope):**

| <b>Concern</b>                            | <b>Primary Section</b>                                | <b>Supporting Appendices</b>                        |
|---|---|---|
| How do I validate a claim?                | Section 12.2 (Claim Evidence Gates CG-1 through CG-6) | Appendix B (B.6 CLM-EP template)                    |
| What is temporal evidence assessment?     | Section 12.2 (Temporal Evidence Assessment paragraph) | Appendix E (EQP-023)                                |
| How do I handle post-payment corrections? | Section 12.6 (Adjustment, Reversal, Rebinding)        | Appendix C (C.6 BRK-CLAIM);<br>Appendix E (EQP-024) |
| What are my RACI responsibilities?        | Section 11.2  | Appendix G (G.8 Claims RACI)                        |

**Examiner / Auditor / Reviewer:**

| <b>Concern</b>                             | <b>Primary Section</b>                                 | <b>Supporting Appendices</b>                                    |
|--|--|---|
| What checks should I perform?              | Section 14 (all subsections)                           | Appendix D (112 checks across 11 domains)                       |
| What queries can I run?                    | Section 14.9 (conceptual queries)                      | Appendix E (24 expanded queries)                                |
| How do I request evidence?                 | Section 10 (Tiered Access);<br>Section 9.8 (Retrieval) | Appendix H (H.4 Retrieval Request template)                     |
| How do I replay a product's history?       | Section 9.9 (Replay Requirements)                      | Appendix E (EQP-001 through EQP-003)                            |
| How do I verify an offboarding was proper? | Section 13; Section 14.8 (Offboarding Checks)          | Appendix I (Offboarding Proof Bundle); Appendix D (OFFB series) |

**Governance Body Member:**

| <b>Concern</b>                            | <b>Primary Section</b>   | <b>Supporting Appendices</b>                |
|---|--|---|
| What decisions require our approval?      | Section 11 (all subsections)   | Appendix G (RACI — "A" column entries)      |
| What triggers recertification?            | Section 11.4 (Material Change Triggers); Section 11.5 (Recert Cadence) | Appendix D (GOVN-001, GOVN-002)             |
| What are the liability triggers?          | Section 11.6 (Liability Trigger Catalog)                               | Appendix D (GOVN-005)                       |
| How do we maintain no-master-key posture? | Section 11.8   | Appendix D (GOVN-003); Appendix E (EQP-020) |

### J.3 Navigation by Task

| <b>Task</b>                              | <b>Start Here</b>                         | <b>Then Reference</b>   |
|--|---|---|
| Onboard a new product into the framework | Section 4.1 (CPO generation)              | Section 4.2 (provenance initiation); Appendix B (B.1 PAES)                          |
| Verify product authenticity at receipt   | Section 4.4 (Minimum replay requirements) | Section 6.1 (CUS_RECEIPT); Appendix D (AUTH-001 through AUTH-005)                   |
| Process a prescription for dispensation  | Section 5.1 (Authorization model)         | Section 6.4 (Gates); Section 7.2 (Safety evidence); Appendix B (B.2 AES, B.5 DEP-H) |
| Handle a dispensation gate failure       | Section 6.4 (Failure responses per gate)  | Section 7.6 (Manual confirmation); Appendix C (relevant break type)                 |
| Respond to a product recall              | Section 8.2 (Recall state machine)        | Section 6.7 (Recall custody continuity); Appendix F (F.2.2 Recall PB)               |
| Investigate a reconciliation break       | Section 9.6 (Break taxonomy and severity) | Appendix C (break code lookup); Appendix F (F.1 PB template)                        |
| Request evidence as a reviewer           | Section 10 (Tiered access)                | Appendix H (H.4 Retrieval request); Section 9.8 (SLOs)                              |
| Prepare for offboarding                  | Section 13 (all subsections)              | Appendix I (Offboarding proof bundle); Appendix D (OFFB series)                     |
| Submit a reimbursement claim             | Section 12.1 (Claim taxonomy)             | Section 12.2 (Evidence gates); Appendix B (B.6 CLM-EP)                              |
| Correct an evidence artifact             | Section 8.3 (Correction pathways)         | Appendix H (H.3 EP Delta template); Section 3.9 (Correction states)                 |

### J.4 Quick Reference: Where to Find Key Concepts

| <b>Concept</b>                          | <b>Primary Definition</b> | <b>Extended Treatment</b>                     |
|---|---------------------------|---|
| Product Authenticity State              | Section 3.1               | Appendix A (A.1)                              |
| Canonical Product Object (CPO)          | Section 4.1               | Appendix B (B.1 PAES template)                |
| Dispensation Precondition Gates (G1–G7) | Section 6.4               | Appendix D (DISP-001); Appendix B (B.5 DEP-H) |
| Proof-of-Safety State                   | Section 3.7               | Appendix A (A.7); Section 7 (full treatment)  |
| Context-Bound Decision State            | Section 7.3               | Appendix B (B.4 SES template)                 |

| <b>Concept</b>             | <b>Primary Definition</b>        | <b>Extended Treatment</b>                         |
|----------------------------|----------------------------------|---|
| EP Delta                   | Section 3.9; Section 5.6         | Appendix H (H.3 template)                         |
| Hold-Only Containment      | Section 8.1                      | Appendix F (F.3 Hold-Set template)                |
| Break Taxonomy             | Section 9.6 (summary)            | Appendix C (complete taxonomy, 41 break types)    |
| Tiered Access (Tier 0/1/2) | Section 10.1                     | Section 3.12; Appendix E (query tier assignments) |
| Supersession Chain         | Section 8.4                      | Section 5.4; Appendix A (all state tables)        |
| Evidence-Linked Settlement | Section 12.2                     | Appendix B (B.6 CLM-EP)                           |
| Offboarding Proof Bundle   | Section 13                       | Appendix I (full manifest and checklist)          |
| RACI Matrices              | Section 11.2                     | Appendix G (7 matrices)                           |
| Standard Checks Pack       | Section 14<br>(representative)   | Appendix D (112 complete checks)                  |
| Examiner Query Pack        | Section 14.9<br>(representative) | Appendix E (24 expanded queries)                  |

## Appendix K — Minimal Glossary (Baseline-First)

### K.1 Glossary Conventions

This glossary follows baseline-first vocabulary discipline: terms defined in Baselines A–E are listed with their baseline origin and used without modification. Healthcare-specific additions are listed separately with explicit justification for why no adequate baseline equivalent exists.

### K.2 Baseline Terms (No Modification)

| Term                                   | Definition   | Baseline Origin   |
|--|--|-------------------|
| Content-Addressed Storage              | Storage where artifacts are identified and retrieved by the cryptographic hash of their content, ensuring integrity verification at retrieval                                  | Baseline C        |
| Disclosure Evidence Pack (DEP)         | Cryptographically secured bundle proving disclosure assertions, with content-addressed artifact references   | Baseline A        |
| EP Delta                               | Incremental evidence artifact documenting a state change, preserving the prior state and linking to the new state through content-addressed references                         | Baselines A, C    |
| Evidence Pack (EP)                     | Standardized collection of documentation, logs, and artifacts demonstrating compliance with operational requirements   | Baselines B, C    |
| Hold-Only Containment                  | Temporary restriction preventing state changes pending investigation or resolution; does not imply fault or violation  | Baseline A        |
| Immutable Log Segment (ILS)            | Tamper-evident, hash-chained log record capturing operational events with timestamps, actor identifiers, and content-addressed integrity                                       | Baselines A, C    |
| Material Change Trigger                | Threshold event requiring notification, re-evaluation, documentation, and potential recertification  | Baselines A, B, D |
| No-Master-Key Posture                  | Design principle prohibiting single-party override capability; all material governance actions require distributed, multi-party authorization                                  | Baselines A, B    |
| Post-Access Review                     | Audit procedure following reviewer evidence retrieval to verify purpose compliance, access scope adherence, and findings documentation   | Baselines C, D    |
| Post-Access Review Pack (PARP)         | Standardized documentation package produced after every Tier 2 access event and selected Tier 1 events, recording scope verification, findings, and data handling confirmation | Baselines C, D    |
| Preservation Bundle (PB)               | Sealed, content-addressed evidence collection assembled for incidents, disputes, recalls, investigations, or legal holds   | Baselines A, C    |
| Purpose Limitation                     | Constraint limiting evidence access and use to a specified regulatory, review, or operational function, documented through purpose codes                                       | Baselines C, D    |
| Recertification (Recert) Cadence       | Periodic validation of control effectiveness, participant capabilities, and governance compliance  | Baselines A, B, D |
| Tiered Supervisory Access (Tier 0/1/2) | Graduated access model: Tier 0 aggregate/statistical; Tier 1 scoped/event-triggered with pseudonymization; Tier 2  | Baselines B, C, D |

| <b>Term</b>                | <b>Definition</b>  | <b>Baseline Origin</b> |
|----------------------------|--|------------------------|
|                            | exceptional reveal with dual-control and mandatory post-access review  |                        |
| TTL (Time-To-Live)         | Temporal access window with automatic expiration; applied to reviewer access grants and proof freshness periods  | Baselines C, D         |
| Verifier Output Pack (VOP) | Standardized artifact recording proof verification results, freshness timestamps, and revocation status references for proof-carrying compliance artifacts | Baseline D             |

### K.3 Healthcare-Specific Additions

| <b>Term</b>                                    | <b>Definition</b>   | <b>Justification</b>  |
|--|---|---|
| Authorization Evidence Set (AES)               | Mapping construct linking prescription, authorization, or issuer legitimacy records to baseline artifact types (EP, ILS, content-addressed manifests)                     | No baseline equivalent for healthcare authorization evidence; adapts DEP concept to clinical authorization                      |
| Canonical Product Object (CPO)                 | Standardized reference record anchoring a specific product-formulation-manufacturer-batch/lot combination, serving as the identity foundation for all downstream evidence | No baseline equivalent for physical product identity; adapts registry record concept from Baseline A                            |
| Claim Evidence Gate (CG-1 through CG-6)        | Structured verification checkpoint that must be satisfied before claim progression from submission to approval  | Adapts DvP precondition gates from Baseline E to claim/reimbursement context  |
| Context-Bound Decision State                   | Evidence record capturing the complete evidence context at the moment a clinical decision was made, enabling independent reviewer reconstruction                          | No baseline equivalent for clinical decision evidence preservation  |
| Custody Evidence Set (CES)                     | Mapping construct linking medicine/product custody records, handoff confirmations, and storage-state logs to baseline artifact types                                      | Adapts Ownership Evidence Set (OES) from Baseline A and Custody Evidence Pack (CEP) from Baseline B to physical product custody |
| Dispensation Evidence Pack (DEP-H)             | Evidence pack produced at dispensation linking all precondition gate results, upstream evidence sets, and dispensation event records                                      | Adapts settlement evidence production from Baseline E to healthcare dispensation  |
| Dispensation Precondition Gate (G1 through G7) | Structured verification checkpoint that must be satisfied before product dispensation proceeds  | Adapts DvP precondition gates from Baseline E to dispensation context   |
| Dispensation State                             | Operationally evidenced condition recording the controlled release of a medicine or health product to its intended recipient  | Adapts settlement state from Baseline E   |
| Product Authenticity Evidence Set (PAES)       | Mapping construct linking product identity, manufacturer origin, batch/lot references, and provenance chain to baseline artifact types                                    | No baseline equivalent for product-level (non-securities) authenticity evidence   |

| <b>Term</b>               | <b>Definition</b>  | <b>Justification</b>  |
|---------------------------|--|---|
| Proof-of-Safety State     | Operationally evidenced condition indicating whether sufficient safety-relevant evidence exists to support a release, dispensation, or review decision | Healthcare-specific state category not present in securities baselines                            |
| Provenance Manifest       | Content-addressed document aggregating all provenance events for a product, enabling full chain verification from manufacture to current custody       | Adapts content-addressed manifest from Baseline C with product-specific provenance event chaining |
| Safety Evidence Set (SES) | Mapping construct linking proof-of-safety records, clinical decision outputs, and safety-relevant assessment artifacts to baseline artifact types      | No baseline equivalent for clinical safety evidence   |

## K.4 Abbreviations

| <b>Abbreviation</b> | <b>Expansion</b>   |
|---------------------|--|
| AES                 | Authorization Evidence Set   |
| BRK                 | Reconciliation Break (prefix for break codes)                      |
| CES                 | Custody Evidence Set   |
| CLM                 | Claim (prefix for claim lifecycle events)                          |
| CLM-EP              | Claim/Reimbursement Evidence Pack                                  |
| CPO                 | Canonical Product Object   |
| CUS                 | Custody (prefix for custody event codes)                           |
| DEP-H               | Dispensation Evidence Pack (Healthcare)                            |
| DS                  | Decision-level safety evidence class (prefix: DS-01 through DS-05) |
| EP                  | Evidence Pack  |
| ILS                 | Immutable Log Segment  |
| LT                  | Liability Trigger (prefix for trigger codes)                       |
| PAES                | Product Authenticity Evidence Set                                  |
| PARP                | Post-Access Review Pack  |
| PB                  | Preservation Bundle  |
| PS                  | Product-level safety evidence class (prefix: PS-01 through PS-05)  |
| SES                 | Safety Evidence Set  |
| SEV                 | Severity (prefix for severity bands: SEV-1 through SEV-4)          |
| TTL                 | Time-To-Live   |
| VOP                 | Verifier Output Pack   |

# Appendix L — Version Lineage, Supersession, and Revocation Templates

## L.1 Purpose

This appendix provides paste-ready templates for tracking version lineage, supersession chains, and revocation records across all state categories in the framework. These templates operationalize the non-destructive preservation principle (Section 3.9, Section 8.5): every state change preserves the prior state, links to the new state through content-addressed references, and maintains a traversable version history.

---

## L.2 Version Lineage Record Template

Every evidence artifact, authorization, product state, or safety assessment that undergoes versioning maintains a version lineage record — an ordered, content-addressed registry of all versions from genesis through current.

version\_lineage:

lineage\_id: VL-[SUBJECT\_TYPE]-[SUBJECT\_REF]-[YYYY]

subject\_type: CPO | AUTHORIZATION | PRESCRIPTION | SAFETY\_PROFILE |  
PROVENANCE\_MANIFEST | CUSTODY\_CHAIN | DECISION\_STATE |  
EVIDENCE\_ARTIFACT | RECONCILIATION\_PROCEDURE |  
GOVERNANCE\_DOCUMENT

subject\_reference: [content\_address of the subject]

subject\_description: [human-readable; e.g., "Prescription RX-2026-04417"]

versions:

- version\_number: 1

version\_hash: [content\_address of version 1]

state\_at\_version: [state value; e.g., RX\_VALID]

created\_at: [UTC]

created\_by: [role-based identifier]

creation\_trigger: GENESIS

ep\_delta\_reference: null # no delta for genesis

status: SUPERSEDED | CORRECTED | REVOKED | CURRENT

- version\_number: 2

version\_hash: [content\_address of version 2]

state\_at\_version: [state value; e.g., RX\_VALID – renewed]

created\_at: [UTC]  
created\_by: [role-based identifier]  
creation\_trigger: RENEWAL | CORRECTION | SUPERSESION |  
SCOPE\_MODIFICATION | FRESHNESS\_REFRESH  
ep\_delta\_reference: [content\_address of EP Delta v1→v2]  
status: SUPERSEDED | CORRECTED | REVOKED | CURRENT

- version\_number: N # ... continued for all versions  
version\_hash: [content\_address]  
state\_at\_version: [state value]  
created\_at: [UTC]  
created\_by: [role-based identifier]  
creation\_trigger: [trigger type]  
ep\_delta\_reference: [content\_address of EP Delta v(N-1)→vN]  
status: CURRENT

current\_reference:  
version\_number: [N – the most recent non-revoked version]  
version\_hash: [content\_address of current version]  
state\_at\_current: [current state value]

lineage\_integrity:  
version\_count: [integer]  
chain\_verified: true | false  
last\_verification\_timestamp: [UTC]

lineage\_content\_address: [self-referential hash]

### **Lineage Operating Rules:**

- A new version is appended (never inserted) to the lineage.
- Each version except genesis references an EP Delta documenting the transition.
- Only one version may have status = CURRENT at any time. If the current version is revoked, status becomes REVOKED and current\_reference is set to null — requiring re-authorization or re-assessment.
- Historical versions remain accessible by version\_number or version\_hash for examiner replay.

- Lineage integrity is verified periodically by confirming that the EP Delta chain is unbroken and that each version's content\_address matches the stored artifact.

---

### L.3 Supersession Chain Template

Supersession chains track the ordered replacement of one artifact or state by a newer version. They are a subset of version lineage focused specifically on replacement relationships.

supersession\_chain:

```
chain_id: SC-[SUBJECT_TYPE]-[SUBJECT_REF]
subject_type: PRESCRIPTION | SAFETY_PROFILE | FORMULARY_VERSION |
              ALGORITHM_VERSION | GOVERNANCE_DOCUMENT |
              PRODUCT_SPECIFICATION | CREDENTIAL
subject_scope: [description of what is being superseded;
               e.g., "Prescription for Patient Q, Product Y"]
```

chain\_entries:

- position: 1
  - artifact\_hash: [content\_address of original]
  - state: SUPERSEDED
  - effective\_from: [UTC]
  - effective\_until: [UTC – when superseded]
  - superseded\_by: [content\_address of position 2]
  - supersession\_reason: [RENEWAL | REPLACEMENT | UPDATE |  
REGULATORY\_CHANGE | CORRECTION]
  - supersession\_authority: [role-based identifier]
- position: 2
  - artifact\_hash: [content\_address of replacement]
  - state: SUPERSEDED
  - effective\_from: [UTC]
  - effective\_until: [UTC]
  - superseded\_by: [content\_address of position 3]
  - supersession\_reason: [reason]
  - supersession\_authority: [identifier]
- position: N # current

```

artifact_hash: [content_address of current]
state: CURRENT
effective_from: [UTC]
effective_until: null # current – no end date
superseded_by: null
supersession_reason: null
supersession_authority: null

```

```

current_position: [N]
current_artifact_hash: [content_address of current version]
chain_length: [integer]
chain_content_address: [self-referential hash]

```

### Supersession Chain Verification Queries:

| Verification         | Method  | Expected Result                             |
|----------------------|---|---|
| Chain completeness   | Traverse from position 1 to N; confirm no gaps  | Every position occupied; no missing entries |
| Linkage integrity    | For each entry, confirm superseded_by matches the next position's artifact_hash               | All forward pointers valid                  |
| Single current       | Count entries with state = CURRENT  | Exactly 1 (or 0 if current is REVOKED)      |
| No orphans           | Confirm every entry except position 1 is referenced as superseded_by from the preceding entry | No unreachable entries                      |
| Temporal consistency | Confirm effective_from of each entry ≥ effective_until of preceding entry                     | No temporal overlaps                        |

## L.4 Revocation Record Template

Revocation records document the permanent invalidation of an evidence artifact, authorization, credential, or product state. Revocation is distinct from supersession: a superseded artifact is replaced by a newer version; a revoked artifact is invalidated without automatic replacement.

revocation\_record:

```

revocation_id: REV-[SUBJECT_TYPE]-[YYYY]-[SEQUENCE]
revoked_artifact:
  artifact_hash: [content_address of revoked artifact]
  artifact_type: [AUTHORIZATION | CREDENTIAL | PROOF_ARTIFACT |
                 PRODUCT_STATE | SAFETY_EVIDENCE | CPO]
  artifact_description: [human-readable]
  state_before_revocation: [state value immediately before revocation]

```

revocation\_details:

revocation\_timestamp: [UTC]

revocation\_authority: [role-based identifier]

authority\_basis: CREDENTIALING\_BODY\_ACTION | GOVERNANCE\_DECISION |  
REGULATORY\_DIRECTIVE | ENFORCEMENT\_ACTION |  
ISSUER\_INITIATED | INTEGRITY\_FAILURE |  
MATERIAL\_CHANGE | SAFETY\_DETERMINATION

revocation\_reason: [plain-language explanation]

revocation\_evidence: [content\_address of supporting evidence]

downstream\_impact:

dependent\_authorizations: [count and list of authorization IDs  
that relied on revoked artifact]

dependent\_dispensation\_events: [count – completed dispensation  
under revoked artifact]

dependent\_claims: [count of pending or paid claims linked]

hold\_actions\_triggered: [count of holds initiated on dependent items]

notification\_records:

- notified\_entity: [identifier]
- notification\_timestamp: [UTC]
- notification\_method: [channel]
- ...

propagation\_status:

propagation\_complete: true | false

items\_propagated: [count]

items\_pending: [count]

propagation\_completion\_target: [UTC]

non\_retroactivity\_note: "This revocation is prospective. Prior verifier output logs, dispensation events, and decisions made in good faith under the now-revoked artifact before the revocation timestamp remain as historical evidence and are not retroactively invalidated."

revocation\_record\_content\_address: [self-referential hash]

### Revocation vs. Correction vs. Supersession — Decision Logic:

| Situation   | Appropriate Action  | Template                   |
|---|---|----------------------------|
| Artifact contains factual error but remains conceptually valid                                    | Correction — new version replaces erroneous version         | EP Delta (Appendix H, H.3) |
| Artifact is replaced by a newer version (e.g., updated prescription, new formulary)               | Supersession — new version takes over as current reference  | Supersession Chain (L.3)   |
| Artifact is permanently invalidated (e.g., credential revoked, product withdrawn, fraud detected) | Revocation — artifact invalidated; no automatic replacement | Revocation Record (L.4)    |
| Artifact is temporarily invalid pending investigation   | Suspension — hold-only containment; not revocation          | Hold-Set (Appendix F, F.3) |

## L.5 Combined Lineage and Revocation Example

**Scenario:** Prescription RX-2026-04417 — lifecycle from issuance through renewal, scope modification, and eventual revocation.

| Version | State      | Trigger   | EP Delta         | Effective Period        |
|---------|------------|---|------------------|-------------------------|
| v1      | RX_VALID   | Genesis (issuance by Dr. K)                                     | None             | 2026-01-15 → 2026-04-15 |
| v2      | RX_VALID   | Renewal (90-day extension by Dr. K)                             | ED-RX-04417-v1v2 | 2026-04-15 → 2026-07-15 |
| v3      | RX_VALID   | Scope modification (quantity reduced per clinical review)       | ED-RX-04417-v2v3 | 2026-05-20 → 2026-07-15 |
| v4      | RX_REVOKED | Revocation (Dr. K credential restriction; governance-initiated) | ED-RX-04417-v3v4 | 2026-06-01 → terminal   |

Version lineage: v1 → v2 (renewal) → v3 (scope mod) → v4 (revoked). Current reference: null (revoked). All prior versions preserved for replay. Dispensation events at v1 and v2 periods remain valid historical evidence. Pending dispensation at v3 was held at revocation; patient referred for re-authorization.

# Appendix M — Scope-of-Use and Authority Matrix (Time / Location / Purpose / Issuer / Release Conditions)

## M.1 Purpose

This appendix provides a comprehensive authority matrix documenting the bound categories (Section 5.3) that constrain every authorization and release action in the framework. The matrix is designed as a paste-ready reference for dispensation systems, compliance functions, and examiner verification.

## M.2 Authorization Bound Matrix — Full

| Bound Category | Bound Definition  | Evidence Field(s)  | Verification Method  | Failure Response  |
|----------------|---|--|--|---|
| Time Bound     | Authorization valid only within defined temporal window                                   | validity_start, validity_end, duration_limit                               | Timestamp comparison: dispensation_time must fall within [validity_start, validity_end]                            | EXPIRED state; dispensation blocked; renewal or re-authorization required               |
| Location Bound | Authorization valid only at specified dispensation locations or jurisdictions             | authorized_locations[], jurisdiction_codes[], setting_types[]              | Location-match: dispensation_point.location compared against authorized_locations                                  | Scope mismatch break (BRK-AUTH-005); dispensation blocked                               |
| Purpose Bound  | Authorization valid only for specified clinical purposes or patient populations           | purpose_codes[], population_restrictions[], indication_codes[]             | Purpose-match: intended use compared against purpose_codes; off-label use triggers DS-05 documentation requirement | Scope mismatch; Exceptional review posture if off-label                                 |
| Quantity Bound | Authorization specifies maximum quantities, refill limits, or dosage ceilings             | max_quantity, max_refills, dosage_ceiling, dispensed_to_date, refills_used | Accumulation check: dispensed_to_date + current_request ≤ max_quantity; refills_used < max_refills                 | Quantity exceeded; dispensation blocked; new authorization required                     |
| Product Bound  | Authorization specific to identified product(s); substitution governed by explicit policy | authorized_products[], substitution_policy, therapeutic_equivalence_flag   | Product-match: dispensation product CPO compared against authorized_products; substitution only if policy permits  | Product mismatch; dispensation blocked unless substitution policy explicitly authorizes |
| Channel        | Authorization   | authorized_channels[],   | Channel-match:   | Channel   |

| <b>Bound Category</b> | <b>Bound Definition</b>   | <b>Evidence Field(s)</b>  | <b>Verification Method</b>  | <b>Failure Response</b>  |
|-----------------------|---|---|---|--|
| Bound                 | valid only when transmitted through recognized channels                         | transmission_record, channel_verification   | prescription received through authorized channel (e.g., electronic prescribing network, institutional order system) | verification failure; dispensation held pending channel confirmation |
| Issuer Bound          | Authorization valid only from issuers meeting credential and scope requirements | issuer_credential_ref, authority_type, scope_attestation, delegation_chain (if delegated) | AES verification per Section 5.5: legitimacy CONFIRMED; scope covers product and setting; credential non-revoked    | Issuer legitimacy failure (BRK-AUTH-003/004); dispensation blocked   |

### M.3 Release Condition Matrix

Release conditions are compound requirements that must all be satisfied before a product may be released for dispensation, transfer, or claim progression. This matrix maps release conditions to their evidence sources and verification mechanisms.

#### Release Conditions for Dispensation (Gates G1–G7 Expanded):

| <b>Release Condition</b>           | <b>Evidence Source</b>               | <b>Verification</b>   | <b>Mandatory / Conditional</b> |
|------------------------------------|--------------------------------------|---|--------------------------------|
| Product authenticity = VERIFIED    | PAES                                 | Complete PAES with provenance manifest COMPLETE; manufacturer identity CONFIRMED; integrity checks PASS | Mandatory for all dispensation |
| Authorization = VALID              | AES                                  | Authorization validity RX_VALID; issuer legitimacy ISSU_CONFIRMED; all bounds verified                  | Mandatory for all dispensation |
| Scope match confirmed              | AES + dispensation parameters        | Each bound category (time, location, purpose, quantity, product, channel, issuer) verified and PASS     | Mandatory for all dispensation |
| Custody chain = INTACT             | CES                                  | No unresolved custody gaps; no unassessed excursions; most recent custody event within freshness window | Mandatory for all dispensation |
| Safety evidence = SUFFICIENT       | SES                                  | All required evidence classes (per Section 7.2 matrix) present and current                              | Mandatory for all dispensation |
| No active hold/recall/quarantine   | Hold/recall/quarantine state records | Product recall/quarantine/hold state = ACTIVE (no hold in effect)                                       | Mandatory for all dispensation |
| Revocation check passed (optional) | VOP or revocation check              | Authorization and product-reference revocation checks passed within                                     | Conditional: mandatory where   |

| Release Condition | Evidence Source | Verification     | Mandatory / Conditional     |
|-------------------|-----------------|------------------|-----------------------------|
|                   | record          | freshness window | Baseline D patterns applied |

**Release Conditions for Claim Progression (Gates CG-1–CG-6):**

| Release Condition                             | Evidence Source          | Verification  | Mandatory / Conditional |
|---|--------------------------|---|-------------------------|
| Dispensation evidence exists                  | DEP-H                    | Valid, content-addressed DEP-H referencing the dispensation event                         | Mandatory               |
| Authorization valid at dispensation time      | AES temporal assessment  | Authorization state was RX_VALID at dispensation timestamp (not at claim submission time) | Mandatory               |
| Product authenticity verified at dispensation | PAES temporal assessment | Authenticity state was AUTH_VERIFIED at dispensation timestamp                            | Mandatory               |
| Safety evidence sufficient at dispensation    | SES temporal assessment  | Safety state was SAFE_SUFFICIENT at dispensation timestamp                                | Mandatory               |
| No active recall at claim submission          | Product state records    | Product not subject to active recall at time of claim submission                          | Mandatory               |
| No duplicate claim                            | Claim records            | No prior paid claim for the same dispensation event                                       | Mandatory               |

**M.4 Authority Delegation Matrix**

When authorization authority is delegated (Section 5.2), the delegation must be documented with scope constraints matching the delegator's own authority boundaries.

| Delegation Attribute               | Requirement  | Evidence   |
|------------------------------------|--|--|
| Delegator authority verified       | Delegator's own AES must show ISSU_CONFIRMED with scope covering the delegated action  | Delegator AES content_address                            |
| Delegation instrument documented   | Formal delegation instrument (protocol, standing order, collaborative practice agreement) recorded as content-addressed artifact | Delegation instrument content_address                    |
| Delegation scope ≤ delegator scope | Delegate's authorized scope cannot exceed delegator's scope on any bound category  | Scope comparison record                                  |
| Delegation temporal validity       | Delegation has defined start/end dates; does not outlive delegator's own credential validity                                     | Delegation validity_start and validity_end               |
| Delegation revocability            | Delegation can be revoked by delegator or governance body at any time; revocation takes effect immediately                       | Revocation mechanism documented in delegation instrument |
| Delegate identity verified         | Delegate's credentials verified and non-revoked at each use of delegated authority   | Delegate credential check at each delegated dispensation |
| Chain depth limit                  | Multi-level delegation (A → B → C) requires  | Governance approval record                               |

| <b>Delegation Attribute</b> | <b>Requirement</b>  | <b>Evidence</b>    |
|-----------------------------|---|--------------------|
|                             | explicit governance approval; maximum chain depth defined by institutional policy | if chain depth > 1 |

# Appendix N — Worked Mini-Scenario Pack (Cross-Domain)

## N.1 Purpose

This appendix provides condensed cross-domain mini-scenarios demonstrating how multiple framework components interact in realistic operational situations. Each scenario is shorter than the full worked examples in Section 15 but focuses on cross-domain linkage — how evidence flows between product, authorization, custody, safety, and claim domains.

## N.2 Mini-Scenario: Formulary Change Triggers Multi-Domain Cascade

**Setup.** Hospital H updates its formulary from version F-v12 to F-v13, effective immediately. F-v13 removes Product A from the approved formulary due to cost-effectiveness review and adds Product B as its replacement.

### Cross-Domain Evidence Cascade:

| Step | Domain                  | Event   | Evidence Generated   |
|------|-------------------------|---|--|
| 1    | Governance              | Formulary change approved by Pharmacy and Therapeutics Committee; material change trigger activated   | MATERIAL_CHANGE ILS record; governance approval; formulary version EP Delta (F-v12 → F-v13)          |
| 2    | Safety                  | All SES records referencing F-v12 for Product A now reference a superseded formulary version; safety state for Product A dispensation transitions to SAFE_SUPERSEDED                                      | Safety evidence supersession records for all active Product A SES artifacts; BRK-FRESH-002 detection |
| 3    | Authorization           | Active prescriptions for Product A reviewed; prescriptions with therapeutic substitution policy = ALLOWED flagged for automatic substitution to Product B; prescriptions without substitution policy held | Authorization review records; substitution eligibility assessment per prescription                   |
| 4    | Dispensation            | Pending dispensation requests for Product A blocked at Gate G5 (safety evidence superseded) until SES refreshed against F-v13   | Gate G5 FAIL records; dispensation holds   |
| 5    | Prescriber notification | Prescribers with active Product A prescriptions without substitution policy notified; re-authorization requested  | Notification records; re-authorization requests  |
| 6    | Claim                   | Pending claims for Product A dispensation events completed before formulary change: unaffected (temporal assessment — safety evidence was SUFFICIENT at dispensation time)                                | No claim holds; temporal assessment confirms pre-change dispensation valid                           |
| 7    | Resolution              | Prescribers re-authorize with Product B; SES refreshed against F-v13 for Product B; dispensation gates pass   | New AES for Product B prescriptions; fresh SES; dispensation proceeds                                |

**Key Insight.** A single governance event (formulary change) generates evidence cascades across 5 domains. The framework's temporal assessment ensures pre-change dispensation and claims are not retroactively invalidated, while post-change dispensation is appropriately held until evidence is refreshed.

### N.3 Mini-Scenario: Cold-Chain Break During Distribution Affects Downstream Dispensation and Claim

**Setup.** A temperature monitoring system at Distributor D detects a 6-hour cold-chain excursion affecting 200 units of Product C (a biologic requiring 2–8°C storage) during overnight storage.

#### Cross-Domain Evidence Cascade:

| Step | Domain       | Event  | Evidence Generated   |
|------|--------------|--|--|
| 1    | Custody      | CUS_TEMP_EXCURSION detected; excursion classified as Moderate (6h, peak 14°C)  | Excursion detection record; severity assessment                                      |
| 2    | Custody      | Hold-only containment applied to all 200 units   | CUS_HOLD_ENTRY for 200 units   |
| 3    | Provenance   | Provenance manifest annotated with excursion event; provenance state remains PROV_COMPLETE but with excursion flag   | Provenance manifest update   |
| 4    | Safety       | PS-03 (storage condition compliance) flagged as non-compliant for affected units; proof-of-safety state → SAFE_INSUFFICIENT                                  | SES update; BRK-SAFE break for storage condition non-compliance                      |
| 5    | Custody      | Quality assessment performed: manufacturer stability data indicates Product C tolerates ≤12h at ≤15°C without potency impact; 6h at 14°C is within tolerance | Quality assessment record (content-addressed); manufacturer stability data reference |
| 6    | Custody      | Hold released based on quality assessment; excursion assessment record links to manufacturer data  | CUS_HOLD_RELEASE with quality assessment evidence; excursion assessment record       |
| 7    | Safety       | PS-03 updated with excursion assessment result; safety state → SAFE_SUFFICIENT (with documented excursion and assessment)                                    | SES refresh; excursion-assessed PS-03  |
| 8    | Dispensation | Units released for dispensation; dispensation gates pass with note that PS-03 includes assessed excursion  | Dispensation proceeds normally; DEP-H includes excursion assessment reference        |
| 9    | Claim        | Claims for dispensation of affected units process normally; excursion assessment evidence is part of the evidence chain                                      | No claim impact; evidence chain complete   |

**Key Insight.** The excursion triggered appropriate containment (hold-only), but did not result in product loss because the quality assessment confirmed acceptability. The complete evidence chain — excursion detection, hold, assessment, release — is preserved and available for examiner replay.

## N.4 Mini-Scenario: Credential Revocation Discovered During Claim Adjudication

**Setup.** Benefit Administrator B is adjudicating claim CLM-2026-11203 for dispensation of Product D. During CG-2 (Authorization Linkage) evaluation, the gate engine discovers that the prescriber's credential was revoked 2 days before the dispensation event — meaning the dispensation itself may have been unauthorized.

### Cross-Domain Evidence Cascade:

| Step | Domain        | Event  | Evidence Generated   |
|------|---------------|--|--|
| 1    | Claim         | CG-2 temporal assessment: prescriber credential revoked before dispensation timestamp; gate FAIL   | Gate CG-2 failure record: "ISSU_REVOKED pre-dispensation"            |
| 2    | Claim         | Claim denied (CLM_DENIED); reason: authorization invalid at dispensation time  | CLM_DENIED record with BRK-AUTH-002 reference                        |
| 3    | Authorization | Retroactive review triggered: all dispensation events by this prescriber in the window between credential revocation and system detection identified | BRK-AUTH-004 detection; affected dispensation inventory              |
| 4    | Dispensation  | All affected dispensation events flagged for post-dispensation review; patient notification assessment initiated                                     | Post-dispensation review records; notification assessment            |
| 5    | Safety        | Clinical assessment of affected patients: were dispensed products appropriate regardless of prescriber credential status?                            | Clinical review records (Tier 1 access under PUR-SAFETY-INCIDENT)    |
| 6    | Governance    | Liability trigger LT-03 activated: authorization by entity with revoked credentials  | LT-03 record; Preservation Bundle initiated; governance notification |
| 7    | Claim         | All claims referencing this prescriber during the affected window reviewed; additional denials or adjustments as appropriate                         | Claim review records; CLM_DENIED or CLM_ADJUSTED for affected claims |
| 8    | Governance    | Root cause investigation: why was credential revocation not detected at dispensation time? Freshness window review                                   | Investigation report; control improvement recommendations            |

**Key Insight.** The claim adjudication process served as a secondary detection point for an authorization integrity failure. The temporal assessment correctly identified that the credential was revoked before dispensation — unlike worked example 15.6, where revocation occurred after dispensation and the claim was appropriately approved.

## N.5 Mini-Scenario: Examiner Requests Cross-Domain Replay for Adverse Event Investigation

**Setup.** An adverse event report is received for Patient E who received Product F at Hospital H. The examiner requests a complete cross-domain replay to understand what happened.

### Replay Sequence:

| Replay Domain    | Examiner Query  | Evidence Retrieved   | Tier   |
|------------------|---|--|--------|
| Product          | "Show authenticity and provenance for the dispensed unit of Product F" (EQP-001, EQP-003) | PAES: AUTH_VERIFIED; provenance chain COMPLETE from manufacturer through Hospital H; no breaks detected  | Tier 1 |
| Authorization    | "Show authorization lifecycle for the prescription" (EQP-004)                             | AES: issuer ISSU_CONFIRMED at dispensation; prescription RX_VALID; scope match confirmed; no supersession  | Tier 1 |
| Custody          | "Show custody chain for this specific unit" (EQP-003 adapted)                             | CES: CUST_INTACT; storage conditions compliant; no excursions; handoff chain complete  | Tier 1 |
| Safety           | "Show safety evidence at dispensation time" (EQP-010)                                     | SES: SAFE_SUFFICIENT; all required evidence classes present; no alerts overridden; DS-01 contraindication check CLEAR; DS-02 interaction check CLEAR | Tier 1 |
| Dispensation     | "Show complete dispensation record"   | DEP-H: all gates G1–G7 PASS; standard review posture; dispensation executed normally   | Tier 1 |
| Decision context | "Was there any clinical decision-support involvement?"                                    | No context-bound decision state for this dispensation (standard dispensation; no alerts triggered)   | Tier 1 |

**Examiner Conclusion.** Cross-domain replay confirms that all operational evidence was present, current, and consistent at dispensation time. The adverse event is not attributable to an evidence gap, authorization failure, custody compromise, or safety evidence deficiency. The adverse event investigation proceeds through clinical channels (outside framework scope) with the assurance that the operational evidence layer functioned as intended.

## N.6 Mini-Scenario: Offboarding with Open Breaks

**Setup.** Distributor D is exiting the framework. During final reconciliation, 3 open breaks are detected: 2 BRK-FRESH-003 (stale custody evidence for products in long-term storage) and 1 BRK-PROV-006 (aggregation hierarchy break for a repackaged lot).

### Offboarding Sequence:

| Step | Action  | Evidence                                       |
|------|---|--|
| 1    | Final reconciliation detects 3 breaks; BRK-FRESH-003 (x2) classified SEV-4; BRK-PROV-006 classified SEV-3 | Final reconciliation report with break details |
| 2    | SEV-4 breaks: custody evidence refreshed through manual   | CUS_STORAGE verification                       |

| <b>Step</b> | <b>Action</b>  | <b>Evidence</b>   |
|-------------|--|---|
|             | verification; breaks resolved  | events; break closure records                               |
| 3           | SEV-3 break: aggregation investigation initiated but cannot be completed before offboarding deadline (requires manufacturer records not yet available) | Investigation partial results; manufacturer records request |
| 4           | Open breaks disclosure prepared: 1 unresolved break (BRK-PROV-006); governance approval requested for offboarding with open break                      | Open breaks disclosure document; risk assessment            |
| 5           | Governance approves offboarding with open break; Distributor D assigned as accountable party for post-offboarding resolution                           | Governance approval record; accountability assignment       |
| 6           | Offboarding proof bundle generated with open break disclosure; legacy transition executed  | OPB manifest with open break section populated              |
| 7           | Post-offboarding monitoring: break tracked in open breaks register; manufacturer records received at T+15d; break resolved                             | Break resolution record; open breaks register closure       |

# Appendix O — Materiality & Escalation Matrix for Product, Authorization, Custody, and Safety Breaks

## O.1 Purpose

This appendix provides a unified materiality and escalation matrix that defines — for each break domain — the thresholds that determine when a break escalates from routine handling to governance notification, Tier 2 access, preservation bundle generation, or regulatory notification. The matrix complements the break taxonomy (Appendix C) and severity classification (C.9) with escalation-specific criteria.

## O.2 Materiality Thresholds by Domain

### Product Authenticity and Provenance Breaks:

| Escalation Level             | Materiality Threshold  | Trigger Examples  |
|------------------------------|--|---|
| Routine handling             | Isolated SEV-4 break; single product unit; no downstream dispensation  | Minor metadata discrepancy in provenance event; timestamp precision mismatch                                |
| Enhanced investigation       | SEV-3 break; or SEV-4 break recurring 3+ times in 30 days for same product category                            | Aggregation hierarchy gap for a repackaged lot; repeated batch/lot reference discrepancies from same source |
| Governance notification      | Any SEV-2 break; or SEV-3 break unresolved beyond SLA; or pattern affecting 3+ products from same manufacturer | Batch/lot mismatch at receipt for narrow therapeutic index product; provenance chain hash break             |
| Preservation Bundle + Tier 2 | Any SEV-1 break; or SEV-2 break with counterfeit/substitution indicators                                       | Manufacturer identity mismatch; duplicate unit identifier; confirmed hash chain tampering                   |
| Regulatory notification      | Confirmed counterfeit detection; confirmed supply chain compromise affecting public safety                     | BRK-PROV-003 confirmed as counterfeit; BRK-PROV-005 confirmed as duplicate indicating parallel supply chain |

### Authorization and Issuer Legitimacy Breaks:

| Escalation Level        | Materiality Threshold   | Trigger Examples  |
|-------------------------|---|---|
| Routine handling        | Isolated freshness break for low-risk authorization type; no pending dispensation                             | BRK-FRESH-001 for standing order review cadence slightly overdue                              |
| Enhanced investigation  | Scope mismatch detected at dispensation; or delegation instrument expired without renewal                     | BRK-AUTH-005 minor scope variation; BRK-AUTH-007 delegation expired by <7 days                |
| Governance notification | Revoked issuer with active prescriptions; dispensation bound to expired authorization at time of dispensation | BRK-AUTH-004 issuer credential revoked; BRK-AUTH-001 dispensation under expired authorization |

| <b>Escalation Level</b>      | <b>Materiality Threshold</b>   | <b>Trigger Examples</b>   |
|------------------------------|--|---|
| Preservation Bundle + Tier 2 | Dispensation under pre-dispensation revoked authorization; or credential fraud suspected | BRK-AUTH-002 confirmed; suspected fraudulent credential use         |
| Regulatory notification      | Systematic unauthorized prescribing; credential fraud confirmed                          | Pattern of dispensation under forged or misappropriated credentials |

**Custody and Storage Breaks:**

| <b>Escalation Level</b>      | <b>Materiality Threshold</b>  | <b>Trigger Examples</b>   |
|------------------------------|---|---|
| Routine handling             | Minor quantity discrepancy (<1%) at handoff; stale custody evidence within 2x freshness threshold     | BRK-CUST-004 with 0.5% variance; BRK-CUST-006 minor staleness                                   |
| Enhanced investigation       | Moderate storage excursion for condition-sensitive product; unmatched handoff persisting >24h         | BRK-CUST-003 moderate excursion; BRK-CUST-001 unresolved >24h                                   |
| Governance notification      | Product identity mismatch at receipt; unauthorized actor in custody chain; critical storage excursion | BRK-CUST-005; BRK-CUST-002; severe/critical excursion   |
| Preservation Bundle + Tier 2 | Confirmed product substitution; deliberate custody chain manipulation                                 | BRK-CUST-005 confirmed substitution; BRK-CUST-002 unauthorized access with custody modification |
| Regulatory notification      | Confirmed product diversion; systematic custody integrity failure                                     | Pattern of unauthorized custody events; confirmed diversion network                             |

**Safety Evidence Breaks:**

| <b>Escalation Level</b>      | <b>Materiality Threshold</b>  | <b>Trigger Examples</b>   |
|------------------------------|---|---|
| Routine handling             | Supplementary evidence class stale; minor formulary version lag for non-critical product                                  | BRK-SAFE-002 minor update for standard product                                      |
| Enhanced investigation       | Required evidence class absent for completed dispensation; safety alert overridden without documentation                  | BRK-SAFE-001 for DS-01 or DS-02; BRK-SAFE-003                                       |
| Governance notification      | Pattern of undocumented overrides from same dispensation point; deprecated algorithm version affecting multiple decisions | BRK-SAFE-003 recurrent; BRK-SAFE-004 with error-flagged version                     |
| Preservation Bundle + Tier 2 | Conflicting safety evidence classes unresolved; patient safety incident linked to safety evidence gap                     | BRK-SAFE-005 with hold-only containment; adverse event correlated with BRK-SAFE-001 |
| Regulatory notification      | Systematic safety evidence failures suggesting institutional control breakdown  | Pattern of dispensation without required safety checks across multiple products     |

### O.3 Escalation Response Matrix (Unified)

| Escalation Level             | Notification Target  | SLA   | Required Actions   | Evidence Produced   |
|------------------------------|--|---|--|---|
| Routine handling             | Operational management only                                  | Per break severity SLA (Appendix C, C.10)                                       | Standard break resolution workflow   | Break record; resolution record; closure record                             |
| Enhanced investigation       | Operational management + surveillance function               | Within 24h of detection   | Dedicated investigation assignment; root cause analysis; control review  | Investigation report; RCA; control improvement recommendations              |
| Governance notification      | Governance body (Steering Committee or Change Control Board) | Within 8h for SEV-2; within 2h for SEV-1  | Governance briefing; resource allocation; coordination with affected parties; potential recertification assessment | Governance notification record; briefing materials; action plan             |
| Preservation Bundle + Tier 2 | Governance body + regulatory liaison function                | Tier 2 access within 2h (emergency) to 24h (standard); PB initiated immediately | Full investigation under Tier 2 access; preservation of all evidence; coordination with regulatory liaison         | Preservation Bundle per Appendix F; Tier 2 access records; PARP             |
| Regulatory notification      | External regulatory authority per institutional policy       | Per institutional regulatory notification procedures                            | Regulatory communication; evidence production per regulatory request; ongoing coordination                         | Regulatory notification record; evidence production records; correspondence |

### O.4 Recurrence Escalation Rules

Recurrence of the same break type within a defined window triggers automatic escalation regardless of individual break severity.

| Recurrence Pattern   | Auto-Escalation                                       | Rationale   |
|--|---|---|
| Same break code, same scope, 3+ times in 30 days                   | Escalate one level above individual break handling    | Pattern suggests systemic issue, not isolated incident            |
| Same break code, different scope, 5+ times in 30 days              | Escalate to governance notification                   | Broad pattern suggests control framework weakness                 |
| Any SEV-2+ break from same participant/entity, 3+ times in 90 days | Governance review + recertification assessment        | Recurring material breaks indicate participant control deficiency |
| Any break type, same product category, 10+ times in 90 days        | Governance review + product-category-level assessment | Category-wide issue requiring systemic investigation              |
| Tier 2 access for same   | Governance exception-creep review                     | Repeated Tier 2 access may  |

| <b>Recurrence Pattern</b>        | <b>Auto-Escalation</b>       | <b>Rationale</b>   |
|----------------------------------|------------------------------|--|
| participant, 3+ times in 90 days | per Baseline D (Section 2.5) | indicate surveillance creep or persistent control failures |

## O.5 Escalation Decision Tree (Paste-Ready)

Break detected

- |
- |— Assess individual severity per Appendix C taxonomy
  - | — Apply aggravating/mitigating factors per C.9
- |
- |— Check recurrence pattern
  - | — If recurrence threshold met → auto-escalate per 0.4
- |
- |— Determine materiality per 0.2 domain-specific thresholds
  - | — Map to escalation level
- |
- |— Execute response per 0.3 unified matrix
  - | — Routine → standard resolution workflow
  - | — Enhanced → dedicated investigation
  - | — Governance → briefing + action plan
  - | — PB + Tier 2 → full investigation + preservation
  - | — Regulatory → external notification + coordination
- |
- |— Document escalation decision in break record
  - | — Include: severity, materiality assessment, recurrence check, escalation level determined, rationale

# Appendix P — Optional Claim / Reimbursement Linkage Templates (Only if Section 12 Is Included)

## P.1 Purpose and Conditionality

This appendix is included only when Section 12 (Financially Consequential Workflows) is in scope. It provides paste-ready linkage templates connecting claim/reimbursement events to their underlying product, authorization, dispensation, and safety evidence. These templates operationalize the evidence-linked settlement confirmation principle from Baseline E: financially consequential actions should not proceed when evidence states are materially unresolved.

---

## P.2 Claim-to-Dispensation Linkage Template

Every claim must be traceable to a specific dispensation event through content-addressed references. This template defines the minimum linkage structure.

claim\_dispensation\_linkage:

linkage\_id: CDL-[CLAIM\_ID]

claim\_reference:

claim\_id: [identifier]

claim\_submission\_timestamp: [UTC]

claimant\_reference: [pseudonymized]

dispensation\_reference:

dispensation\_event\_id: [content\_address]

dispensation\_timestamp: [UTC]

dep\_h\_manifest: [content\_address of DEP-H]

upstream\_evidence\_chain:

paes\_at\_dispensation:

manifest\_hash: [content\_address]

authenticity\_state: [AUTH\_ value at dispensation time]

aes\_at\_dispensation:

manifest\_hash: [content\_address]

issuer\_legitimacy: [ISSU\_ value at dispensation time]

prescription\_validity: [RX\_ value at dispensation time]

ces\_at\_dispensation:

manifest\_hash: [content\_address]

custody\_state: [CUST\_ value at dispensation time]

ses\_at\_dispensation:

manifest\_hash: [content\_address]

```
safety_state: [SAFE_ value at dispensation time]
temporal_assessment:
  assessment_method: STATE_AT_DISPENSATION_TIME
  assessment_timestamp: [UTC – when temporal assessment was performed]
  authorization_valid_at_dispensation: true | false
  product_verified_at_dispensation: true | false
  safety_sufficient_at_dispensation: true | false
  custody_intact_at_dispensation: true | false
gate_results:
  CG-1_dispensation_evidence: PASS | FAIL
  CG-2_authorization_linkage: PASS | FAIL
  CG-3_product_authenticity: PASS | FAIL
  CG-4_safety_evidence: PASS | FAIL
  CG-5_no_active_recall: PASS | FAIL
  CG-6_no_duplicate: PASS | FAIL
linkage_integrity:
  all_references_verified: true | false
  verification_timestamp: [UTC]
linkage_content_address: [self-referential hash]
```

---

### **P.3 Claim Adjustment Linkage Template**

When a previously paid claim is adjusted (CLM\_ADJUSTED) or reversed (CLM\_REVERSED), the adjustment must be linked to the upstream evidence change that triggered it.

```
claim_adjustment_linkage:
  linkage_id: CAL-[CLAIM_ID]-[ADJUSTMENT_SEQUENCE]
  original_claim:
    claim_id: [identifier]
    original_status: CLM_PAID
    original_payout_amount: [value]
    original_payout_timestamp: [UTC]
  adjustment:
    adjustment_type: CLM_ADJUSTED | CLM_REVERSED
    adjustment_amount: [value – positive for underpayment correction,
                        negative for overpayment recovery, full amount
                        for reversal]
```



---

## P.4 Claim Open Breaks Register Template

The claim open breaks register tracks all unresolved breaks in the claim/reimbursement domain, adapted from Baseline E's settlement open breaks register.

claim\_open\_breaks\_register:

register\_id: COBR-[YYYY]-[PERIOD]

period:

start: [UTC]

end: [UTC]

summary:

total\_open\_breaks: [integer]

breaks\_by\_type:

BRK-CLAIM-001: [count]

BRK-CLAIM-002: [count]

BRK-CLAIM-003: [count]

BRK-CLAIM-004: [count]

BRK-CLAIM-005: [count]

BRK-CLAIM-006: [count]

breaks\_by\_severity:

SEV-1: [count]

SEV-2: [count]

SEV-3: [count]

SEV-4: [count]

oldest\_open\_break\_age\_days: [integer]

breaks\_exceeding\_sla: [count]

entries:

- break\_id: [identifier]

break\_code: [BRK-CLAIM-NNN]

severity: [SEV-N]

detected\_at: [UTC]

age\_days: [integer]

sla\_status: WITHIN\_SLA | SLA\_BREACHED

affected\_claim\_id: [identifier]

affected\_amount: [value]

assigned\_to: [role-based identifier]

investigation\_status: PENDING | IN\_PROGRESS | AWAITING\_EVIDENCE

resolution\_target\_date: [UTC]

- ... [repeated for each open break]

register\_content\_address: [self-referential hash]

register\_generated\_at: [UTC]

### Register Maintenance Rules:

| Rule                    | Requirement   |
|-------------------------|---|
| Update cadence          | Updated at each claim reconciliation cycle and whenever a break is detected or resolved                                     |
| Aging escalation        | Breaks exceeding SLA trigger automatic governance notification per Appendix O   |
| Offboarding requirement | Register must show zero open breaks — or governance-approved exception — before claim scope offboarding (Section 13.6)      |
| Examiner accessibility  | Register retrievable through EQP-012 (adapted for claims); Tier 0 for aggregate counts; Tier 1 for individual break details |

## P.5 Claim Evidence Completeness Scorecard Template

For periodic reporting and governance review, the claim evidence completeness scorecard summarizes the evidence quality posture across claim populations.

| Metric                                      | Calculation  | Target                                       | Reporting Cadence        |
|---|--|--|--------------------------|
| Gate pass rate (overall)                    | Claims where all CG gates passed / Total claims validated  | ≥98%   | Monthly                  |
| Gate pass rate per gate (CG-1 through CG-6) | Claims passing each specific gate / Total claims evaluated at that gate                                      | ≥99% per gate                                | Monthly                  |
| Temporal assessment accuracy                | Claims where temporal assessment correctly evaluated state at dispensation time / Total temporal assessments | 100%   | Quarterly (sample-based) |
| Adjustment rate                             | $\text{CLM\_ADJUSTED} + \text{CLM\_REVERSED} / \text{Total CLM\_PAID}$                                       | <2% (target varies by institutional context) | Monthly                  |
| Open break aging                            | Average age of open claim breaks in days   | <10 days                                     | Monthly                  |
| Recovery completion rate                    | $\text{Recovery COMPLETED} / \text{Total recovery INITIATED}$  | ≥90% within 90 days                          | Quarterly                |
| Duplicate detection rate                    | Duplicates detected before payment / Total duplicates identified (pre + post payment)                        | ≥95%   | Quarterly                |

# Appendix Q — Proof-Based Minimization and Verifier Output Templates

## Q.1 Purpose

This appendix provides templates for proof-based verification artifacts where Baseline D's programmable privacy patterns are applied. These templates enable bounded verification — confirming operational states without exposing underlying evidence — through Verifier Output Packs (VOPs) and minimized disclosure records.

---

## Q.2 Verifier Output Pack (VOP) Template — Healthcare Application

The VOP records the result of a proof-based verification for a healthcare operational state. It adapts the VOP structure from Baseline D (Section 7.3) to healthcare evidence domains.

verifier\_output\_pack:

vop\_id: [content\_address]

verification\_subject:

subject\_type: PRODUCT\_AUTHENTICITY | ISSUER\_LEGITIMACY |  
PRESCRIPTION\_VALIDITY | CUSTODY\_INTEGRITY |  
SAFETY\_SUFFICIENCY | RECALL\_STATUS |  
CLAIM\_GATE\_COMPLIANCE

subject\_reference: [content\_address of the subject being verified]

claim\_asserted:

claim\_type: [e.g., "Product authenticity state = VERIFIED" or  
"Issuer holds prescribing authority for product  
category X within jurisdiction Y"]

claim\_bounded: true # always true – claims are bounded assertions,  
# not raw attribute disclosures

verification\_result:

result: PASS | FAIL | STALE | REVOKED

result\_timestamp: [UTC]

verifier\_id: [pseudonymized or role-based identifier of verifying  
component]

freshness:

proof\_generation\_timestamp: [UTC]

validity\_window\_end: [UTC]

freshness\_status: CURRENT | EXPIRING | EXPIRED

```

revocation:
  revocation_check_timestamp: [UTC]
  revocation_list_version: [reference to revocation list consulted]
  revocation_status: CLEAR | REVOKED | UNAVAILABLE
evidence_mapping:
  evidence_pack_references:
    - pack_type: [PAES | AES | CES | SES | DEP-H]
      manifest_hash: [content_address]
  tier_level_of_output: TIER_0 | TIER_1
    # VOPs are Tier 0 or Tier 1 outputs by design;
    # Tier 2 accesses the underlying evidence directly
disclosure_minimization:
  raw_attributes_exposed: NONE
    # VOPs assert bounded claims; no raw institutional,
    # patient, or commercial data exposed
  minimization_method: PROOF_CARRYING_ARTIFACT |
    SELECTIVE_DISCLOSURE | RANGE_PROOF |
    PASS_FAIL_ATTESTATION
integrity:
  vop_content_address: [self-referential hash]
  stored_as: ILS # per Baseline D convention

```

### Q.3 VOP Application Matrix — Healthcare Verification Scenarios

| Verification Scenario                 | Claim Asserted  | Underlying Evidence (Not Exposed)  | VOP Output (Exposed)                                 |
|---------------------------------------|---|--|--|
| Product authenticity at dispensation  | "Product authenticity state = VERIFIED for CPO [reference]"       | Complete PAES: manufacturer credential, provenance manifest, integrity checks            | PASS/FAIL + freshness status + revocation status     |
| Issuer authority for product category | "Issuer holds authority for [product category] in [jurisdiction]" | Full issuer credential, license details, scope attestation, practice address             | PASS/FAIL + freshness status                         |
| Prescription validity at dispensation | "Prescription [reference] validity = VALID at [timestamp]"        | Full prescription record, issuer AES, scope details, patient reference                   | PASS/FAIL + freshness status + revocation status     |
| Custody chain integrity               | "Custody chain INTACT for product [reference]"                    | Complete custody event chain, storage condition logs, handoff records, excursion details | PASS/FAIL + chain event count + last event timestamp |
| Safety evidence sufficiency           | "Safety evidence SUFFICIENT for                                   | All PS and DS evidence classes, clinical decision-                                       | PASS/FAIL + evidence class count +                   |

| Verification Scenario   | Claim Asserted                                     | Underlying Evidence (Not Exposed)   | VOP Output (Exposed)                   |
|-------------------------|--|---|--|
|                         | dispensation [reference]"                          | support outputs, patient parameters   | freshness status                       |
| Recall status clearance | "Product [reference] not subject to active recall" | Product recall/hold records, recall scope determinations, batch/lot linkage           | PASS/FAIL (ACTIVE or RECALLED)         |
| Claim gate compliance   | "All CG gates passed for claim [reference]"        | Dispensation evidence, authorization temporal assessment, full evidence linkage chain | PASS/FAIL per gate + overall PASS/FAIL |

**Reviewer Interaction with VOPs:**

- At **Tier 0**, reviewers see aggregate VOP statistics: pass rates, freshness compliance percentages, revocation check success rates — no individual VOP detail.
- At **Tier 1**, reviewers access individual VOP records for specific products, authorizations, or dispensation events — seeing the bounded claim, result, freshness, and revocation status, but not the underlying evidence.
- At **Tier 2**, reviewers bypass the VOP layer and access the underlying evidence directly under standard Tier 2 controls.

**Q.4 Minimized Disclosure Record Template**

When a reviewer query can be answered through a minimized disclosure — providing less detail than full Tier 1 access while providing more than a simple VOP PASS/FAIL — a minimized disclosure record is generated.

minimized\_disclosure\_record:

```

record_id: [content_address]
query_reference: [retrieval_request_id that triggered this disclosure]
disclosure_tier: TIER_1_MINIMIZED
purpose_code: [from purpose code registry]
ttl: [hours]
disclosed_fields:
- field_category: PRODUCT_IDENTITY
  disclosed: product_category, batch_lot_reference, authenticity_state
  withheld: manufacturer_commercial_terms, pricing, supply_chain_details
- field_category: AUTHORIZATION
  disclosed: authorization_type, validity_state, scope_summary
  withheld: prescriber_name, license_number, practice_address
- field_category: CUSTODY

```

```

disclosed: chain_status, event_count, last_event_type,
last_event_timestamp

withheld: custodian_commercial_identity, facility_address,
transport_details

- field_category: SAFETY

disclosed: safety_state, evidence_class_presence (PS/DS), override_flag
withheld: patient_parameters, clinical_notes, raw_decision_inputs

- field_category: CLAIM

disclosed: claim_status, gate_results_summary, payout_status
withheld: patient_identity, pricing_details, benefit_plan_specifics

minimization_attestation:

attesting_officer: [identifier]

attestation: "Only fields necessary for the documented purpose
have been disclosed. Withheld fields are not relevant to the
review purpose and have been excluded per minimization
discipline."

attestation_timestamp: [UTC]

record_content_address: [self-referential hash]

```

---

## Q.5 Stale-Proof and Failed-Proof Handling Templates

When a VOP returns STALE, REVOKED, or FAIL, structured handling templates ensure consistent response.

| VOP Result                                 | Handling Template                         | Default Action   | Escalation Path  |
|--|---|--|--|
| PASS                                       | No action template needed                 | Operation proceeds; VOP stored as evidence   | None   |
| STALE                                      | Stale-proof refresh workflow              | Block dependent operation; initiate re-verification; if re-verification PASS → proceed; if FAIL → escalate | Tier 1 if re-verification unavailable within SLA         |
| REVOKED                                    | Revoked-proof containment workflow        | Block dependent operation; hold-only containment; identify dependent actions                               | Tier 1 immediate; Tier 2 if enforcement indicator        |
| FAIL                                       | Failed-proof investigation workflow       | Block dependent operation; hold-only containment; investigation of failure cause                           | Tier 1; Tier 2 if pattern detected or safety implication |
| UNAVAILABLE (revocation check unreachable) | Conservative-fail workflow per Baseline D | Treat as FAIL; block dependent operation; hold-only pending revocation service restoration                 | Tier 1 after grace period per Baseline D                 |

---

# Appendix R — Cross-Border Portability and Conflict-of-Process Mini-Scenarios

## R.1 Purpose and Conditionality

This appendix is included because cross-border scenarios — medicines manufactured in one jurisdiction, distributed in another, dispensed in a third — are operationally common even if the framework's primary scope is domestic. These mini-scenarios illustrate how the framework's evidence artifacts can be assessed for portability and where conflict-of-process issues arise. No cross-border regulatory framework is proposed or assumed; all scenarios use "alignment objectives" framing.

## R.2 Mini-Scenario: Imported Medicine — Provenance Evidence from Foreign Manufacturer

**Setup.** Hospital H in Jurisdiction A receives Product G manufactured by Manufacturer M in Jurisdiction B. Product G has provenance evidence generated under Jurisdiction B's product tracking system, which uses different evidence formats and content-addressing standards than this framework.

### Conflict-of-Process Points:

| Issue                                | Framework Requirement                                     | Jurisdiction B Reality   | Resolution Approach  |
|--------------------------------------|---|--|--|
| Provenance manifest format           | Content-addressed manifest per Section 4.3                | Jurisdiction B uses proprietary XML serialization format without content addressing        | Mapping layer: import Jurisdiction B provenance events into framework manifest structure; generate content addresses at import; document format conversion in provenance annotation  |
| Manufacturer credential verification | AES with issuer legitimacy ISSU_CONFIRMED per Section 5.5 | Jurisdiction B credentials use different credentialing standards and revocation mechanisms | Equivalence assessment: document whether Jurisdiction B credentialing meets alignment objectives; if equivalent, generate AES with equivalence_assessed flag; if not equivalent, manufacturer identity state = ISSU_UNVERIFIED pending supplemental verification |
| Storage condition evidence format    | Continuous condition logs per Section 6.2                 | Jurisdiction B requires only periodic batch attestation, not continuous monitoring         | Evidence gap documented: CES annotated with "storage_monitoring = PERIODIC_ATTESTATION (Jurisdiction B standard)"; institutional quality function assesses acceptability; if accepted, provenance state PROV_COMPLETE with annotation; if not, PROV_PARTIAL      |
| Custody chain                        | CUS_HANDOFF from  | Border transit   | Border transit documented as explicit  |

| Issue                | Framework Requirement                            | Jurisdiction B Reality   | Resolution Approach  |
|----------------------|--|--|--|
| continuity at border | Jurisdiction B entity to Jurisdiction A importer | may introduce custody gap (customs hold, inspection, repackaging for local labeling) | custody events: CUS_HANDOFF → CUS_HOLD_ENTRY (customs) → CUS_HOLD_RELEASE → CUS_RECEIPT by importer; any gaps documented per BRK-PROV-001 handling |

**Evidence Artifacts Produced:**

- Provenance manifest with cross-border annotation and format conversion documentation.
- AES with equivalence assessment flag for foreign manufacturer credential.
- CES with border transit custody events explicitly documented.
- Quality assessment record documenting institutional acceptance of foreign storage evidence standard.

### R.3 Mini-Scenario: Prescription Issued in Jurisdiction A, Dispensation in Jurisdiction B

**Setup.** Patient P holds a prescription issued by Dr. K in Jurisdiction A. Patient P travels to Jurisdiction B and requests dispensation at Pharmacy Q. The prescription references Dr. K's credentials under Jurisdiction A's credentialing system.

**Conflict-of-Process Points:**

| Issue                          | Framework Requirement   | Conflict   | Resolution Approach   |
|--------------------------------|---|--|---|
| Issuer legitimacy verification | AES with ISSU_CONFIRMED per Jurisdiction B standards                                | Jurisdiction B cannot verify Jurisdiction A credentials directly   | Pharmacy Q treats authorization as ISSU_UNVERIFIED; dispensation blocked at Gate G2; escalation pathway: Pharmacy Q contacts Jurisdiction A credentialing body (if mutual recognition exists) or refers patient to local prescriber |
| Prescription scope validity    | Location bound: authorized_locations must include Jurisdiction B                    | Prescription was issued with Jurisdiction A locations only   | Scope mismatch detected (BRK-AUTH-005); dispensation blocked; resolution: prescriber issues cross-jurisdiction authorization amendment, or local prescriber issues new prescription   |
| Product equivalence            | Product bound: authorized_products may reference Jurisdiction A product identifiers | Product available in Jurisdiction B may have different product identifier, different formulation brand, or different packaging | Product-match verification requires cross-reference between Jurisdiction A product identifier and Jurisdiction B equivalent; therapeutic substitution policy evaluated  |

| Issue                       | Framework Requirement   | Conflict   | Resolution Approach   |
|-----------------------------|---|--|---|
| Safety evidence portability | SES references Jurisdiction A formulary and interaction databases | Jurisdiction B uses different formulary and interaction data sources | Safety evidence regenerated against Jurisdiction B sources at Jurisdiction B dispensation point; SES refreshed; new DS-01 and DS-02 generated locally |

**Key Insight.** Cross-border prescription portability is not automatic within the framework. Each bound category must be independently verified against the dispensation jurisdiction's requirements. The framework does not assert that cross-border dispensation should be permitted — it provides the evidence architecture to document what was verified, what was not, and what gaps exist.

## R.4 Mini-Scenario: Recall Notification Crossing Jurisdictional Boundaries

**Setup.** Manufacturer M in Jurisdiction A issues a recall for Product H, Batch LOT-2026-1200. Product H was distributed to Distributors in Jurisdictions A, B, and C. Each jurisdiction has different recall notification requirements and response timelines.

### Cross-Border Recall Evidence Challenges:

| Challenge   | Framework Response  |
|---|---|
| Different recall notification formats across jurisdictions  | Framework recall notification record (Section 8.2) serves as the canonical notification; jurisdiction-specific formatted notifications generated as translations with linkage to the canonical record |
| Different acknowledgment SLAs across jurisdictions  | CUS_RECALL_ACK tracked per custody holder with jurisdiction-specific SLA notation; SLA compliance assessed per jurisdiction   |
| Different disposition requirements (Jurisdiction B requires destruction; Jurisdiction C permits return to manufacturer) | Disposition events (CUS_DESTRUCTION or CUS_RETURN) documented per jurisdiction-specific requirement; custody chain reflects actual disposition with jurisdiction-specific regulatory reference        |
| Consolidated recall closure requires cross-jurisdiction scope reconciliation  | Recall closure report aggregates responses from all jurisdictions; each jurisdiction's affected units tracked separately; consolidated scope shows total units in scope vs. total accounted for       |

### Evidence Artifacts Produced:

- Canonical recall notification record with jurisdiction-specific translation references.
- Per-jurisdiction CUS\_RECALL\_ACK tracking with jurisdiction-specific SLA notation.
- Per-jurisdiction disposition evidence (destruction or return) with regulatory reference.
- Consolidated recall closure report with cross-jurisdiction scope reconciliation.

# Appendix S — Confidence / Corroboration Bands for Reviewer Use

## S.1 Purpose

When reviewers assess evidence artifacts, they encounter varying levels of evidence strength. This appendix defines confidence and corroboration bands — structured categories that help reviewers calibrate their assessment without making legal determinations. Confidence bands describe the strength of individual evidence artifacts; corroboration bands describe the alignment across multiple independent evidence sources.

## S.2 Confidence Bands for Individual Evidence Artifacts

| Band | Label               | Definition   | Applicable When   | Reviewer Action   |
|------|---------------------|--|---|---|
| CB-1 | High Confidence     | Evidence artifact is content-addressed, integrity-verified, within freshness window, generated by a conformance-tested source, and consistent with related artifacts   | PAES complete with provenance COMPLETE and all integrity checks PASS; AES with ISSU_CONFIRMED and currency within freshness; SES with all required classes present and current                    | Standard reliance; no additional verification needed for the specific evidence dimension  |
| CB-2 | Moderate Confidence | Evidence artifact is present and integrity-verified but has one or more qualification: approaching freshness expiry, generated by a source not yet conformance-tested, or minor inconsistency with related artifact that does not rise to a reconciliation break | AES where freshness status = EXPIRING; CES where storage condition monitoring used periodic attestation rather than continuous; VOP result PASS but revocation list version is one behind current | Noted qualification; reviewer may proceed but should document the qualification in review findings  |
| CB-3 | Low Confidence      | Evidence artifact is present but has material qualifications: exceeds freshness window, source conformance not verified, format conversion applied (cross-border import), or partial completeness  | AES where freshness EXPIRED; provenance manifest PARTIAL with documented gap; cross-border evidence with equivalence_assessed flag but equivalence not confirmed                                  | Enhanced scrutiny; reviewer should request supplemental evidence or escalate to Tier 1 investigation if relying on this evidence for a material determination |
| CB-4 | Insufficient        | Evidence artifact is absent, integrity-failed, or fundamentally incomplete;  | PAES missing for dispensed product; CES with CUST_COMPROMISED   | Evidence does not support operational state;  |

| Band | Label | Definition  | Applicable When                                | Reviewer Action   |
|------|-------|---|--|---|
|      |       | cannot support the operational state it is supposed to evidence | status; AES with ISSU_REVOKED; VOP result FAIL | hold-only containment or denial (depending on context); break generated |

### S.3 Corroboration Bands for Cross-Source Alignment

| Band   | Label                      | Definition   | Applicable When   |
|--------|----------------------------|--|---|
| CORR-1 | Fully Corroborated         | Multiple independent evidence sources agree on the operational state; no source contradicts; all sources within freshness                | Product authenticity confirmed by manufacturer provenance AND custody chain verification AND receiving entity independent check   |
| CORR-2 | Substantially Corroborated | Primary evidence source confirmed; one or more secondary sources support but with minor qualification (freshness lag, format difference) | AES confirms issuer legitimacy; credentialing body reference supports but revocation list is one version behind   |
| CORR-3 | Partially Corroborated     | Primary evidence source confirmed; but one or more expected secondary sources are absent or inconclusive                                 | Provenance manifest COMPLETE but storage condition evidence available only as periodic attestation (not continuous monitoring); manufacturer identity confirmed but through imported credential with equivalence assessment |
| CORR-4 | Uncorroborated             | Single evidence source only; no independent corroboration available  | Product authenticity based solely on packaging inspection without electronic provenance verification; authorization based solely on paper prescription without issuer credential verification                               |
| CORR-5 | Contradicted               | Two or more evidence sources produce conflicting assessments of the same operational state   | Product CPO indicates Batch A; custody chain receipt indicates Batch B; or issuer credential shows CONFIRMED while revocation registry shows REVOKED  |

#### Reviewer Application Guidance:

- CORR-1 and CORR-2 support standard operational reliance.
- CORR-3 warrants documented qualification in review findings; may be acceptable for lower-risk operational decisions.
- CORR-4 should trigger enhanced scrutiny; single-source reliance for high-impact decisions (dispensation of narrow therapeutic index products, high-value claim approval) requires documented justification.
- CORR-5 triggers DISPUTED state per the applicable state taxonomy (Section 3); hold-only containment; reconciliation break generated; investigation per Appendix C break handling.

## S.4 Confidence-Corroborator Cross-Reference

|                     | <b>CORR-1<br/>(Fully)</b>  | <b>CORR-2<br/>(Substantially)</b>                  | <b>CORR-3<br/>(Partially)</b>                            | <b>CORR-4<br/>(Uncorroborated)</b>  | <b>CORR-5<br/>(Contradicted)</b>                  |
|---------------------|--|--|--|---|---|
| CB-1 (High)         | Strongest posture; standard reliance   | Strong posture; note minor secondary qualification | Adequate for routine decisions; document gap             | Unusual — high-confidence single source warrants investigation of missing corroboration | Immediate investigation; break generated          |
| CB-2 (Moderate)     | Good posture; note primary qualification   | Acceptable; document qualifications                | Enhanced scrutiny recommended                            | Document single-source reliance with justification                                      | Hold-only; investigation                          |
| CB-3 (Low)          | Unusual combination; investigate why corroboration is strong but primary evidence weak | Review secondary sources for compensating strength | Marginal; consider hold or supplemental evidence request | Insufficient for material decisions; hold recommended                                   | Immediate hold; SEV-2+ break                      |
| CB-4 (Insufficient) | N/A — absent/failed primary evidence   | N/A  | N/A  | Break generated regardless  | Break generated; SEV-1 if contradicted and absent |

# Appendix T — Performance and SLA / SLO Reference Tables

## T.1 Purpose

This appendix consolidates all performance targets, service level agreements (SLAs), and service level objectives (SLOs) referenced throughout the framework into a single reference. Targets are operational alignment objectives, not binding commitments; institutional participants calibrate actual targets through governance processes.

## T.2 Evidence Retrieval SLOs

| Request Type  | Target Response Time                          | Escalation if Exceeded                                       |
|---|---|--|
| Standard examiner query (single product/authorization/event)            | ≤48 hours                                     | Governance notification at 72 hours                          |
| Comprehensive review (multi-product, cross-domain)                      | ≤5 business days                              | Governance notification at 7 business days                   |
| Emergency retrieval (safety incident, active recall, regulatory demand) | ≤4 hours                                      | Immediate governance and regulatory notification if exceeded |
| Dispute-related evidence production (per party)                         | ≤48 hours                                     | Dispute authority notified at 72 hours                       |
| Offboarding evidence production   | Per offboarding timeline (typically ≤30 days) | Governance review if timeline at risk                        |

## T.3 Reconciliation Execution SLOs

| Reconciliation Type                  | Default Cadence  | Maximum Acceptable Delay                 |
|--------------------------------------|--|--|
| Provenance-Custody Alignment         | Continuous alerts; daily batch                             | 24 hours beyond scheduled batch          |
| Authorization-Dispensation Alignment | At each dispensation; daily batch                          | Dispensation: real-time; batch: 24 hours |
| Safety Evidence Currency             | Per institutional cadence (alignment: daily for high-risk) | 48 hours beyond scheduled cycle          |
| Claim-Evidence Alignment             | At submission; at adjudication                             | 24 hours beyond submission               |
| Aggregate Holdings Reconciliation    | Weekly batch   | 7 days beyond scheduled batch            |
| Offboarding Reconciliation           | At initiation and completion                               | Per offboarding timeline                 |

## T.4 Break Resolution SLAs

| Break Severity   | Containment SLA | Investigation SLA | Full Resolution SLA                  |
|------------------|-----------------|-------------------|--------------------------------------|
| SEV-1 (Critical) | ≤15 minutes     | ≤48 hours         | Case-dependent; governance oversight |

| <b>Break Severity</b> | <b>Containment SLA</b>    | <b>Investigation SLA</b> | <b>Full Resolution SLA</b> |
|-----------------------|---------------------------|--------------------------|----------------------------|
| SEV-2 (High)          | ≤1 hour                   | ≤5 business days         | ≤10 business days          |
| SEV-3 (Moderate)      | ≤4 hours                  | ≤10 business days        | ≤30 business days          |
| SEV-4 (Low)           | Next reconciliation cycle | ≤30 business days        | ≤30 business days          |

## T.5 Tiered Access SLAs

| <b>Access Action</b>                 | <b>SLA</b>                               | <b>Escalation</b>  |
|--------------------------------------|--|--|
| Tier 1 approval                      | ≤4 hours from request                    | Auto-escalation to secondary approver at 8 hours                   |
| Tier 2 approval (routine)            | ≤24 hours from request                   | Governance notification at 48 hours                                |
| Tier 2 approval (emergency)          | ≤2 hours from request                    | Alternate approver activated at 3 hours                            |
| Post-access review (PARP) completion | ≤5 business days from access termination | Compliance alert at 7 business days; governance notification at 10 |
| TTL expiry enforcement               | Automatic at TTL endpoint                | Overdue access generates ACCS compliance alert                     |

## T.6 Recall Response SLAs

| <b>Recall Action</b>                  | <b>SLA</b>  | <b>Escalation</b>  |
|---------------------------------------|---|--|
| Recall notification issuance          | ≤4 hours from recall determination                              | Immediate governance notification if delayed                                     |
| Custody holder acknowledgment         | ≤48 hours from notification receipt                             | Escalation to recall authority at 72 hours; regulatory consideration at 96 hours |
| Quarantine of affected units          | ≤24 hours from acknowledgment                                   | Governance notification if not quarantined within 48 hours                       |
| Recall scope reconciliation (interim) | Weekly during active recall                                     | Governance review at each interim  |
| Recall closure                        | When 100% units accounted for; or governance-approved exception | Governance escalation if >90 days without closure                                |

## T.7 Governance Response SLAs

| <b>Governance Action</b>              | <b>SLA</b>   | <b>Escalation</b>   |
|---------------------------------------|--|---|
| Material change trigger documentation | ≤24 hours from trigger detection                               | Auto-alert to governance body at 48 hours                                       |
| Material change governance response   | ≤5 business days from trigger documentation                    | Steering Committee notification at 10 business days                             |
| Recertification cycle completion      | Per cadence schedule (annual, semi-annual, quarterly per type) | Governance alert at 30 days overdue; operational restriction at 60 days overdue |

| <b>Governance Action</b>                       | <b>SLA</b>                        | <b>Escalation</b>                                 |
|--|-----------------------------------|---|
| Liability trigger response (SEV-1)             | ≤2 hours from detection           | Immediate regulatory liaison activation           |
| Liability trigger response (SEV-2)             | ≤8 hours from detection           | Governance body notification                      |
| Change Control Board review of proposed change | ≤10 business days from submission | Steering Committee escalation at 20 business days |

## T.8 Evidence Integrity Verification SLOs

| <b>Verification Type</b>                              | <b>Cadence</b>  | <b>Target</b>  | <b>Escalation</b>                            |
|---|---|--|--|
| Hash chain verification (custody events)              | Per reconciliation cadence                                  | 100% verification pass rate                              | Any failure → BRK-INTEG-002; SEV-1           |
| Content-address verification (stored artifacts)       | Weekly sample (10% of active artifacts) + full scan monthly | 100% verification pass rate                              | Any failure → BRK-INTEG-001; SEV-1           |
| Manifest self-referential hash verification           | At each manifest access and monthly full scan               | 100% pass rate   | Any failure → BRK-INTEG-004; SEV-1           |
| Evidence chain-of-custody completeness                | Quarterly audit (sample-based)                              | 100% of sampled artifacts have complete chain-of-custody | Gaps → RECON-008 check failure               |
| Replication lag (between primary and replica storage) | Continuous monitoring                                       | ≤15 minutes for critical evidence; ≤1 hour for standard  | Lag exceeding threshold → availability alert |

## T.9 Offboarding SLOs

| <b>Offboarding Activity</b>            | <b>SLO</b>   | <b>Escalation</b>  |
|--|--|--|
| Final state snapshot generation        | ≤5 business days from offboarding initiation       | Governance notification if delayed                       |
| Final reconciliation execution         | ≤10 business days from snapshot completion         | Governance escalation at 15 business days                |
| Legacy transition manifest generation  | ≤10 business days from reconciliation completion   | Governance notification if delayed                       |
| Evidence transfer to legacy system     | Per offboarding plan (typically ≤15 business days) | Governance review if transfer at risk                    |
| Post-transfer verification             | ≤5 business days from transfer completion          | Offboarding cannot close without verification            |
| Post-offboarding monitoring initiation | Immediate upon offboarding completion              | Governance alert if not initiated within 5 business days |

## T.10 Consolidated SLA/SLO Summary by Domain

| <b>Domain</b> | <b>Critical SLA</b> | <b>Most Impactful SLO</b> | <b>Governance Escalation Trigger</b> |
|---------------|---------------------|---------------------------|--------------------------------------|
| Evidence      | Emergency: 4 hours  | Standard query: 48 hours  | >72 hours without                    |

| <b>Domain</b>      | <b>Critical SLA</b>                               | <b>Most Impactful SLO</b>                   | <b>Governance Escalation Trigger</b>         |
|--------------------|---|---|--|
| retrieval          |   |   | response                                     |
| Reconciliation     | Continuous for critical; daily batch for standard | No reconciliation cycle missed by >24 hours | 2+ consecutive cycles missed                 |
| Break resolution   | SEV-1 containment: 15 minutes                     | SEV-2 full resolution: 10 business days     | Any SEV-1 unresolved >48 hours               |
| Tiered access      | Emergency Tier 2: 2 hours                         | PARP completion: 5 business days            | PARP overdue >10 business days               |
| Recall             | Notification: 4 hours; acknowledgment: 48 hours   | Closure: 100% units accounted               | >90 days without closure                     |
| Governance         | LT SEV-1 response: 2 hours                        | Recertification on schedule                 | >60 days overdue recertification             |
| Evidence integrity | Any failure: immediate containment                | 100% verification pass rate                 | Any integrity failure (SEV-1)                |
| Offboarding        | Per plan; typically 30–60 days total              | Post-transfer verification: 5 business days | Verification incomplete at offboarding close |

# Appendix U — Adversarial Failure Patterns, Abuse Cases, and Containment Logic for Product Authenticity, Authorization, Custody, Proof-of-Safety, and Claim Workflows

## U.0 Purpose and Reader Orientation

This appendix identifies, classifies, and operationalizes adversarial failure patterns and abuse cases that the framework must detect, contain, preserve, replay, and correct. It goes beyond the reconciliation break taxonomy (Appendix C) by focusing on intentional or structurally adversarial conditions — not merely operational mismatches. Each pattern maps to detection logic, severity, containment, preservation, replay, corrective response, and governance controls.

**Reader path:** Operators start at U.1–U.3 for pattern recognition. Incident responders focus on U.5–U.7. Governance bodies use U.8–U.10. Examiners use U.11 for worked adversarial cases and U.12 for action routing.

## U.1 Failure and Abuse Taxonomy

**Failure Taxonomy Table:**

| Failure Class               | Code         | Definition   | Distinguishing Feature   |
|-----------------------------|--------------|--|--|
| Operational failure         | FAIL-OPS     | Unintentional system error, configuration mistake, or process deviation        | No intent; correctable through standard break resolution                         |
| Data integrity failure      | FAIL-INTEG   | Evidence artifact tampered, corrupted, or silently overwritten                 | May be intentional or accidental; requires forensic investigation                |
| Adversarial injection       | FAIL-ADV-INJ | False or fabricated evidence introduced into the evidence chain                | Intentional; designed to deceive downstream consumers                            |
| Adversarial suppression     | FAIL-ADV-SUP | Legitimate evidence withheld, deleted, or rendered inaccessible                | Intentional concealment; may mask counterfeit, diversion, or unauthorized action |
| Authority abuse             | FAIL-AUTH-AB | Legitimate credentials used outside authorized scope, time, or purpose         | Actor holds valid credentials but exceeds bounds                                 |
| Reviewer access abuse       | FAIL-REV-AB  | Tiered access used outside documented purpose, scope, or TTL                   | Surveillance creep, unauthorized data extraction, or scope violation             |
| Collusion pattern           | FAIL-COLLU   | Multiple actors coordinating to circumvent controls                            | Requires multi-party detection; individual actions may appear legitimate         |
| Replay / duplication attack | FAIL-REPLAY  | Previously valid evidence or authorization reused outside its intended context | Exploits absence of freshness or nonce controls                                  |

## U.2 Adversarial Abuse Pattern Families

**Abuse Pattern Table:**

| Pattern ID | Pattern Name                  | Domain               | Description  | Target Control   |
|------------|-------------------------------|----------------------|--|--|
| ABP-001    | Counterfeit product insertion | Product authenticity | Fabricated CPO or provenance manifest introduced to legitimize counterfeit product                 | PAES integrity; provenance chain verification                    |
| ABP-002    | Provenance chain forgery      | Provenance           | Fabricated custody events inserted into provenance manifest to fill gaps or create false chain     | Hash chain verification; actor credential check                  |
| ABP-003    | Credential impersonation      | Authorization        | Forged or stolen issuer credentials used to generate authorizations                                | AES issuer legitimacy; revocation check freshness                |
| ABP-004    | Prescription replay           | Authorization        | Expired, superseded, or consumed prescription re-presented for additional dispensation             | Supersession chain; quantity bound tracking; freshness check     |
| ABP-005    | Custody diversion             | Custody              | Products diverted from legitimate custody chain through undocumented handoffs                      | Custody event completeness; handoff pair matching                |
| ABP-006    | Safety evidence fabrication   | Proof-of-safety      | Fabricated DS or PS evidence classes created to satisfy dispensation gates                         | SES integrity verification; source version cross-check           |
| ABP-007    | Claim duplication             | Claims               | Same dispensation event claimed multiple times under different claim identifiers                   | CG-6 duplicate detection; dispensation-claim linkage uniqueness  |
| ABP-008    | Reviewer scope creep          | Bounded review       | Tier 1 or Tier 2 access used to extract data beyond approved scope or purpose                      | Purpose code enforcement; PARP scope verification                |
| ABP-009    | Silent evidence overwrite     | Evidence integrity   | Evidence artifact modified post-storage without EP Delta generation                                | Content-address verification; periodic hash scan                 |
| ABP-010    | Collusive release bypass      | Dispensation         | Multiple actors collaborate to bypass dispensation precondition gates through coordinated override | Override documentation review; separation-of-duties verification |

## U.3 Detection Logic and Control Triggers

**Detection Trigger Matrix:**

| <b>Pattern ID</b> | <b>Primary Detection Method</b>  | <b>Secondary Detection</b>  | <b>Automated?</b>   | <b>Trigger Event Code</b>                 |
|-------------------|--|---|---|---|
| ABP-001           | Content-address mismatch between CPO and manufacturer registry   | Cross-reference with external product identification systems                                    | Yes   | BRK-INTEG-001 or BRK-PROV-003             |
| ABP-002           | Hash chain break in provenance manifest; actor credential not in authorized registry                                   | Temporal sequence analysis (events out of logical order)  | Yes   | BRK-INTEG-002 or BRK-PROV-002             |
| ABP-003           | AES revocation check returns REVOKED or credential hash mismatch   | Credential usage pattern anomaly (issuing from unusual location/time)                           | Yes (revocation); pattern analysis semi-automated                     | BRK-AUTH-002 or BRK-AUTH-003              |
| ABP-004           | Quantity bound exceeded; supersession chain shows SUPERSEDED or EXPIRED  | Dispensation event referencing authorization already fully consumed                             | Yes   | BRK-AUTH-001 or quantity threshold breach |
| ABP-005           | Custody gap (CUS_HANDOFF without matching CUS_RECEIPT); product appears at unexpected location                         | Aggregate quantity reconciliation: units in custody chain $\neq$ units released by manufacturer | Partial (gap detection automated; location anomaly requires analysis) | BRK-CUST-001 or BRK-PROV-001              |
| ABP-006           | SES evidence class references source version that does not exist or was not current at claimed timestamp               | Cross-check DS output against CDSS audit log for claimed algorithm version                      | Partial   | BRK-SAFE-001 or BRK-INTEG-001             |
| ABP-007           | Duplicate dispensation reference across multiple claim IDs   | Claim-dispensation linkage uniqueness constraint violation                                      | Yes   | BRK-CLAIM-003                             |
| ABP-008           | PARP scope review identifies data accessed outside approved purpose code   | Access log analysis: artifacts accessed not in approved scope definition                        | Post-hoc (PARP review)  | ACCS compliance alert                     |
| ABP-009           | Periodic hash verification detects content-address mismatch for stored artifact  | EP Delta chain discontinuity: artifact version changed without delta record                     | Yes (hash scan)   | BRK-INTEG-005; liability trigger LT-07    |
| ABP-010           | Override documentation review: multiple overrides from same dispensation point in short window with same approver pair | Separation-of-duties analysis: override approver is also the dispensing actor                   | Post-hoc (audit)  | DISP check failures; governance alert     |

## U.4 Severity Bands and Materiality Framework

### Severity and Materiality Matrix:

| Pattern ID | Base Severity    | Aggravating Factors (Escalate +1)   | Materiality Threshold                               | Preservation Required    |
|------------|------------------|---|---|--------------------------|
| ABP-001    | SEV-1 (Critical) | Multiple units; narrow therapeutic index product; distribution already commenced          | Any confirmed instance                              | Always — PB mandatory    |
| ABP-002    | SEV-1 (Critical) | Affects chain segment already used for dispensation                                       | Any confirmed instance                              | Always                   |
| ABP-003    | SEV-1 (Critical) | Dispensation already completed under forged credentials; patient harm potential           | Any confirmed instance                              | Always                   |
| ABP-004    | SEV-2 (High)     | Controlled substance; pattern across multiple pharmacies                                  | ≥2 instances from same authorization                | Yes if SEV-1 or repeated |
| ABP-005    | SEV-2 (High)     | Cold-chain product; high-value product; pattern across multiple lots                      | ≥1 confirmed diversion event                        | Yes                      |
| ABP-006    | SEV-2 (High)     | High-impact decision context; override based on fabricated evidence                       | Any confirmed fabrication                           | Yes                      |
| ABP-007    | SEV-2 (High)     | Amount exceeds institutional threshold; pattern from same claimant                        | ≥2 duplicates from same source in 90 days           | Yes if pattern detected  |
| ABP-008    | SEV-2 (High)     | Sensitive data accessed (patient identity, commercial terms); repeated pattern            | Any confirmed scope violation at Tier 2             | Yes                      |
| ABP-009    | SEV-1 (Critical) | Affects evidence supporting active dispensation or claim; deliberate tampering indicators | Any confirmed instance                              | Always                   |
| ABP-010    | SEV-2 (High)     | Controlled substance; bypassed safety gates; patient harm potential                       | ≥3 coordinated overrides in 30 days from same point | Yes                      |

## U.5 Containment Logic

### Containment Logic Table:

| Pattern ID | Immediate Containment                                      | Scope Determination  | Hold Duration   | Release Condition   |
|------------|--|--|---|---|
| ABP-001    | Quarantine all units with matching CPO; block dispensation | All units from same batch/lot; trace aggregation hierarchy | Until investigation complete; governance approval for release | Counterfeit determination: destroy. Not counterfeit: release with correction EP Delta |
| ABP-002    | Hold-only on all   | Products whose   | Until chain repaired or                                       | Valid provenance  |

| <b>Pattern ID</b> | <b>Immediate Containment</b>  | <b>Scope Determination</b>  | <b>Hold Duration</b>   | <b>Release Condition</b>   |
|-------------------|---|---|--|--|
|                   | products in affected chain segment  | provenance manifest includes the forged event(s)                                      | products re-verified through independent evidence                      | established through alternative evidence; governance approval  |
| ABP-003           | Hold all pending dispensation under affected authorizations; flag completed dispensation for review | All authorizations issued by the impersonated credential                              | Until credential fraud confirmed or denied                             | Fraud denied: release. Fraud confirmed: all authorizations revoked; patient notification             |
| ABP-004           | Block further dispensation under the replayed authorization   | Single authorization + all dispensation points that processed it                      | Until quantity reconciliation confirms actual dispensation count       | Quantity reconciled; excess dispensation investigated  |
| ABP-005           | Hold-only on all products last known in the diverted segment  | Products in custody gap segment; potentially broader if quantity discrepancy detected | Until products located and verified or loss confirmed                  | Products verified at known location; or loss documented with governance approval                     |
| ABP-006           | Hold on dispensation events relying on fabricated evidence; re-assess safety                        | Dispensation events where SES references the fabricated artifact                      | Until legitimate safety evidence regenerated                           | Fresh SES generated from verified source; dispensation re-assessed                                   |
| ABP-007           | Hold both claims; block payout on duplicates  | All claims referencing the same dispensation event                                    | Until duplicate confirmed and one claim denied                         | Investigation determines legitimate claim; duplicate denied  |
| ABP-008           | Terminate active access session; revoke access grant  | Single access event + review of other access by same reviewer in rolling 90 days      | Access terminated immediately; investigation period per governance SLA | PARP completed; scope violation assessed; disciplinary or corrective action per institutional policy |
| ABP-009           | Hold all dependent operational states; recover valid version from backup                            | All states and downstream actions referencing the overwritten artifact                | Until valid version restored and dependent states re-verified          | Valid version restored; integrity confirmed; dependent states re-assessed                            |
| ABP-010           | Suspend override authority at affected dispensation point; hold pending dispensation                | All dispensation events approved through the suspected collusive pattern              | Until separation-of-duties audit completed                             | Audit confirms no collusion: restore authority. Collusion confirmed: institutional corrective action |

## U.6 Preservation and Replay Requirements

### Preservation Requirement Matrix:

| Pattern ID          | PB Trigger                              | Minimum PB Contents   | Retention   |
|---------------------|---|---|---|
| ABP-001             | Confirmed or suspected counterfeit      | CPO evidence; provenance manifest; PAES; manufacturer communication; quarantine records; investigation report                         | Indefinite  |
| ABP-002             | Confirmed hash chain forgery            | Original and forged provenance events; hash verification failure evidence; forensic investigation records                             | Indefinite  |
| ABP-003             | Confirmed or suspected credential fraud | Forged credential evidence; legitimate credential comparison; all authorizations issued under forged credential; dispensation records | Indefinite  |
| ABP-004             | Confirmed prescription replay           | Original authorization with lifecycle; all dispensation events; quantity tracking records; supersession chain                         | 7+ years  |
| ABP-005             | Confirmed diversion                     | Custody event chain with gap; quantity reconciliation; investigation records; any recovery evidence                                   | Indefinite  |
| ABP-006             | Confirmed safety evidence fabrication   | Fabricated artifact; source system audit log; SES records; affected dispensation events; clinical re-assessment records               | Indefinite  |
| ABP-007–<br>ABP-010 | Per severity assessment                 | Pattern-specific evidence per containment scope   | Per institutional retention policy; minimum 7 years |

### Replay Requirement Matrix:

| Pattern ID | Replay Scope   | Replay Purpose  | Minimum Replay Capability   |
|------------|--|---|---|
| ABP-001    | Full provenance chain for affected batch/lot                         | Determine where counterfeit entered the chain                   | Event-by-event provenance replay with integrity verification at each link |
| ABP-002    | Provenance manifest event sequence                                   | Identify forged events and determine scope of affected products | Hash-verified event replay with forensic comparison against backup copies |
| ABP-003    | All authorizations and dispensation events under affected credential | Identify all potentially unauthorized actions                   | Authorization lifecycle replay + dispensation gate result replay          |
| ABP-004    | Authorization lifecycle + all dispensation events                    | Determine total actual dispensation vs. authorized quantity     | Full quantity tracking replay across all dispensation points              |
| ABP-005    | Custody event chain for affected products                            | Determine where diversion occurred and scope of loss            | Custody event replay with gap identification and location analysis        |
| ABP-006    | SES at dispensation time + CDSS audit log                            | Determine whether fabricated evidence                           | Decision state replay (Section 7.3) with source version cross-            |

| Pattern ID | Replay Scope | Replay Purpose                | Minimum Replay Capability |
|------------|--------------|-------------------------------|---------------------------|
|            |              | influenced clinical decisions | verification              |

## U.7 Corrective Action and EP Delta Discipline

### Correction / EP Delta Matrix:

| Pattern ID | Corrective Action   | EP Delta Required   | Non-Destructive Preservation  |
|------------|---|---|---|
| ABP-001    | Counterfeit confirmed: revoke PAES; quarantine/destroy product; notify downstream                                 | Yes — PAES state → AUTH_FAILED; provenance → PROV_BROKEN                        | Original PAES and provenance preserved in PB                                  |
| ABP-002    | Remove forged events; reconstruct chain from verified evidence; generate corrected provenance manifest            | Yes — provenance manifest superseded by corrected version                       | Forged events preserved in PB; corrected manifest becomes current-reference   |
| ABP-003    | Revoke all authorizations under forged credential; generate revocation EP Deltas per authorization                | Yes — each affected authorization → RX_REVOKED                                  | Original authorizations preserved; revocation records document fraud basis    |
| ABP-004    | Reconcile actual dispensation quantity; block further dispensation; generate quantity correction                  | Yes — authorization quantity tracking corrected; excess dispensation documented | Replay evidence preserved; excess dispensation flagged for clinical follow-up |
| ABP-005    | Document confirmed diversion; adjust custody chain; generate loss record  | Yes — custody state → CUST_COMPROMISED for affected segment                     | Original custody evidence preserved; diversion documented                     |
| ABP-006    | Invalidate fabricated evidence; regenerate safety evidence from verified sources; re-assess affected dispensation | Yes — SES superseded with fresh evidence from verified source                   | Fabricated artifact preserved in PB; fresh SES becomes current-reference      |
| ABP-009    | Restore valid version from backup; re-verify dependent states   | Yes — EP Delta documenting restoration; integrity incident record               | Overwritten version and restored version both preserved                       |

## U.8 Override, Exception, and Governance Controls

### Override Governance Matrix:

| <b>Override Type</b>                                   | <b>Authority Required</b>                    | <b>Documentation</b>   | <b>Governance Review</b>                           | <b>Recurrence Limit</b>   |
|--|--|--|--|---|
| Dispensation gate override (single gate, non-safety)   | Qualified pharmacist + supervisor            | DS-05 equivalent justification; accountability insert        | Quarterly review of override volume                | ≥5 overrides/month at same point triggers governance review     |
| Dispensation gate override (safety gate)               | Senior clinician + pharmacy director         | Full clinical justification; Exceptional review posture      | Each instance reviewed within 5 business days      | ≥3 safety gate overrides/quarter triggers institutional review  |
| Hold release without full resolution                   | Governance body approval                     | Resolution-in-progress documentation; risk acceptance record | Governance approval documented                     | No recurrence limit; each case individually approved            |
| Tier 2 access extension beyond initial TTL             | Dual-control re-approval                     | Updated justification; renewed scope definition              | Each extension reviewed in PARP                    | ≥3 extensions for same investigation triggers governance review |
| Correction without standard approval chain (emergency) | Emergency authority per institutional policy | Post-hoc full documentation within 24 hours                  | Mandatory governance review within 5 business days | Each emergency correction individually reviewed                 |

## U.9 Reviewer / Examiner Access Abuse and Bounded Verification Controls

### Reviewer Access Abuse Matrix:

| <b>Abuse Type</b>  | <b>Detection Method</b>   | <b>Containment</b>   | <b>Governance Response</b>  |
|--|---|--|---|
| Scope violation — data accessed outside approved purpose code                                  | PARP scope verification; access log analysis                                      | Terminate access; revoke grant   | Institutional disciplinary process; access restriction                    |
| TTL violation — access continues beyond expiry   | Automated TTL enforcement (should prevent); manual detection if enforcement fails | Force session termination; log enforcement failure as system incident  | System control remediation; access governance review                      |
| Frequency anomaly — reviewer accesses same subject repeatedly without documented justification | Access frequency monitoring; threshold alerts                                     | Flag for governance review; no automatic termination                   | Governance assessment of access pattern; potential restriction            |
| Data exfiltration indicator — bulk download or export beyond review purpose                    | Export volume monitoring; anomaly detection                                       | Terminate access; hold exported data if possible; preserve access logs | Incident investigation; institutional and potentially regulatory response |

| Abuse Type   | Detection Method  | Containment                                 | Governance Response                           |
|--|---|---|---|
| Collusive access — reviewer and operator coordinate to bypass minimization | Post-hoc pattern analysis comparing operator actions and reviewer access timing | Suspend both parties' access; investigation | Governance investigation; dual accountability |

## U.10 Residual Risk Register

### Residual Risk Register:

| Risk ID | Residual Risk  | Mitigating Controls   | Residual Severity             | Monitoring   |
|---------|--|---|-------------------------------|--|
| RR-001  | Counterfeit products with perfect provenance forgery (if hash algorithm compromised) | Crypto-agility baseline (Baseline B); periodic algorithm assessment; multi-source corroboration | Low (with current algorithms) | Algorithm lifecycle monitoring per Baseline B                  |
| RR-002  | Insider with legitimate credentials and system access fabricating evidence           | Separation of duties; multi-party controls; audit trail review; behavioral anomaly detection    | Moderate                      | Periodic audit of evidence generation patterns                 |
| RR-003  | Coordinated multi-party collusion exceeding governance quorum requirements           | No-master-key posture; distributed governance; rotation of governance roles                     | Low                           | Governance composition review at recertification               |
| RR-004  | Reviewer access abuse not detected within TTL window                                 | TTL enforcement; PARP review; access frequency monitoring                                       | Moderate                      | PARP completion rate monitoring; access pattern analysis       |
| RR-005  | Cross-border evidence portability gaps exploited for regulatory arbitrage            | Equivalence assessment discipline; cross-domain reconciliation; jurisdiction-bounded review     | Moderate                      | Cross-border evidence quality assessment at portability events |

## U.11 Worked Adversarial Mini-Scenarios

### Worked Scenario Summary Table:

| Scenario  | Pattern           | Detection  | Containment   | Resolution  | Evidence Preserved                                     |
|---|-------------------|--|---|---|--|
| Distributor substitutes lower-cost product with matching labels into legitimate custody chain | ABP-001 + ABP-005 | CPO hash mismatch at pharmacy receipt verification             | Quarantine all units from shipment; hold on distributor's custody chain | Investigation confirms substitution; product destroyed; distributor suspended | PB with provenance, custody, and substitution evidence |
| Expired prescription photo-copied and re-presented at multiple pharmacies                     | ABP-004           | Quantity bound exceeded across pharmacies; authorization state | Block all dispensation under the authorization;                         | Quantity reconciled; excess dispensation                                      | Authorization lifecycle; dispensation records across   |

| Scenario   | Pattern | Detection   | Containment  | Resolution  | Evidence Preserved   |
|--|---------|---|--|---|--|
|  |         | = RX_EXPIRED  | recall evidence from pharmacies                                | documented; prescriber and pharmacies notified  | pharmacies; quantity tracking  |
| Hospital system administrator modifies stored safety evidence to suppress contraindication alert history | ABP-009 | Periodic hash verification detects content-address mismatch on SES artifact | Hold all dependent dispensation; recover valid SES from backup | Valid SES restored; investigation of administrator actions; institutional corrective action | Original, tampered, and restored versions all preserved; access logs |
| Examiner uses Tier 2 access for broad patient data extraction beyond investigation scope                 | ABP-008 | PARP review identifies artifacts accessed outside approved scope definition | Access terminated; exported data quarantined                   | Governance investigation; access restriction; potential regulatory reporting                | Access logs; PARP; scope violation documentation                     |

## U.12 Reader Action Map

### Reader Action Map:

| Reader Profile                                 | Start Here                                  | Key Tables   | Primary Actions  |
|--|---|--|--|
| Incident responder                             | U.3 (Detection), U.5 (Containment)          | Detection Trigger Matrix, Containment Logic Table        | Identify pattern; apply containment; initiate preservation                       |
| Investigator                                   | U.6 (Preservation/Replay), U.7 (Correction) | Preservation/Replay matrices; Correction/EP Delta matrix | Gather evidence; replay events; determine corrective action                      |
| Governance body                                | U.8 (Override), U.10 (Residual Risk)        | Override Governance Matrix; Residual Risk Register       | Review overrides; assess residual risk; approve corrective actions               |
| Examiner / auditor                             | U.11 (Worked Scenarios), U.9 (Access Abuse) | Worked Scenario Table; Reviewer Access Abuse Matrix      | Verify detection controls; assess containment adequacy; review access compliance |
| Operator (pharmacy, distributor, manufacturer) | U.1 (Taxonomy), U.2 (Patterns)              | Failure Taxonomy; Abuse Pattern Table                    | Recognize patterns; implement detection; prepare for containment                 |

# Appendix V — Canonical State, Version Supersession, and Authority-to-Release / Authority-to-Dispense Controls

## V.0 Purpose and Reader Orientation

This appendix defines how canonical state (the single authoritative current-reference version), supersession chains, authority-to-release, authority-to-dispense, authority-to-correct, rollback posture, and downstream propagation operate across all framework domains. It deepens the version lineage templates (Appendix L) with operational decision logic.

## V.1 Canonical State Taxonomy

**Canonical State Taxonomy Table:**

| Domain            | Canonical Object   | Canonical Determination Method   | Authoritative Source   |
|-------------------|--|--|--|
| Product identity  | CPO (current version)  | Most recent non-revoked version in version lineage   | Manufacturer or authoritative product registry                               |
| Provenance        | Provenance manifest (current version)                        | Most recent manifest incorporating all verified custody events                                   | Aggregated from custody event producers; assembled by provenance coordinator |
| Authorization     | Prescription / authorization (current in supersession chain) | Most recent non-revoked, non-superseded version in supersession chain                            | Issuing prescriber or governance body  |
| Issuer legitimacy | AES (current verification)                                   | Most recent verification within freshness window with revocation check CLEAR                     | Credentialing body via verification process                                  |
| Custody           | CES (current chain endpoint)                                 | Most recent custody event in hash-chained sequence   | Current custodian's custody event log  |
| Safety evidence   | SES (current set)  | Most recent set where all required evidence classes are current relative to source data versions | Clinical systems; formulary; decision-support systems                        |
| Dispensation      | DEP-H (immutable once generated)                             | No supersession; dispensation events are terminal — corrections create new records, not versions | Dispensing entity  |
| Claim             | CLM-EP (current lifecycle state)                             | Most recent lifecycle event in claim chain   | Benefit administrator  |

## V.2 Authority-to-Release / Authority-to-Dispense Model

**Authority-to-Release / Authority-to-Dispense Matrix:**

| Action                          | Required Authority   | Evidence of Authority  | Freshness Requirement                     | Failure Response                                     |
|---------------------------------|--|--|---|--|
| Release product from quarantine | Quality function + governance approval                                       | Resolution evidence; quality assessment; governance approval record  | Event-driven (at release decision)        | Release blocked if approval incomplete               |
| Release hold-only containment   | Authority that imposed hold, or governance body                              | Resolution evidence; approval chain per Appendix F hold-set template | Event-driven                              | Hold continues until authorized release              |
| Dispense product to recipient   | Dispensing entity with valid dispensation credential; all G1–G7 gates passed | DEP-H with complete gate results; dispensing entity AES              | Gates verified at dispensation time       | Dispensation blocked at failing gate                 |
| Authorize prescription          | Licensed prescriber with ISSU_CONFIRMED; scope covers product                | AES with all bound categories verified                               | Issuer credential within freshness window | Authorization not valid; cannot support dispensation |
| Correct evidence artifact       | Originating entity + supervisor (routine); governance body (material)        | Correction EP Delta with approval chain                              | At correction time                        | Correction blocked without required approvals        |
| Revoke authorization            | Issuing authority, credentialing body, or governance body                    | Revocation record per Appendix L template                            | Immediate effect                          | Downstream propagation initiated                     |
| Approve claim for payout        | Benefit administrator; all CG gates passed                                   | CLM-EP with complete gate results and temporal assessment            | At adjudication time                      | Claim pended or denied                               |

### V.3 Canonical Determination Logic

Canonical Determination Logic Table:

| Condition                                    | Determination Rule                               | Example   |
|--|--|---|
| Single version exists, not revoked           | That version is canonical                        | Newly issued prescription — only version                                    |
| Multiple versions; clear supersession chain  | Latest non-revoked version in chain is canonical | Prescription renewed twice — v3 is canonical                                |
| Latest version revoked; prior versions exist | Canonical = null; re-authorization required      | Prescription v3 revoked; v1 and v2 are SUPERSEDED, not eligible as fallback |

| Condition  | Determination Rule  | Example  |
|--|---|--|
| Parallel versions (no supersession relationship) | Conflict detected; hold-only containment on all; governance resolution required | Two prescriptions from different prescribers for same product/patient without supersession linkage |
| Version under correction (EP Delta pending)      | Prior version remains canonical until correction finalized and approved         | CPO v2 correction in progress; v1 still governs until v2 approved                                  |
| All versions expired                             | Canonical = null (EXPIRED); new authorization required                          | Prescription with all versions past validity_end   |

## V.4 Version Supersession Discipline

### Supersession Chain Matrix:

| Rule                        | Requirement  | Violation Response   |
|-----------------------------|--|--|
| Ordered chain               | Each version links to its predecessor through content-addressed reference        | Chain break → BRK-INTEG; hold-only on affected states              |
| Single current              | Exactly one version with status CURRENT at any time (or zero if revoked/expired) | Multiple CURRENT → conflict resolution per V.7                     |
| Non-destructive             | Superseded versions preserved; accessible for replay                             | Destruction of superseded version → governance violation (LT-07)   |
| EP Delta at each transition | Every version change produces EP Delta   | Missing EP Delta → BRK-INTEG-005; correction required              |
| Temporal consistency        | Each version effective_from ≥ predecessor effective_until                        | Temporal overlap → investigation of backdating                     |
| Downstream propagation      | Actions bound to superseded version generate reconciliation break                | Dispensation referencing superseded authorization → BRK-AUTH break |

## V.5 Product, Authorization, Custody, and Canonical-State Relationships

### State Relationship Table:

| Upstream Canonical State               | Downstream Dependent States   | Binding Requirement   |
|--|---|---|
| CPO (canonical product identity)       | PAES, provenance manifest, CES events, SES product-level classes    | All downstream artifacts reference CPO content_address; CPO change propagates as material change trigger      |
| AES (canonical issuer legitimacy)      | Prescription validity, dispensation authorization, delegation chain | Dispensation gates reference current AES; AES revocation propagates to dependent authorizations               |
| Prescription (canonical authorization) | Dispensation events, claim linkage, refill tracking                 | Dispensation binds to current-reference prescription; superseded prescription cannot support new dispensation |
| SES (canonical safety evidence)        | Dispensation safety gate, decision state records                    | Dispensation gate G5 references current SES; superseded SES cannot satisfy gate without refresh               |
| CES (canonical                         | Dispensation custody gate,  | Dispensation gate G4 references current CES   |

| <b>Upstream Canonical State</b> | <b>Downstream Dependent States</b> | <b>Binding Requirement</b>                 |
|---------------------------------|------------------------------------|--|
| custody chain)                  | provenance alignment               | endpoint; custody break holds dispensation |

## V.6 Downstream Binding to Canonical State

### Downstream Binding Matrix:

| <b>Downstream Action</b> | <b>Must Bind To</b>   | <b>Verification At</b>                                  | <b>Stale Binding Response</b>  |
|--------------------------|---|---|--|
| Dispensation             | Current CPO, current AES, current CES endpoint, current SES                   | Each dispensation event (gates G1–G7)                   | BRK break per domain; dispensation blocked   |
| Claim submission         | DEP-H (immutable) → which references PAES, AES, CES, SES at dispensation time | Claim validation (gates CG-1–CG-6); temporal assessment | Gate failure; claim pended   |
| Refill                   | Current prescription version in supersession chain; current AES               | Each refill event                                       | Stale binding generates BRK-AUTH; refill blocked                                       |
| Recall scope             | Canonical CPO batch/lot reference   | Recall initiation                                       | Incorrect CPO reference → scope error; correction per recall scope EP Delta            |
| Offboarding snapshot     | All canonical states at snapshot time   | Final state snapshot generation                         | Snapshot references non-current version → reconciliation break in final reconciliation |

## V.7 Conflict and Parallel-State Resolution

### Conflict Resolution Matrix:

| <b>Conflict Type</b>                     | <b>Detection</b>  | <b>Default Response</b>                           | <b>Resolution Authority</b>                                     | <b>Evidence</b>  |
|--|---|---|---|--|
| Parallel prescriptions (no supersession) | Reconciliation detects multiple RX_VALID for same scope       | Hold-only on all affected prescriptions           | Institutional governance (Pharmacy and Therapeutics equivalent) | Determination record specifying which becomes canonical; others SUPERSEDED |
| Conflicting custody claims               | Two entities claim current custody of same product unit       | Hold-only on product; no transfer or dispensation | Investigation with both parties; governance determination       | Custody evidence from both parties; determination with supporting evidence |
| Divergent safety assessments             | Two evidence classes produce contradictory safety conclusions | SAFE_DISPUTED state; hold on dispensation         | Clinical review authority                                       | Clinical determination record; resolution EP Delta                         |

| <b>Conflict Type</b>   | <b>Detection</b>                           | <b>Default Response</b>            | <b>Resolution Authority</b>                     | <b>Evidence</b>   |
|--|--|------------------------------------|---|---|
| Version lineage fork (two corrections applied independently) | Hash chain verification shows branch point | Hold-only; both branches preserved | Governance body determines authoritative branch | Investigation of fork cause; single branch designated canonical; other archived |

## V.8 Evidence, Manifest, and Preservation Requirements for State Changes

### State-Change Artifact Requirement Matrix:

| <b>State Change Type</b>   | <b>Required Artifacts</b>  | <b>Content-Addressed</b> | <b>Linked To</b>                                   | <b>Retention</b>       |
|----------------------------|--|--------------------------|--|------------------------|
| Version creation (genesis) | Initial record + manifest entry                                  | Yes                      | Lineage record (Appendix L)                        | Per domain retention   |
| Supersession               | EP Delta (prior → new); supersession chain update                | Yes                      | Preceding version; succeeding version              | Both versions retained |
| Correction                 | Correction EP Delta; approval chain; prior/new content addresses | Yes                      | Version lineage; break record (if break-triggered) | Both versions retained |
| Revocation                 | Revocation record (Appendix L); downstream impact assessment     | Yes                      | All dependent downstream states                    | Indefinite             |
| Reclassification           | Reclassification EP Delta; governance approval                   | Yes                      | Prior classification; new classification           | Both retained          |
| Expiry                     | Expiry detection record  | Yes                      | Version lineage; temporal bound fields             | Per domain retention   |
| Hold entry / release       | Hold-set record (Appendix F)                                     | Yes                      | Triggering condition; resolution evidence          | Per domain retention   |

## V.9 Correction, Reclassification, Revocation, and Replay

### Correction / Revocation / Reclassification Matrix:

| <b>Action</b>      | <b>Authority</b>                | <b>EP Delta Required</b> | <b>Downstream Propagation</b>  | <b>Replay Capability</b>                        |
|--------------------|---------------------------------|--------------------------|--|---|
| Factual correction | Originating entity + supervisor | Yes                      | Identify and re-verify all downstream actions referencing pre-correction version | Pre- and post-correction states both replayable |

| Action   | Authority                             | EP Delta Required          | Downstream Propagation   | Replay Capability  |
|--|---------------------------------------|----------------------------|--|--|
| Reclassification (e.g., product category change) | Governance body                       | Yes                        | Material change trigger; downstream re-assessment required                       | Historical classification preserved; reclassification context replayable |
| Revocation (authorization)                       | Issuing authority or governance       | Yes                        | All dependent dispensation and claims assessed; holds applied to pending actions | Full authorization lifecycle replayable; revocation context preserved    |
| Revocation (credential)                          | Credentialing body                    | Yes                        | All authorizations under credential assessed; BRK-AUTH-004 workflow              | Credential lifecycle + all dependent authorization lifecycles replayable |
| Rollback (system-level)                          | Governance body + technical authority | Yes (documenting rollback) | All states restored to pre-change condition; post-rollback verification          | Pre-change, post-change, and rollback states all preserved               |

## V.10 Governance, Override, and Exception Controls

### Override and Exception Governance Matrix:

| Override / Exception  | Required Authorization                          | Documentation   | Review Cadence                       |
|---|---|---|--------------------------------------|
| Accept non-canonical state for dispensation (emergency)     | Senior clinician + governance                   | Emergency justification; Exceptional review posture   | Each instance within 5 business days |
| Override conflict resolution determination                  | Governance body (Steering Committee equivalent) | Documented rationale; dissenting positions recorded   | At determination time                |
| Extend hold beyond maximum duration                         | Governance body                                 | Updated justification; continued necessity assessment | At each extension                    |
| Accept correction without full investigation (low-severity) | Operational management (dual approval)          | Abbreviated investigation summary                     | Quarterly aggregate review           |

## V.11 Reviewer / Examiner Determination Paths

### Reviewer / Examiner Determination Matrix:

| Examiner Question                                     | Evidence Path                                       | Tier   |
|---|---|--------|
| "What is the canonical state of product X right now?" | CPO version lineage → current-reference hash → PAES | Tier 1 |
| "Was this dispensation bound to the                   | DEP-H → authorization reference → supersession      | Tier 1 |

| Examiner Question   | Evidence Path  | Tier   |
|---|--|--------|
| correct canonical authorization?"                           | chain → current-reference at dispensation time                             |        |
| "Were there any parallel-state conflicts for this product?" | Reconciliation break records → BRK-AUTH-006 or conflict resolution records | Tier 1 |
| "Show the full version lineage for this prescription"       | Version lineage record → EP Delta chain → all versions                     | Tier 1 |
| "Was the authority-to-dispense properly established?"       | DEP-H gate results → AES → issuer credential → scope verification          | Tier 1 |

## V.12 Offboarding and Legacy State Portability

### Offboarding State Portability Matrix:

| State Element                     | Portable to Legacy  | Data Loss Risk                  | Mitigation  |
|-----------------------------------|---|---------------------------------|---|
| Current-reference state values    | Yes — exportable as structured data                       | Low                             | Standard field mapping  |
| Supersession chain (full history) | Partial — legacy may not support chain structure          | Moderate                        | Archive full chain in framework storage; export current-reference only to legacy; document chain availability |
| EP Delta chain                    | Partial — legacy may not support delta chaining           | Moderate                        | Archive deltas; export summary corrections to legacy  |
| Content addresses / hash linkage  | Rarely — legacy systems typically lack content addressing | High for integrity verification | Archive content-addressed originals; export plain-text equivalents with integrity attestation                 |
| Revocation records                | Yes — exportable as event records                         | Low                             | Standard event mapping  |

## V.13 Worked Mini-Scenarios

### Worked Scenario Summary Table:

| Scenario  | Domain                | Canonical Issue                                       | Resolution  |
|---|-----------------------|---|---|
| Two pharmacies hold different prescription versions for same patient/product; neither shows supersession linkage  | Authorization         | Parallel-state conflict                               | Governance resolution: prescriber confirms intended current prescription; other SUPERSEDED; EP Delta chain repaired           |
| Hospital formulary change supersedes safety evidence for 200 active prescriptions; 15 dispensation events pending | Safety / dispensation | Mass supersession triggering cascade of gate failures | Batch SES refresh against new formulary; 12 of 15 dispensation events clear after refresh; 3 require prescriber re-assessment |
| Product CPO corrected (wrong batch/lot reference); 50 downstream PAES   | Product identity      | Correction propagation across large artifact          | Correction EP Delta for CPO; batch re-linkage of 50 PAES artifacts; reconciliation confirms                                   |

| <b>Scenario</b>             | <b>Domain</b> | <b>Canonical Issue</b> | <b>Resolution</b> |
|-----------------------------|---------------|------------------------|-------------------|
| artifacts reference old CPO |               | population             | all 50 updated    |

### V.14 Reader Action Map

| <b>Reader Profile</b>           | <b>Start Here</b> | <b>Key Tables</b>                              | <b>Primary Actions</b>   |
|---------------------------------|-------------------|--|--|
| Dispensation system implementer | V.2, V.6          | Authority Matrix;<br>Downstream Binding Matrix | Configure gate logic to reference canonical states             |
| Governance body                 | V.7, V.10         | Conflict Resolution Matrix;<br>Override Matrix | Adjudicate conflicts; approve exceptions                       |
| Examiner                        | V.11, V.3         | Determination Matrix;<br>Canonical Logic Table | Verify canonical state determination; audit version lineage    |
| Offboarding coordinator         | V.12              | Portability Matrix                             | Plan legacy transition for version history and canonical state |

# Appendix W — Claim, Reimbursement, Settlement, and Dispute-Resilient Payout Controls

## W.0 Purpose and Reader Orientation

This appendix deepens Section 12 and Appendix P with a complete operational model for financially consequential healthcare workflows. It is conditional — included only where claim, reimbursement, settlement, or payout workflows are in scope. It does not dominate the framework; every financial control links back to product authenticity, authorization, custody, and proof-of-safety sufficiency.

## W.1 Revenue / Claim Event Taxonomy

### Claim / Event Taxonomy Table:

| Event Category               | Event Codes   | Description   | Evidence Linkage   |
|------------------------------|---|---|--|
| Dispensation-triggered claim | CLM_SUBMITTED through CLM_PAID (per Section 12.1)                     | Standard reimbursement claim for a dispensation event                                       | DEP-H → PAES, AES, CES, SES  |
| Service-triggered claim      | SVC_SUBMITTED, SVC_VALIDATED, SVC_ADJUDICATED, SVC_APPROVED, SVC_PAID | Claim for clinical service (administration, counseling, assessment) linked to product event | Service record → authorization → product reference (if applicable) |
| Adjustment event             | CLM_ADJUSTED, CLM_REVERSED (per Section 12.6)                         | Post-payment correction linked to upstream evidence change                                  | Adjustment linkage template (Appendix P, P.3)                      |
| Dispute event                | DSP_INITIATED, DSP_EVIDENCE_SUBMITTED, DSP_DETERMINED, DSP_CLOSED     | Claim disputed by any party; evidence-based resolution                                      | Dispute record → original claim → all linked evidence              |
| Recovery event               | REC_INITIATED, REC_IN_PROGRESS, REC_COMPLETED, REC_WRITTEN_OFF        | Recovery of overpayment or fraudulent payment   | Recovery record → adjustment → original claim                      |

## W.2 Eligibility and Contribution / Entitlement Logic

### Eligibility and Contribution Matrix:

| Eligibility Dimension       | Verification Source             | Verification Timing                 | Failure Response                |
|-----------------------------|---------------------------------|-------------------------------------|---------------------------------|
| Beneficiary coverage active | Benefit plan enrollment records | At claim submission (CG validation) | Claim denied: coverage inactive |

| <b>Eligibility Dimension</b>             | <b>Verification Source</b>     | <b>Verification Timing</b> | <b>Failure Response</b>                          |
|--|--------------------------------|----------------------------|--|
| Product covered under plan               | Formulary / benefit schedule   | At claim submission        | Claim denied or pending for exception review     |
| Authorization valid at dispensation time | AES temporal assessment        | At claim validation (CG-2) | Claim pending or denied per temporal assessment  |
| Provider/pharmacy authorized for plan    | Provider credentialing records | At claim submission        | Claim denied: provider not credentialed for plan |
| Quantity within benefit limits           | Benefit accumulation tracking  | At claim submission        | Claim denied or pending for quantity exception   |

### W.3 Eligibility Gates for Calculation and Payout

#### Eligibility Gate Matrix:

| <b>Gate</b>                          | <b>Verification</b>  | <b>Source</b>                               | <b>Failure</b>                              |
|--------------------------------------|--|---|---|
| EG-1: Coverage verification          | Beneficiary enrolled and coverage active at dispensation date              | Enrollment records                          | Claim denied                                |
| EG-2: Product formulary status       | Product on approved formulary (or exception approved) at dispensation date | Formulary records (version at dispensation) | Claim pending for exception review          |
| EG-3: Authorization evidence linkage | All CG gates (CG-1 through CG-6 from Section 12.2) passed                  | CLM-EP gate results                         | Claim pending or denied per CG failure type |
| EG-4: Provider credentialing         | Dispensing entity credentialed with benefit plan                           | Provider records                            | Claim denied                                |
| EG-5: Benefit accumulation           | Dispensation within benefit period limits (quantity, cost, visit count)    | Accumulation tracking                       | Claim denied or pending                     |
| EG-6: Pricing verification           | Claimed amount consistent with contracted pricing                          | Pricing schedules                           | Claim adjusted to contracted amount         |

### W.4 Claim / Reimbursement Waterfall Model

#### Claim / Reimbursement Waterfall Table:

| <b>Step</b>   | <b>Action</b>                        | <b>Input</b>   | <b>Output</b>                                    | <b>Evidence</b>                          |
|---------------|--------------------------------------|--|--|--|
| 1. Submission | Claim submitted by provider/pharmacy | Dispensation reference, product reference, authorization reference, amount | CLM_SUBMITTED event                              | Claim record with all linkage references |
| 2. Validation | CG and EG gates evaluated            | Claim record + upstream evidence sets                                      | CLM_VALIDATED (if all pass) or CLM_PENDED        | Gate results record                      |
| 3. Pricing    | Amount calculated per contracted     | Contracted pricing schedule + dispensation                                 | Priced amount (may differ from submitted amount) | Pricing calculation record               |

| Step              | Action                                     | Input   | Output                       | Evidence   |
|-------------------|--|---|------------------------------|--|
|                   | pricing                                    | parameters                                    |                              |  |
| 4. Adjudication   | Determination issued (approve, deny, pend) | Validated and priced claim + all gate results | CLM_ADJUDICATED              | Adjudication record with determination and reason      |
| 5. Approval       | Approved for payout                        | Adjudication = approved                       | CLM_APPROVED                 | Approval record with evidence sufficiency confirmation |
| 6. Payout         | Payment executed                           | Approval + payment instruction                | CLM_PAID                     | Settlement confirmation                                |
| 7. Reconciliation | Claim evidence reconciled periodically     | Claim records + upstream evidence             | Alignment or break detection | Reconciliation report                                  |

## W.5 Usage, Event, and Calculation Artifacts

### Usage / Event and Calculation Artifact Matrix:

| Artifact                   | Content  | Content-Addressed | Linked To                                 | Retention |
|----------------------------|--|-------------------|---|-----------|
| Claim submission record    | All claim fields, linkage references, submission timestamp                       | Yes               | DEP-H; AES; PAES                          | 7+ years  |
| Gate result record         | CG-1 through CG-6 and EG-1 through EG-6 results                                  | Yes               | Claim record; upstream evidence manifests | 7+ years  |
| Pricing calculation record | Submitted amount, contracted rate, calculated amount, adjustment reason (if any) | Yes               | Pricing schedule version; claim record    | 7+ years  |
| Adjudication record        | Determination, reason code, reviewed evidence references, adjudicator identifier | Yes               | Claim record; gate results                | 7+ years  |
| Settlement confirmation    | Payment reference, amount, execution timestamp, settlement status                | Yes               | Approval record; payment system           | 7+ years  |

## W.6 Settlement Confirmation and Payout Linkage

### Settlement Confirmation and Payout Linkage Matrix:

| Settlement Element             | Verification  | Evidence                       | Failure Response                                |
|--------------------------------|---|--------------------------------|---|
| Payout amount matches approved | Amount comparison:<br>CLM_APPROVED.amount = CLM_PAID.amount | Settlement confirmation record | BRK-CLAIM-005 if mismatch; adjustment initiated |

| Settlement Element                   | Verification   | Evidence                  | Failure Response                                      |
|--------------------------------------|--|---------------------------|---|
| amount                               |  |                           |   |
| Payee matches approved payee         | Payee identifier comparison  | Payee verification record | Payout blocked; investigation                         |
| Settlement timing within SLA         | Timestamp comparison:<br>CLM_PAID.timestamp - CLM_APPROVED.timestamp ≤ SLA | Timing record             | SLA breach logged; governance notification            |
| No duplicate payout                  | Uniqueness check: single CLM_PAID per CLM_APPROVED                         | Duplicate detection query | BRK-CLAIM-004; immediate investigation                |
| Evidence chain intact at payout time | Spot-check: upstream evidence still valid (no post-approval revocation)    | Re-verification record    | Payout held if post-approval evidence change detected |

## W.7 Break Taxonomy for Claim and Payout Workflows

### Financial Break Taxonomy Table:

| Break Code  | Name   | Severity                             | Detection  | Response  |
|-------------|--|--------------------------------------|--|---|
| BRK-FIN-001 | Claim without valid dispensation evidence                                | SEV-2                                | CG-1 gate failure                                      | Claim pended                                    |
| BRK-FIN-002 | Authorization invalid at dispensation time (pre-dispensation revocation) | SEV-1                                | CG-2 temporal assessment                               | Claim denied; dispensation investigation        |
| BRK-FIN-003 | Duplicate claim for same dispensation                                    | SEV-2                                | CG-6 uniqueness check                                  | Both claims held; investigation                 |
| BRK-FIN-004 | Payout without approved claim  | SEV-1                                | Reconciliation: payment without CLM_APPROVED           | Immediate investigation; recovery               |
| BRK-FIN-005 | Payout amount mismatch   | SEV-3 (rounding) to SEV-2 (material) | Amount comparison                                      | Adjustment                                      |
| BRK-FIN-006 | Post-payment upstream evidence change                                    | SEV-2                                | Reconciliation detects revocation/recall post-CLM_PAID | Adjustment or reversal assessment               |
| BRK-FIN-007 | Claim aging beyond adjudication SLA                                      | SEV-3                                | Aging monitoring                                       | Governance notification; expedited adjudication |

## W.8 Hold-Only Containment and Dispute-Resilient Controls

### Hold-Only Containment Matrix:

| <b>Hold Trigger</b>                        | <b>Scope</b>                     | <b>Duration</b>                                 | <b>Release Condition</b>   |
|--|----------------------------------|---|--|
| Evidence gate failure (CG or EG)           | Individual claim                 | Until evidence gap resolved                     | Evidence refreshed; gate re-evaluated and passes                           |
| Upstream evidence revocation post-approval | Claim + payout                   | Until impact assessment complete                | Assessment determines: no impact (release) or adjustment/reversal required |
| Dispute initiated                          | Claimed amount                   | Until determination issued                      | Dispute resolved; determination executed                                   |
| Duplicate detection                        | Both claims                      | Until investigation determines legitimate claim | One claim confirmed; duplicate denied                                      |
| Fraud investigation                        | All claims from suspected source | Per investigation timeline                      | Investigation concluded; appropriate action taken                          |

## **W.9 Adjustment, Reversal, Rebinding, and EP Delta Discipline**

### **Adjustment / Reversal / Rebinding Matrix:**

| <b>Action</b>                 | <b>Trigger</b>   | <b>Authority</b>   | <b>EP Delta</b>   | <b>Recovery</b>  |
|-------------------------------|--|--|---|--|
| Pricing adjustment            | Pricing error detected post-payment                            | Benefit administrator (dual approval for material amounts) | Yes — CLM_ADJUSTED with amount delta                    | Overpayment: recovery initiated; underpayment: supplemental payment  |
| Authorization-based reversal  | Authorization revoked pre-dispensation discovered post-payment | Benefit administrator + governance                         | Yes — CLM_REVERSED with revocation reference            | Full recovery initiated  |
| Recall-based adjustment       | Product recalled post-dispensation and post-payment            | Benefit administrator                                      | Yes — CLM_ADJUSTED with recall reference                | Institutional determination: full/partial/no recovery                |
| Evidence correction rebinding | Upstream evidence corrected (not invalidated)                  | Benefit administrator                                      | Yes — claim evidence chain rebound to corrected version | No financial adjustment if correction does not change claim validity |
| Fraud determination reversal  | Fraud investigation confirms fraudulent claim                  | Benefit administrator + governance + regulatory liaison    | Yes — CLM_REVERSED with fraud reference                 | Full recovery; regulatory referral                                   |

## **W.10 Governance, Override, and Accountability for Payout Decisions**

### **Governance and Accountability Matrix:**

| <b>Decision</b>                           | <b>Authority</b>                            | <b>Accountability Insert Required</b>  | <b>Review</b>                                 |
|---|---|--|---|
| Approve claim for payout                  | Benefit administrator adjudication function | Yes (standard)                         | Quarterly sample audit                        |
| Override gate failure for claim approval  | Senior adjudicator + supervisor             | Yes (enhanced — full justification)    | Each override reviewed within 5 business days |
| Approve adjustment / reversal             | Benefit administrator (dual approval)       | Yes                                    | Monthly aggregate review                      |
| Approve write-off of unrecoverable amount | Governance body                             | Yes (with financial impact assessment) | Each write-off individually approved          |
| Approve payout hold release               | Adjudication authority                      | Yes                                    | Standard review cadence                       |

## W.11 Reviewer / Examiner Verification Paths

### Reviewer / Examiner Verification Matrix:

| <b>Examiner Question</b>                           | <b>Evidence Path</b>                                 | <b>Tier</b>                             |
|--|--|---|
| "Were all claim gates properly evaluated?"         | CLM-EP → gate results → upstream evidence references | Tier 1                                  |
| "Was the temporal assessment correctly applied?"   | CLM-EP → temporal assessment record → AES timeline   | Tier 1                                  |
| "Show post-payment adjustments and their triggers" | Adjustment records → upstream trigger references     | Tier 1                                  |
| "Are there unresolved financial breaks?"           | Open breaks register (claims)                        | Tier 0 (aggregate); Tier 1 (individual) |
| "What is the recovery status for reversed claims?" | Recovery tracking records                            | Tier 1                                  |

## W.12 Residual Balances, Unmatched Amounts, and Exception Queues

### Residual Balance and Exception Queue Matrix:

| <b>Exception Type</b>                     | <b>Detection</b> | <b>Aging Threshold</b> | <b>Escalation</b>            | <b>Disposition</b>                     |
|---|------------------|------------------------|------------------------------|--|
| Claim validated but not adjudicated       | Aging monitor    | >10 business days      | Governance notification      | Expedited adjudication                 |
| Approved but not paid                     | Aging monitor    | >5 business days       | Payment system investigation | Resolve payment issue or cancel        |
| Recovery initiated but not completed      | Aging monitor    | >90 days               | Governance review            | Continue recovery or approve write-off |
| Unmatched payment (payment without claim) | Reconciliation   | Any occurrence         | Immediate investigation      | Identify claim or recover payment      |
| Disputed amount in hold                   | Dispute aging    | >30 days               | Governance review            | Expedite determination                 |

## W.13 Offboarding and Financial-State Portability

### Offboarding Financial-State Portability Matrix:

| Financial Element                     | Portable                 | Legacy Requirement                        | Data Loss Risk                                |
|---------------------------------------|--------------------------|---|---|
| Claim lifecycle records               | Yes                      | Claims database or archive                | Low   |
| Gate results and temporal assessments | Partial                  | May not support temporal assessment logic | Moderate — archive originals                  |
| Adjustment/reversal chain             | Yes — as event records   | Claims adjustment history                 | Low   |
| Open breaks register                  | Yes — as structured data | Exception tracking system                 | Low   |
| Evidence linkage (content-addressed)  | Partial                  | Typically lacks content addressing        | Moderate — archive with integrity attestation |
| Recovery tracking                     | Yes                      | Accounts receivable or recovery system    | Low   |

## W.14 Worked Mini-Scenarios

### Worked Scenario Summary Table:

| Scenario   | Trigger                                       | Key Control  | Outcome   |
|--|---|--|---|
| Claim submitted for recalled product; recall occurred between dispensation and claim                   | CG-5 detects active recall at submission      | Claim pended; investigation determines product was not from recalled batch | Claim released; pended batch/lot assessment documented  |
| Post-payment discovery: prescriber credential revoked 2 days before dispensation                       | BRK-FIN-002 via reconciliation                | CLM_REVERSED; full recovery initiated; patient safety assessment           | Recovery completed; patient care continuity confirmed   |
| Duplicate claim from two pharmacies for same dispensation (patient obtained two fills inappropriately) | CG-6 detects duplicate dispensation reference | Both claims held; investigation reveals quantity bound exceeded            | One claim approved (legitimate fill); second denied; prescription quantity tracking corrected |

## W.15 Reader Action Map

| Reader Profile        | Start Here | Key Tables                                    | Primary Actions  |
|-----------------------|------------|---|--|
| Benefit administrator | W.3–W.4    | Gate Matrix; Waterfall Table                  | Configure eligibility gates; implement adjudication workflow |
| Claims auditor        | W.7, W.11  | Financial Break Taxonomy; Verification Matrix | Audit gate compliance; verify temporal assessments           |
| Governance            | W.10, W.12 | Accountability Matrix; Exception Queue Matrix | Approve overrides; review aging exceptions                   |
| Offboarding           | W.13       | Financial Portability Matrix                  | Plan claim data transition                                   |

| <b>Reader Profile</b> | <b>Start Here</b> | <b>Key Tables</b> | <b>Primary Actions</b> |
|-----------------------|-------------------|-------------------|------------------------|
| coordinator           |                   |                   |                        |

# Appendix X — Bounded Reviewer/Examiner Verification Outputs, Minimal Disclosure Profiles, and Query-Safe Evidence Views

## X.0 Purpose and Reader Orientation

This appendix operationalizes bounded verification — the discipline ensuring reviewers receive exactly the evidence needed for their documented purpose, at the appropriate disclosure level, within TTL constraints, with post-access accountability. It deepens Section 10 and Appendix Q with comprehensive profiles, query-safe views, and over-disclosure prevention controls.

## X.1 Verification Output Taxonomy

Verification Output Taxonomy Table:

| Output Type                  | Code       | Disclosure Level                                 | Content   | Tier             |
|------------------------------|------------|--|---|------------------|
| Aggregate statistical report | OUT-AGG    | Anonymized aggregate only                        | Pass rates, counts, distributions, trends         | Tier 0           |
| VOP (proof-based)            | OUT-VOP    | Bounded claim only                               | PASS/FAIL + freshness + revocation status         | Tier 0 / Tier 1  |
| Minimized disclosure extract | OUT-MIN    | Pseudonymized, scoped                            | State values, evidence class presence, key dates  | Tier 1           |
| Scoped evidence extract      | OUT-SCOPED | Pseudonymized, full artifact detail within scope | Complete evidence artifacts for specified subject | Tier 1           |
| Full identity extract        | OUT-FULL   | De-pseudonymized within approved scope           | Underlying identity, raw evidence, full detail    | Tier 2           |
| Replay reconstruction        | OUT-REPLAY | Per replay tier                                  | Complete state reconstruction at historical point | Tier 1 or Tier 2 |

## X.2 Reviewer and Examiner Profile Taxonomy

Reviewer Profile Matrix:

| Profile                      | Typical Purpose Codes | Default Tier    | Upgrade Path                                     |
|------------------------------|-----------------------|-----------------|--|
| Routine operational auditor  | PUR-EXAM-ROUTINE      | Tier 0 → Tier 1 | Documented finding triggers Tier 1 request       |
| Break investigator           | PUR-RECON-BREAK       | Tier 1          | Break severity SEV-1 may justify Tier 2          |
| Safety incident investigator | PUR-SAFETY-INCIDENT   | Tier 1 → Tier 2 | Patient notification requirement triggers Tier 2 |
| Recall scope coordinator     | PUR-RECALL-SCOPE      | Tier 1          | Full custody identification may require Tier 2   |
| Dispute resolution           | PUR-DISPUTE           | Tier 1          | Identity of disputing parties                    |

| Profile                               | Typical Purpose Codes | Default Tier    | Upgrade Path   |
|---------------------------------------|-----------------------|-----------------|--|
| authority                             |                       |                 | may require Tier 2                                   |
| Regulatory enforcement investigator   | PUR-ENFORCEMENT       | Tier 1 → Tier 2 | Enforcement action requires Tier 2 with dual-control |
| Governance reviewer (recertification) | PUR-EXAM-ROUTINE      | Tier 0 → Tier 1 | Deficiency finding triggers Tier 1                   |

### X.3 Minimal Disclosure Profiles

#### Minimal Disclosure Profile Matrix:

| Evidence Domain  | Tier 0 Disclosure                                     | Tier 1 Disclosure   | Tier 2 Disclosure   |
|------------------|---|---|---|
| Product identity | Product category counts; authenticity pass rates      | CPO reference, batch/lot, authenticity state, provenance status           | Full manufacturer identity, commercial terms              |
| Authorization    | Authorization validity rates; override frequency      | Authorization type, validity state, scope summary, issuer pseudonym       | Prescriber identity, license details, practice address    |
| Custody          | Custody integrity rates; excursion frequencies        | Chain status, event count, last event type/timestamp, custodian pseudonym | Custodian identity, facility details, transport specifics |
| Safety           | Safety evidence coverage rates; override counts       | Safety state, evidence class presence/absence, freshness, override flag   | Patient parameters, clinical notes, raw decision inputs   |
| Claims           | Gate pass rates; adjustment rates; aging distribution | Claim status, gate results, amount category, temporal assessment          | Patient identity, benefit plan specifics, pricing details |
| Reviewer access  | Access volume by tier and purpose                     | Individual access event metadata (pseudonymized reviewer)                 | Reviewer identity, full accessed artifact list            |

### X.4 Query-Safe Evidence Views

#### Query-Safe Evidence View Table:

| View Name                    | Content   | Excluded  | Use Case                         |
|------------------------------|---|---|----------------------------------|
| Product-Posture-View         | Authenticity state, provenance status, recall status, last verification timestamp                 | Manufacturer commercial terms, pricing, supply chain partner identities | Routine product integrity review |
| Authorization-Lifecycle-View | Authorization type, validity state, issuer legitimacy state, bound summary, supersession position | Prescriber name, patient identity, clinical indication details          | Authorization compliance audit   |
| Custody-Chain-Summary-View   | Chain status, event   | Custodian   | Custody integrity                |

| View Name              | Content  | Excluded  | Use Case                             |
|------------------------|--|---|--------------------------------------|
|                        | count, last event, gap count, excursion count  | commercial identity, facility address, transport routing                          | assessment                           |
| Safety-Coverage-View   | Safety state, evidence class inventory (present/absent/stale), override flag, review posture | Patient parameters, clinical notes, raw algorithm inputs                          | Safety evidence completeness review  |
| Dispensation-Gate-View | Gate results (G1–G7 PASS/FAIL), review posture, dispensation timestamp                       | Patient identity, full prescription details, clinical rationale (unless override) | Dispensation compliance verification |
| Claim-Status-View      | Claim status, gate results (CG/EG), temporal assessment, amount category                     | Patient identity, benefit plan details, specific pricing                          | Claim adjudication audit             |

## X.5 Sufficiency Standards for Review Purposes

### Sufficiency Standard Matrix:

| Review Purpose                | Minimum Output Type  | Minimum Tier                           | Sufficient When  |
|-------------------------------|--|--|--|
| Routine compliance audit      | OUT-AGG + selected OUT-MIN                                 | Tier 0 + Tier 1                        | Aggregate statistics within acceptable ranges; no material findings in sample          |
| Break investigation           | OUT-SCOPED for break-affected entities                     | Tier 1                                 | Root cause identified; corrective action documented; break resolved                    |
| Safety incident investigation | OUT-SCOPED + potentially OUT-FULL for patient notification | Tier 1 + Tier 2 (if patient ID needed) | Clinical assessment complete; patient safety confirmed; corrective action documented   |
| Recall scope determination    | OUT-SCOPED for affected products and custody holders       | Tier 1                                 | All affected units identified; all custody holders notified                            |
| Recertification assessment    | OUT-AGG + sampled OUT-MIN                                  | Tier 0 + Tier 1                        | All recertification criteria evaluated; deficiencies documented with remediation plans |

## X.6 Purpose Limitation, TTL, and Escalation Rules

### Purpose / TTL / Escalation Matrix:

| Purpose Code     | Default TTL | Renewal Process     | Escalation to Tier 2 Trigger                     |
|------------------|-------------|---------------------|--|
| PUR-EXAM-ROUTINE | 30 days     | Standard re-request | Material finding requiring identity verification |

| <b>Purpose Code</b> | <b>Default TTL</b>            | <b>Renewal Process</b>                     | <b>Escalation to Tier 2 Trigger</b>                        |
|---------------------|-------------------------------|--|--|
| PUR-RECON-BREAK     | 14 days                       | Updated justification required             | SEV-1 break with potential adversarial pattern             |
| PUR-SAFETY-INCIDENT | 30 days                       | Updated justification with clinical status | Patient notification requirement                           |
| PUR-RECALL-SCOPE    | Duration of recall lifecycle  | Automatic renewal while recall active      | Custody holder identification for unresponsive entities    |
| PUR-DISPUTE         | Duration of dispute lifecycle | Automatic renewal while dispute active     | Identity of parties needed for determination               |
| PUR-ENFORCEMENT     | Per regulatory authority      | Re-authorization with updated scope        | Standard Tier 2 controls (dual-control, objective trigger) |

## X.7 Reviewer-Safe Replay and Bounded Reconstruction

### Reviewer-Safe Replay Matrix:

| <b>Replay Type</b>             | <b>Disclosure Level</b> | <b>What Reviewer Sees</b>  | <b>What Reviewer Does Not See</b>                                   |
|--------------------------------|-------------------------|--|---|
| Product history replay         | Tier 1                  | CPO versions, provenance chain events (pseudonymized actors), custody transitions, state changes   | Manufacturer commercial arrangements, custodian identities, pricing |
| Authorization lifecycle replay | Tier 1                  | Authorization versions, EP Deltas, bound changes, supersession chain                               | Prescriber personal details, patient identity                       |
| Clinical decision replay       | Tier 1                  | Decision state record, evidence class presence, algorithm version, override flag and justification | Patient parameters, raw clinical data, full prescriber identity     |
| Claim lifecycle replay         | Tier 1                  | Claim events, gate results, temporal assessment, adjustment chain                                  | Patient identity, benefit plan terms, specific pricing              |

## X.8 Post-Access Review and Access-Governance Controls

### Post-Access Review Matrix:

| <b>Access Tier</b> | <b>PARP Required</b>              | <b>PARP Contents</b>   | <b>Review SLA</b>        | <b>Non-Compliance Response</b>                          |
|--------------------|-----------------------------------|--|--------------------------|---|
| Tier 0             | No (standard logging only)        | N/A  | N/A                      | N/A   |
| Tier 1 (routine)   | Optional per institutional policy | Scope verification, findings summary                             | Per institutional policy | Access pattern review                                   |
| Tier 1 (sensitive) | Yes                               | Scope verification, data handling confirmation, findings summary | 5 business days          | Compliance alert at 10 days                             |
| Tier 2             | Always                            | Full PARP per Section 10.6 (9 required fields)                   | 5 business days          | Governance notification at 7 days; compliance violation |

| Access Tier | PARP Required | PARP Contents | Review SLA | Non-Compliance Response |
|-------------|---------------|---------------|------------|-------------------------|
|             |               |               |            | at 10 days              |

## X.9 Verification Failures and Over-Disclosure Prevention

### Over-Disclosure Prevention Matrix:

| Risk  | Prevention Control  | Detection Method  | Response  |
|---|---|---|---|
| Tier 0 output contains identifiable data            | Automated anonymization check before output delivery                          | Pattern scan for identifiers, pseudonyms, or small-N aggregations | Output blocked; re-anonymized; incident logged                          |
| Tier 1 output contains de-pseudonymized identifiers | Pseudonymization verification at output generation                            | Identifier format check (real names, license numbers, addresses)  | Output blocked; identifiers re-pseudonymized                            |
| Tier 2 output scope exceeds approval                | Scope enforcement at retrieval: only approved artifact references retrievable | Artifact reference comparison against approval scope              | Excess artifacts excluded; scope violation logged                       |
| Bulk export exceeding reasonable review volume      | Export volume threshold monitoring  | Volume anomaly detection  | Export paused; reviewer contacted; governance notification if anomalous |
| Evidence retained by reviewer beyond TTL            | TTL enforcement at access layer   | Automated access revocation at TTL expiry                         | Access terminated; retention reminder sent                              |

## X.10 Minimal Proof-Based Verification Outputs (Optional)

### Minimal Proof-Based Output Table:

| Query                              | Traditional Output (Tier 1)         | Proof-Based Output (VOP)                       | Disclosure Reduction                              |
|------------------------------------|-------------------------------------|--|---|
| "Is product X authentic?"          | Full PAES with provenance detail    | VOP: PASS + freshness + revocation             | Eliminates provenance chain detail exposure       |
| "Is prescriber authorized?"        | Full AES with credential detail     | VOP: PASS + freshness + scope match            | Eliminates credential and practice detail         |
| "Is safety evidence sufficient?"   | Full SES with evidence class detail | VOP: PASS + evidence class count + freshness   | Eliminates clinical decision detail               |
| "Has custody chain been verified?" | Full CES with event chain           | VOP: PASS + event count + last event timestamp | Eliminates custodian identity and facility detail |

## X.11 Reviewer / Examiner Query Families

### Reviewer / Examiner Query Family Table:

| Family                           | Queries                              | Default Tier    | Output Type           |
|----------------------------------|--------------------------------------|-----------------|-----------------------|
| Product integrity queries        | EQP-001 through EQP-003 (Appendix E) | Tier 1          | OUT-SCOPED or OUT-VOP |
| Authorization compliance queries | EQP-004 through EQP-006              | Tier 1          | OUT-SCOPED            |
| Dispensation gate queries        | EQP-007 through EQP-008              | Tier 1          | OUT-SCOPED            |
| Safety evidence queries          | EQP-009 through EQP-011              | Tier 1          | OUT-SCOPED or OUT-VOP |
| Reconciliation queries           | EQP-012 through EQP-014              | Tier 0 / Tier 1 | OUT-AGG or OUT-SCOPED |
| Access compliance queries        | EQP-017 through EQP-018              | Tier 0 / Tier 1 | OUT-AGG or OUT-SCOPED |

## X.12 Offboarding, Portability, and Output Handoff Rules

### Offboarding Output Handoff Matrix:

| Output Type                   | Portable to Legacy                                   | Handoff Requirement                                   | Post-Handoff Access                            |
|-------------------------------|--|---|--|
| Aggregate reports (OUT-AGG)   | Yes  | Standard data transfer                                | Archived in legacy reporting system            |
| VOPs                          | Partial — legacy may not validate proofs             | Archive VOP artifacts with integrity attestation      | Retrieved from framework archive if needed     |
| Minimized disclosure extracts | Yes — structured data                                | Standard data transfer with minimization log          | Subject to legacy retention policy             |
| Full evidence extracts        | Per offboarding proof bundle procedures (Appendix I) | Content-addressed archive with integrity verification | Per archival retention schedule (Section 13.7) |

## X.13 Worked Mini-Scenarios

### Worked Scenario Summary Table:

| Scenario  | Review Type          | Tier Used       | Output Type   | Outcome  |
|---|----------------------|-----------------|---|--|
| Routine quarterly audit: product authenticity pass rates  | Compliance audit     | Tier 0          | OUT-AGG   | 99.7% pass rate; no material findings  |
| Break investigation: custody gap for controlled substance | Break investigation  | Tier 1          | OUT-SCOPED  | Gap caused by logistics system timeout; compensating evidence obtained; break resolved |
| Safety incident: contraindication override without        | Safety investigation | Tier 1 → Tier 2 | OUT-SCOPED → OUT-FULL (patient notification needed) | Override confirmed undocumented; clinical re-assessment confirms no harm;              |

| Scenario      | Review Type | Tier Used | Output Type | Outcome   |
|---------------|-------------|-----------|-------------|---|
| documentation |             |           |             | DS-05 retroactively documented; process improvement initiated |

## X.14 Reader Action Map

| Reader Profile               | Start Here | Key Tables   | Primary Actions  |
|------------------------------|------------|--|--|
| Access control implementer   | X.3, X.6   | Disclosure Profile Matrix; Purpose/TTL Matrix                | Configure access tiers, purpose codes, TTL enforcement   |
| Reviewer / examiner          | X.4, X.5   | Query-Safe View Table; Sufficiency Matrix                    | Select appropriate view; assess sufficiency for purpose  |
| Privacy / compliance officer | X.9, X.8   | Over-Disclosure Prevention Matrix; Post-Access Review Matrix | Monitor disclosure controls; review PARP completion      |
| System designer              | X.1, X.10  | Output Taxonomy; Proof-Based Output Table                    | Design output generation layer; implement VOP capability |

# Appendix Y — Cross-Border Portability, Conflict-of-Process Handling, and Jurisdiction-Bounded Review

## Y.0 Purpose and Reader Orientation

This appendix deepens Appendix R with a complete operational model for cross-border and cross-domain evidence portability. It addresses how evidence artifacts maintain coherence when products, authorizations, or review processes cross jurisdictional or institutional boundaries — without assuming legal harmonization.

## Y.1 Portability Taxonomy

### Portability Taxonomy Table:

| Portability Type          | Code      | Description  | Example   |
|---------------------------|-----------|--|---|
| Product portability       | PORT-PROD | Product manufactured in one jurisdiction; distributed/dispensed in another     | Medicine manufactured in Jurisdiction B; dispensed in Jurisdiction A        |
| Authorization portability | PORT-AUTH | Prescription issued in one jurisdiction; presented for dispensation in another | Prescription from Jurisdiction A presented at Jurisdiction B pharmacy       |
| Evidence portability      | PORT-EVID | Evidence artifacts generated under one framework/format transported to another | Foreign provenance manifest imported into framework                         |
| Review portability        | PORT-REV  | Reviewer in one jurisdiction accessing evidence generated in another           | Jurisdiction A examiner reviewing dispensation evidence from Jurisdiction B |
| Claim portability         | PORT-CLM  | Claim for reimbursement crosses jurisdictional benefit boundaries              | Cross-border healthcare reimbursement                                       |
| Offboarding portability   | PORT-OFFB | Evidence transitioned from framework to legacy system in different domain      | Framework evidence archived; legacy system in different jurisdiction        |

## Y.2 Cross-Border and Cross-Domain Transfer Principles

### Transfer Principle Matrix:

| Principle                       | Requirement  | Violation Response   |
|---------------------------------|--|--|
| Evidence integrity preservation | Transferred evidence retains content-addressed integrity markers; hash verification at both source and destination                         | Integrity failure at destination → BRK-INTEG; transfer rejected or quarantined     |
| Format conversion documentation | When evidence format is converted (e.g., foreign provenance format → framework manifest), the conversion is documented with mapping record | Undocumented conversion → evidence treated as CB-3 (Low Confidence) per Appendix S |
| Equivalence                     | Foreign credentials, evidence  | No equivalence assessment →  |

| <b>Principle</b>                | <b>Requirement</b>  | <b>Violation Response</b>   |
|---------------------------------|---|---|
| assessment                      | standards, or processes assessed for functional equivalence before reliance   | issuer treated as ISSU_UNVERIFIED; evidence as CB-3                                   |
| Jurisdiction-bounded disclosure | Evidence disclosed to foreign reviewer only under documented purpose, TTL, and applicable data transfer constraints             | Cross-border disclosure without documented authority → access abuse (ABP-008 variant) |
| No automatic canonicalization   | Foreign evidence does not automatically become canonical state in receiving jurisdiction; adoption requires explicit assessment | Foreign evidence treated as canonical without assessment → governance violation       |

### Y.3 Jurisdiction-Bounded Review Model

#### Jurisdiction-Bounded Review Matrix:

| <b>Review Scenario</b>  | <b>Jurisdiction A Reviewer</b>  | <b>Jurisdiction B Evidence</b>                        | <b>Access Conditions</b>  |
|---|---|---|---|
| Product imported from B to A; A reviewer examines provenance          | Access to provenance manifest (may be in B's format)                    | Provenance events from B custody chain                | Tier 1 with cross-border purpose code; format conversion if needed; equivalence note      |
| Prescription from A presented in B; B reviewer verifies authorization | Access to AES (generated under A's credentialing)                       | A's credential verification records                   | Tier 1; A credential treated as ISSU_UNVERIFIED unless equivalence established            |
| Cross-border recall; both jurisdictions review scope                  | Each jurisdiction accesses own custody evidence                         | Counterpart jurisdiction provides scope determination | Tier 1 within each jurisdiction; cross-border information shared per documented agreement |
| Dispute involving parties in both jurisdictions                       | Each jurisdiction's dispute authority reviews own-jurisdiction evidence | Shared evidence per agreement                         | Tier 1 minimum; Tier 2 requires dual-control from both jurisdictions                      |

### Y.4 Conflict-of-Process Taxonomy

#### Conflict-of-Process Taxonomy Table:

| <b>Conflict Type</b> | <b>Code</b> | <b>Description</b>  | <b>Resolution Approach</b>   |
|----------------------|-------------|---|--|
| Format conflict      | COP-FMT     | Evidence generated in incompatible format; cannot be directly ingested        | Format conversion with documented mapping; CB-3 confidence until corroborated      |
| Standard conflict    | COP-STD     | Different evidence standards (continuous monitoring vs. periodic attestation) | Equivalence assessment; institutional quality acceptance; documented qualification |
| Temporal             | COP-TMP     | Different freshness windows   | Apply stricter of the two standards;   |

| <b>Conflict Type</b> | <b>Code</b> | <b>Description</b>  | <b>Resolution Approach</b>   |
|----------------------|-------------|---|--|
| conflict             |             | or validity period interpretations                          | document basis   |
| Authority conflict   | COP-ATH     | Credential recognized in one jurisdiction but not another   | ISSU_UNVERIFIED in receiving jurisdiction; supplemental verification or local re-authorization |
| Retention conflict   | COP-RET     | Different retention requirements across jurisdictions       | Apply longer retention; document basis; monitor for changes                                    |
| Disclosure conflict  | COP-DIS     | One jurisdiction requires disclosure that another prohibits | Minimized disclosure; proof-based verification where possible; documented legal constraint     |

## Y.5 Portable Evidence Set and Handoff Requirements

### Portable Evidence Set and Handoff Matrix:

| <b>Evidence Type</b> | <b>Portable Elements</b>                                  | <b>Non-Portable Elements</b>  | <b>Handoff Documentation</b>   |
|----------------------|---|---|--|
| PAES (product)       | CPO, batch/lot, provenance manifest, integrity markers    | Manufacturer commercial terms, pricing arrangements                 | Format conversion record; equivalence assessment for manufacturer credential           |
| AES (authorization)  | Authorization type, validity state, scope summary         | Prescriber personal details (unless Tier 2 authorized cross-border) | Credential equivalence assessment; scope verification against destination jurisdiction |
| CES (custody)        | Custody event chain, handoff records, condition logs      | Custodian commercial identity, facility addresses                   | Border transit events documented; custody gap coverage for transit period              |
| SES (safety)         | Product safety profile reference, evidence class presence | Patient-specific clinical data (non-portable by default)            | Source data version mapping to destination jurisdiction equivalents                    |
| CLM-EP (claims)      | Claim status, gate results                                | Benefit plan specifics, pricing details                             | Cross-border reimbursement agreement reference (if applicable)                         |

## Y.6 Current-Reference State, Historical State, and Parallel-State Management

### Current-Reference / Historical / Parallel-State Matrix:

| <b>Scenario</b>  | <b>State Management</b>  | <b>Evidence Requirement</b>                                    |
|--|--|--|
| Product evidence imported; destination assigns own canonical state | Foreign evidence preserved as historical; destination evidence becomes canonical | Both versions retained; linkage documented                     |
| Authorization recognized cross-border with equivalence             | Foreign authorization adopted as current-reference with equivalence flag         | Equivalence assessment record; supplemental local verification |
| Conflicting safety assessments between                             | Parallel states maintained; dispensation uses destination                        | Both assessments preserved; dispensation references            |

| Scenario   | State Management   | Evidence Requirement  |
|--|--|---|
| jurisdictions  | jurisdiction's assessment  | destination SES   |
| Recall issued in one jurisdiction; affects products in another | Both jurisdictions maintain their own recall state for affected products | Cross-border notification evidence; jurisdiction-specific disposition records |

## Y.7 Bounded Rebinding and Destination Adoption Logic

### Destination Rebinding and Adoption Matrix:

| Evidence Type          | Adoption Condition                                     | Rebinding Steps   | Documentation                              |
|------------------------|--|---|--|
| Product identity (CPO) | Product registered in destination product registry     | Cross-reference mapping: source CPO ↔ destination product identifier              | Mapping record with integrity verification |
| Issuer credential      | Equivalence assessment confirms functional equivalence | Destination AES generated with equivalence_assessed flag                          | Equivalence assessment record              |
| Custody chain          | Border transit documented as explicit custody events   | Source chain endpoint linked to destination chain entry via border transit events | Border transit custody event records       |
| Safety evidence        | Source data mapped to destination equivalents          | Destination SES generated referencing destination formulary/interaction databases | Source-to-destination data mapping record  |

## Y.8 Cross-Border Disputes, Holds, and Unresolved-State Carry-Forward

### Cross-Border Dispute and Hold Matrix:

| Situation                                       | Jurisdiction A Action                                     | Jurisdiction B Action   | Coordination Requirement  |
|---|---|---|---|
| Product hold in A; product already shipped to B | A issues hold notification to B                           | B applies hold-only containment on received units             | Cross-border notification evidence; B acknowledges A's hold                       |
| Authorization disputed between jurisdictions    | A holds pending dispensation under disputed authorization | B (if product is there) holds dispensation pending resolution | Dispute evidence shared per agreement; determination by competent authority       |
| Recall in A; product distributed to B           | A issues recall notification to B                         | B executes recall per own procedures for affected units       | Consolidated recall tracking; per-jurisdiction disposition records                |
| Unresolved break at border transit              | Break carried forward as open in both jurisdictions       | Both jurisdictions maintain break in open breaks register     | Cross-border break coordination; resolution requires both jurisdictions to update |

## Y.9 Reviewer-Safe Verification and Minimal Disclosure Across Domains

### Reviewer-Safe Cross-Domain Verification Matrix:

| Cross-Domain Review                      | Disclosure Control  | Minimum Output   | Maximum Output  |
|--|---|--|---|
| A reviewer examining B product evidence  | B evidence disclosed at Tier 1 with pseudonymization per B's standards                | Product-Posture-View (Appendix X)                          | Full PAES only under documented cross-border agreement and Tier 2 with B's approval |
| A reviewer examining B authorization     | B credential details disclosed only if equivalence established and purpose documented | VOP confirming ISSU_CONFIRMED (if VOP available)           | AES detail under Tier 2 with dual jurisdiction approval                             |
| Joint investigation (both jurisdictions) | Each jurisdiction discloses per own tiered access rules                               | Shared investigation summary with pseudonymized references | Full evidence sharing under formal cross-border investigation agreement             |

## Y.10 Governance, Accountability, and Material Change Controls for Portability

### Governance and Accountability Matrix:

| Governance Activity                   | Responsible                                  | Accountable                                | Evidence   |
|---------------------------------------|--|--|--|
| Equivalence assessment                | Receiving jurisdiction operational function  | Receiving jurisdiction governance body     | Equivalence assessment record; approval                    |
| Cross-border disclosure authorization | Both jurisdictions' access control functions | Both governance bodies                     | Documented agreement; access event logs                    |
| Border transit custody documentation  | Transferring and receiving entities          | Both jurisdictions' surveillance functions | Border transit custody events                              |
| Cross-border recall coordination      | Recall authority (issuing jurisdiction)      | Both jurisdictions' governance bodies      | Recall notifications; acknowledgments; disposition records |
| Portability material change           | Operational function detecting change        | Governance body in affected jurisdiction   | Material change trigger; governance response               |

## Y.11 Reviewer / Examiner Query Families for Portability and Conflict Handling

### Reviewer / Examiner Query Family Table:

| Query  | Purpose                            | Tier   | Expected Output  |
|--|------------------------------------|--------|--|
| "Show all cross-border evidence imports for period X"                | Audit of foreign evidence adoption | Tier 1 | List of imported evidence with equivalence assessment status         |
| "Identify products with foreign provenance in dispensable inventory" | Product integrity review           | Tier 1 | Product list with provenance source jurisdiction and confidence band |
| "Show unresolved cross-border  | Cross-border                       | Tier 1 | Open holds with cross-border   |

| Query  | Purpose                      | Tier            | Expected Output                     |
|--|------------------------------|-----------------|-------------------------------------|
| holds"                                       | containment review           |                 | origin and coordination status      |
| "Verify equivalence assessments are current" | Equivalence freshness review | Tier 0 / Tier 1 | Equivalence assessment aging report |

## Y.12 Offboarding, Legacy Compatibility, and Transition Closure

### Offboarding and Transition Closure Matrix:

| Portability Element                | Transition Handling  | Closure Condition  |
|------------------------------------|--|--|
| Cross-border evidence linkage      | Archive cross-reference mappings; export linkage records to legacy               | All cross-references documented; no orphaned linkages            |
| Equivalence assessments            | Archive assessments; export status to legacy                                     | All active assessments documented; expiry dates noted            |
| Open cross-border holds/breaks     | Resolve or transfer per governance agreement; document in open breaks disclosure | All items resolved or transferred with accountability assignment |
| Cross-border notification channels | Decommission framework channels; establish legacy contact points                 | Contact handoff documented; both jurisdictions acknowledge       |

## Y.13 Worked Mini-Scenarios

### Worked Scenario Summary Table:

| Scenario  | Portability Type    | Conflict  | Resolution  |
|---|---------------------|---|---|
| Biologic imported from Jurisdiction B; storage monitoring was periodic attestation (not continuous) | PORT-PROD + COP-STD | Standard conflict: continuous vs. periodic monitoring | Institutional quality accepts B's standard with documented qualification; provenance COMPLETE with CB-2 confidence annotation   |
| Patient travels from A to B with prescription; B pharmacy cannot verify A's prescriber credentials  | PORT-AUTH + COP-ATH | Authority conflict: credential not recognized         | Dispensation blocked; patient referred to local prescriber for B-jurisdiction prescription  |
| Recall issued in A for batch distributed to A, B, and C   | PORT-PROD (recall)  | Multi-jurisdiction recall coordination                | Framework recall record as canonical; jurisdiction-specific notifications and dispositions documented separately; consolidated closure requires all-jurisdiction accounting |

## Y.14 Reader Action Map

| Reader Profile | Start Here | Key Tables                    | Primary Actions           |
|----------------|------------|-------------------------------|---------------------------|
| Import/export  | Y.5,       | Portable Evidence Set Matrix; | Document handoff; perform |

| <b>Reader Profile</b>                   | <b>Start Here</b> | <b>Key Tables</b>  | <b>Primary Actions</b>   |
|---|-------------------|--|--|
| coordinator                             | Y.7               | Rebinding Matrix   | equivalence assessment   |
| Cross-border reviewer                   | Y.3,<br>Y.9       | Jurisdiction-Bounded Review Matrix; Cross-Domain Verification Matrix | Access foreign evidence per bounded rules                          |
| Governance (cross-border)               | Y.10              | Governance Matrix  | Approve equivalence assessments; authorize cross-border disclosure |
| Recall coordinator (multi-jurisdiction) | Y.8               | Cross-Border Dispute and Hold Matrix                                 | Coordinate cross-jurisdiction recall response                      |



# Appendix Z — Performance, Service-Level Objectives, Operational Resilience, and Recovery Discipline

## Z.0 Purpose and Reader Orientation

This appendix deepens Appendix T with operational resilience controls, degradation logic, backpressure handling, replay capacity, recovery discipline, and incident classification specific to healthcare workflow domains. It defines how the framework operates under stress and how it recovers.

## Z.1 Performance Taxonomy by Workflow Class

**Workflow Performance Taxonomy Table:**

| Workflow Class               | Latency Sensitivity         | Throughput Sensitivity                  | Integrity Sensitivity                          | Example                                 |
|------------------------------|-----------------------------|---|--|---|
| Dispensation gate evaluation | High — patient waiting      | Moderate (batch capability for refills) | Critical — incorrect gate result is unsafe     | Pharmacy dispensation at point of care  |
| Provenance verification      | Moderate — at receipt       | Moderate (batch for shipment receipt)   | Critical — counterfeit detection depends on it | Distributor receiving verification      |
| Authorization verification   | High — at dispensation      | Low (per-transaction)                   | Critical — unauthorized dispensation           | Prescription validity check at pharmacy |
| Safety evidence generation   | Moderate — pre-dispensation | Low                                     | Critical — decision safety depends on it       | CDSS contraindication check             |
| Reconciliation execution     | Low — batch process         | High (large artifact populations)       | High — break detection depends on it           | Daily custody-provenance alignment      |
| Claim processing             | Low–Moderate                | High (volume-dependent)                 | High — financial integrity                     | Batch claim adjudication                |
| Reviewer evidence retrieval  | Low (SLO-bounded)           | Low                                     | High — evidence integrity                      | Examiner query response                 |

## Z.2 Service-Level Objectives and Timeliness Bands

**SLO and Timeliness Band Matrix:**

| Workflow                      | Target Latency    | Acceptable Degradation     | Unacceptable Threshold                               |
|-------------------------------|-------------------|----------------------------|--|
| Dispensation gate (all gates) | <30 seconds total | <2 minutes (degraded mode) | >5 minutes — escalate to manual confirmation pathway |
| Provenance                    | <5 minutes per    | <15 minutes                | >30 minutes — accept with                            |

| <b>Workflow</b>                   | <b>Target Latency</b>                | <b>Acceptable Degradation</b> | <b>Unacceptable Threshold</b>                         |
|-----------------------------------|--------------------------------------|-------------------------------|---|
| verification at receipt           | product unit                         |                               | condition annotation; re-verify batch                 |
| Authorization freshness check     | <10 seconds                          | <30 seconds                   | >2 minutes — conservative FAIL; hold pending re-check |
| Safety evidence generation (CDSS) | <15 seconds                          | <1 minute                     | >2 minutes — manual confirmation pathway activated    |
| Reconciliation cycle              | Within cadence window (daily/weekly) | +24 hours delay               | +48 hours — governance notification; BRK-FRESH-005    |
| Claim gate evaluation             | <1 minute per claim                  | <5 minutes                    | >10 minutes — batch queue management                  |
| Evidence retrieval (standard)     | <48 hours                            | <5 business days              | >5 business days — governance escalation              |

### Z.3 Observability and Integrity Signals

**Observability and Integrity Signal Table:**

| <b>Signal Category</b> | <b>Signals Monitored</b>   | <b>Alert Threshold</b>  | <b>Response</b>  |
|------------------------|--|---|--|
| Gate performance       | Gate evaluation latency, gate pass/fail rates, gate timeout frequency      | Latency >2x target; pass rate drop >2% from baseline; timeout rate >1%  | Performance investigation; capacity assessment           |
| Evidence storage       | Content-address verification pass rate, retrieval latency, replication lag | Any verification failure; retrieval >2x SLO; replication lag >threshold | Integrity investigation (BRK-INTEG); storage remediation |
| Reconciliation health  | Reconciliation execution on time, break detection rate, break aging        | Missed cycle; break rate spike >2x baseline; aging >SLA                 | Reconciliation priority; governance notification         |
| Reviewer access        | Access volume, TTL compliance, PARP completion rate                        | Volume anomaly; TTL overrun; PARP overdue                               | Access governance review                                 |
| Claim pipeline         | Claim aging, gate failure rate, adjustment rate                            | Aging >SLA; gate failure spike; adjustment rate >threshold              | Pipeline investigation; capacity management              |

### Z.4 Degraded Modes and Graceful Degradation Logic

**Degraded Mode Matrix:**

| <b>Component Failure</b>       | <b>Degraded Mode</b>                    | <b>Capability Retained</b>           | <b>Capability Lost</b>            | <b>Restoration Trigger</b>                   |
|--------------------------------|---|--------------------------------------|-----------------------------------|--|
| Revocation service unavailable | Conservative FAIL for revocation checks | Dispensation via manual confirmation | Automated revocation verification | Service restored; queued re-checks processed |

| Component Failure                | Degraded Mode  | Capability Retained   | Capability Lost                                  | Restoration Trigger  |
|----------------------------------|--|---|--|--|
|                                  | (per Baseline D)   | pathway; hold-only on automated dispensation                                    |  |  |
| CDSS unavailable                 | Manual safety assessment pathway activated                     | Dispensation with pharmacist manual safety check (DS-05 documentation required) | Automated contraindication/interaction screening | CDSS restored; batch re-screening of manual-pathway dispensation |
| Evidence storage degraded        | Read from replica; write queued                                | Evidence retrieval (from replica); evidence generation (queued)                 | Real-time write confirmation                     | Primary storage restored; queue drained                          |
| Reconciliation engine offline    | Reconciliation deferred; manual break monitoring               | Custody event logging continues; evidence generation continues                  | Automated reconciliation; break detection        | Engine restored; catch-up reconciliation executed                |
| Claim processing system degraded | Claim queue accumulates; priority processing for urgent claims | Claim submission; priority adjudication   | Batch processing; aging monitoring               | System restored; backlog processing initiated                    |

## Z.5 Backpressure, Queues, and Workload Management

### Queue and Backpressure Management Matrix:

| Queue                        | Normal Capacity              | Backpressure Trigger                   | Backpressure Action   | Priority Rule  |
|------------------------------|------------------------------|--|---|--|
| Dispensation gate queue      | Real-time (no queue)         | >5 second latency sustained >5 minutes | Activate degraded mode; alert operations                      | Controlled substances and narrow therapeutic index prioritized |
| Reconciliation queue         | Daily batch capacity         | Queue depth >2x normal                 | Alert operations; defer non-critical reconciliation types     | Provenance-custody alignment first; aggregate holdings second  |
| Claim processing queue       | Hourly batch capacity        | Queue age >24 hours                    | Governance notification; expedited processing for aged claims | Claims approaching adjudication SLA processed first            |
| Evidence retrieval queue     | Per SLO capacity             | Queue age >SLO target                  | Alert operations; increase retrieval resources                | Emergency retrieval prioritized; standard deprioritized        |
| Integrity verification queue | Continuous sampling capacity | Backlog >48 hours                      | Alert operations; prioritize critical evidence                | Active dispensation evidence prioritized                       |

## Z.6 Evidence Continuity Under Stress

### Evidence Continuity Under Stress Matrix:

| Stress Condition               | Evidence Generation                       | Evidence Storage                           | Evidence Retrieval                  | Reconciliation   |
|--------------------------------|---|--|-------------------------------------|--|
| High transaction volume spike  | Continue generating; queue if needed      | Write queue; no loss                       | May degrade to SLO+24h              | Defer to next scheduled cycle                            |
| Storage system partial failure | Continue generating to queue              | Queue writes; replicate to surviving nodes | Serve from replica                  | Continue if replica accessible                           |
| Network partition              | Local generation continues; sync deferred | Local write; sync on reconnection          | Local retrieval; remote unavailable | Deferred until partition healed; catch-up reconciliation |
| Multi-component failure        | Minimal evidence generation (ILS only)    | Emergency local storage                    | Emergency retrieval from local only | Suspended; post-recovery catch-up                        |

## Z.7 Replay Capacity and Reconstruction Readiness

### Replay Capacity and Readiness Matrix:

| Replay Type                      | Data Required   | Storage Location                    | Readiness Target                                | Degraded Readiness     |
|----------------------------------|---|-------------------------------------|---|------------------------|
| Product authenticity replay      | CPO versions; PAES; provenance manifest                                 | Content-addressed primary + replica | <1 hour retrieval for any product               | <24 hours from replica |
| Authorization lifecycle replay   | AES versions; EP Delta chain; supersession chain                        | Content-addressed primary + replica | <1 hour retrieval                               | <24 hours from replica |
| Custody chain replay             | CES event chain; storage condition logs                                 | Content-addressed primary + replica | <1 hour retrieval                               | <24 hours from replica |
| Clinical decision replay         | Decision state records; referenced evidence classes; algorithm versions | Content-addressed primary + replica | <4 hours retrieval (includes version snapshots) | <48 hours              |
| Full dispensation reconstruction | DEP-H + all upstream evidence sets                                      | All evidence stores                 | <4 hours  | <48 hours              |

## Z.8 Restoration and Recovery Discipline

### Restoration and Recovery Matrix:

| Failure Type             | Recovery Priority | RTO     | RPO                      | Verification                                |
|--------------------------|-------------------|---------|--------------------------|---|
| Evidence storage failure | Critical          | 4 hours | 15 minutes (replication) | Hash verification of all restored artifacts |
| Gate evaluation system   | Critical          | 1 hour  | Zero (stateless; re-     | Test gate evaluation with known             |

| Failure Type                   | Recovery Priority | RTO      | RPO                         | Verification  |
|--------------------------------|-------------------|----------|-----------------------------|---|
| failure                        |                   |          | evaluate)                   | inputs  |
| Reconciliation engine failure  | High              | 24 hours | Last completed cycle        | Catch-up reconciliation; break inventory comparison |
| CDSS failure                   | High              | 4 hours  | Zero (re-query)             | Test CDSS with known scenarios                      |
| Claim processing failure       | Moderate          | 24 hours | Last processed batch        | Queue reconciliation; claim count verification      |
| Reviewer access system failure | Moderate          | 24 hours | Zero (access logs separate) | Access control verification                         |

## Z.9 Incident Classification and Escalation Logic

### Incident Classification and Escalation Matrix:

| Incident Category  | Severity         | Notification  | Escalation  |
|--|------------------|---|---|
| Evidence integrity failure (hash mismatch, silent overwrite) | SEV-1 (Critical) | Governance + regulatory liaison within 2 hours              | Immediate containment; forensic investigation               |
| Dispensation gate system failure (patients waiting)          | SEV-1 (Critical) | Operations management immediately; governance within 1 hour | Manual confirmation pathway activated; capacity remediation |
| Reconciliation missed >2 consecutive cycles                  | SEV-2 (High)     | Governance within 8 hours                                   | Priority reconciliation; break risk assessment              |
| Evidence storage degraded (replica serving)                  | SEV-2 (High)     | Operations within 1 hour                                    | Storage recovery; capacity assessment                       |
| Claim processing backlog >48 hours                           | SEV-3 (Moderate) | Operations management within 24 hours                       | Capacity increase; priority queue activation                |
| Reviewer access system slow (>2x SLO)                        | SEV-3 (Moderate) | Operations within 24 hours                                  | Performance investigation                                   |

## Z.10 Governance, Change Control, and Materiality Triggers for Resilience

### Governance and Materiality Trigger Matrix:

| Trigger                            | Materiality Threshold   | Governance Response                               | Documentation                                 |
|------------------------------------|---|---|---|
| SLO breach (any critical workflow) | Any single breach for dispensation/safety; 3+ breaches for others | Governance notification; root cause investigation | Incident record; RCA; remediation plan        |
| Degraded mode activation           | Any activation  | Operations notification; governance if >4 hours   | Degraded mode activation/deactivation records |
| Evidence integrity incident        | Any instance  | Immediate governance notification                 | PB per Appendix F; forensic investigation     |
| Replay capacity below target       | Any critical replay type below readiness target                   | Governance notification; capacity                 | Readiness assessment record                   |

| Trigger                   | Materiality Threshold | Governance Response             | Documentation                     |
|---------------------------|-----------------------|---------------------------------|-----------------------------------|
|                           |                       | assessment                      |                                   |
| Recovery time exceeds RTO | Any instance          | Post-recovery governance review | Incident record; RTO gap analysis |

## Z.11 Reviewer / Examiner Visibility into Performance and Resilience State

### Reviewer / Examiner Visibility Matrix:

| Metric Category       | Tier 0 Output                      | Tier 1 Output  |
|-----------------------|------------------------------------|--|
| Gate performance      | Aggregate latency and pass rates   | Per-dispensation-point gate performance; timeout incidents |
| Evidence integrity    | Verification pass rate percentage  | Individual integrity failure records                       |
| Reconciliation health | Cycle completion rate; break trend | Individual missed cycles; break aging details              |
| Degraded mode events  | Activation count and duration      | Individual degraded mode records with affected scope       |
| Claim pipeline health | Aggregate aging and throughput     | Individual claim aging; backlog composition                |

## Z.12 Closure Criteria and Post-Incident Review

### Closure Criteria Matrix:

| Incident Type               | Closure Criteria   | Post-Incident Review                                   | Documentation                                    |
|-----------------------------|--|--|--|
| Evidence integrity incident | Valid version restored; dependent states re-verified; forensic complete            | Mandatory within 10 business days                      | PB sealed; lessons learned; control improvement  |
| System failure incident     | Service restored within RTO; catch-up processing complete; no data loss beyond RPO | Within 5 business days                                 | Incident record; RTO/RPO compliance; remediation |
| Degraded mode event         | Normal mode restored; backlog cleared; evidence continuity verified                | If duration >4 hours: within 5 business days           | Degraded mode record; backlog processing log     |
| SLO breach                  | Performance restored to target; root cause addressed                               | If repeated: governance review within 10 business days | Breach record; RCA; capacity plan                |

## Z.13 Offboarding, Portability, and Resilience Carry-Forward

### Offboarding and Resilience Carry-Forward Matrix:

| Resilience Element       | Carry-Forward Requirement                            | Legacy Expectation                    |
|--------------------------|--|---------------------------------------|
| SLO targets              | Documented in offboarding proof bundle for reference | Legacy system maintains own SLOs      |
| Degraded mode procedures | Documented; not directly portable                    | Legacy system defines own degradation |

| <b>Resilience Element</b>     | <b>Carry-Forward Requirement</b>   | <b>Legacy Expectation</b>                    |
|-------------------------------|--|--|
| Replay capacity               | All evidence archived per retention; replay capability preserved through archive | Archive retrieval SLO documented             |
| Incident history              | Incident records transferred as part of evidence archive                         | Available for post-offboarding investigation |
| Open incidents at offboarding | Resolved before offboarding or documented in open breaks disclosure              | Accountability assigned per Section 13.6     |

## Z.14 Worked Mini-Scenarios

### Worked Scenario Summary Table:

| <b>Scenario</b>   | <b>Stress Condition</b> | <b>Degraded Mode</b>   | <b>Recovery</b>   | <b>Closure</b>  |
|---|-------------------------|--|---|---|
| CDSS unavailable during morning dispensation peak                         | System failure          | Manual safety assessment pathway for 2 hours; 47 dispensation events via manual confirmation | CDSS restored; batch re-screening of 47 events confirms no safety concern                                       | Incident closed; RTO met (4h target; 2h actual); post-incident review documents cause (database connection pool exhaustion) |
| Evidence storage primary node failure                                     | Storage failure         | Replica serving reads; writes queued   | Primary restored in 3 hours; queue drained in 1 hour; hash verification of all queued writes confirms integrity | Incident closed; RPO met (15min target; 8min actual replication lag)  |
| Reconciliation engine offline for 36 hours (exceeds 24h acceptable delay) | Engine failure          | Reconciliation deferred; manual break monitoring   | Engine restored; catch-up reconciliation detects 2 SEV-3 breaks that accumulated during outage                  | Breaks resolved per standard workflow; governance notified of SLO breach; capacity improvement planned                      |

## Z.15 Reader Action Map

| <b>Reader Profile</b> | <b>Start Here</b> | <b>Key Tables</b>                               | <b>Primary Actions</b>                               |
|-----------------------|-------------------|---|--|
| Operations / SRE      | Z.4–Z.5           | Degraded Mode Matrix; Queue Matrix              | Implement degradation logic; configure backpressure  |
| Incident responder    | Z.9, Z.8          | Incident Classification Matrix; Recovery Matrix | Classify incident; execute recovery                  |
| Governance            | Z.10, Z.12        | Materiality Trigger Matrix; Closure Criteria    | Review incidents; approve remediation                |
| Examiner              | Z.11, Z.2         | Visibility Matrix; SLO Matrix                   | Assess operational resilience; verify SLO compliance |

# Appendix AA — Applied Operational Scenarios and Benefit Realization Across Medicines, Health Products, and Clinical Decisions

## AA.0 Purpose and Reader Orientation

This appendix translates the framework into concrete operational scenarios showing practical benefits. Each scenario is fictional and demonstrates how multiple framework components interact to produce tangible improvements over status-quo healthcare workflows.

## AA.1 How to Read the Scenarios

Each scenario includes: a setup describing the operational context, a workflow table showing step-by-step evidence flow, a "without framework" comparison showing what happens without the framework's controls, a "with framework" description showing improved handling, and a benefit summary.

## AA.2 Scenario Design Principles

### Scenario Design Principles Table:

| Principle            | Application   |
|----------------------|---|
| Realistic complexity | Each scenario involves multiple framework domains interacting                     |
| No real entities     | All hospitals, pharmacies, manufacturers, prescribers, and patients are fictional |
| Evidence-centric     | Every benefit traces to specific evidence artifacts, gates, or controls           |
| Non-promotional      | Scenarios show operational improvements, not ideological advocacy                 |
| Failure-inclusive    | Scenarios include failures, holds, and corrections — not only happy paths         |
| Reviewer-accessible  | Each scenario shows how an examiner would verify the outcome                      |

## AA.3 Applied Scenario 1 — Medicine Release, Provenance Break Risk, and Hold-Only Containment

**Setup.** Regional Distributor RD-North receives 3,000 units of Product Alpha (a biologic) from Manufacturer PharmaCo. At receiving verification, 2,950 units pass CPO verification. 50 units show a hash chain break in the provenance manifest at the packaging stage.

### Scenario 1 Workflow Table:

| Step    | Without Framework                                | With Framework  | Evidence Produced   |
|---------|--|---|---|
| Receipt | Visual inspection only; all 3,000 units accepted | Automated CPO + provenance verification; 2,950 PASS; 50 flagged with BRK-PROV-002 | CUS_RECEIPT with verification results; BRK detection record |

| Step                  | Without Framework   | With Framework   | Evidence Produced   |
|-----------------------|---|--|---|
| Containment           | No containment mechanism; all units enter dispensable inventory                           | Hold-only on 50 flagged units; 2,950 proceed normally  | CUS_HOLD_ENTRY for 50 units; 2,950 units proceed through standard custody chain |
| Investigation         | If problem discovered later: manual investigation across paper records                    | Automated hash chain analysis identifies packaging stage as break point; Manufacturer contacted  | Investigation record; manufacturer query  |
| Resolution            | Slow; evidence scattered; may result in entire shipment quarantine                        | Manufacturer confirms: 50 units had packaging system error (label printed before system hash committed); provides corrected hash chain | Correction EP Delta; manufacturer attestation                                   |
| Release               | Delayed for entire shipment; or no investigation if problem not detected                  | 50 units released after correction verified; 2,950 units never delayed   | CUS_HOLD_RELEASE for 50; correction evidence preserved                          |
| Examiner verification | "How do I know these products are authentic?" — limited to paper certificates of analysis | Examiner runs EQP-001: complete provenance chain for any unit; EQP-003: full chain replay with integrity verification at each link     | Examiner query results with evidence references                                 |

**Benefit:** 2,950 units experienced zero delay. 50 units contained and resolved in hours, not days. Complete evidence trail preserved. Examiner can independently verify any unit's authenticity.

#### AA.4 Applied Scenario 2 — Prescription Legitimacy, Expiry / Revocation Ambiguity, and Bounded Reviewer Escalation

**Setup.** Pharmacy BetaRx receives a refill request for Patient M's chronic medication (Product Gamma, 90-day supply). Gate G2 flags the prescription: prescriber Dr. Torres's credential was updated 12 days ago with an ambiguous update type.

##### Scenario 2 Workflow Table:

| Step           | Without Framework  | With Framework   | Evidence Produced                    |
|----------------|--|--|--------------------------------------|
| Refill request | Pharmacy checks prescription on file; assumes still valid                    | Gate G2: AES retrieved; credential update detected; type = AMBIGUOUS                                     | Gate G2 PENDED result                |
| Investigation  | Pharmacist calls prescriber office; may take hours or days; no documentation | Tier 1 access: reviewer examines AES (pseudonymized); determines credential update was scope restriction | Tier 1 access record; review finding |

| Step         | Without Framework  | With Framework   | Evidence Produced                         |
|--------------|--|--|---|
| Resolution   | If prescriber unreachable: dispensation may proceed on assumption, or patient denied       | Prescription held; prescriber confirms scope restriction; refers to Dr. Chen for Product Gamma; Dr. Chen issues new prescription | Supersession record; new AES for Dr. Chen |
| Dispensation | Dispensed under potentially invalid authority; or patient denied without clear explanation | All gates pass under Dr. Chen's prescription; dispensation proceeds  | DEP-H with complete gate results          |
| Post-event   | No audit trail of investigation or resolution  | Complete evidence: original gate failure, Tier 1 investigation, supersession, new authorization, successful dispensation         | Full audit trail; PARP for Tier 1 access  |

**Benefit:** Patient received medication without undue delay. Potentially invalid dispensation prevented. Complete audit trail of decision-making preserved. Examiner can verify the entire escalation chain.

### AA.5 Applied Scenario 3 — Controlled Dispensation with Custody Conflict and Correction Path

**Setup.** Hospital Delta's automated dispensing cabinet shows 20 units of Product Sigma (a controlled substance). The pharmacy management system shows 22 units. Gate G4 (custody integrity) fails for the next dispensation request due to the 2-unit discrepancy.

#### Scenario 3 Workflow Table:

| Step                  | Without Framework   | With Framework  | Evidence Produced  |
|-----------------------|---|---|--|
| Discrepancy detection | Discovered during manual monthly count; 2 units of controlled substance unaccounted for | BRK-CUST-004 detected at dispensation attempt; SEV-2 (controlled substance, >0 variance)  | Break detection record; custody evidence showing discrepancy         |
| Containment           | Cabinet may continue dispensing while investigation proceeds                            | Hold-only on Product Sigma dispensation from this cabinet; other products unaffected  | CUS_HOLD_ENTRY scoped to Product Sigma at this cabinet               |
| Investigation         | Paper-based count sheets reviewed; may take days  | Custody event chain replay: CES shows 22 units received (CUS_RECEIPT); 0 units dispensed since last reconciliation; cabinet sensor log shows 20 units | Investigation record; CES replay results; sensor log cross-reference |
| Root cause            | Difficult to determine with confidence  | Investigation reveals: 2 units removed for emergency kit restocking without logging custody event; nurse confirms                                     | Root cause: missing CUS_HANDOFF event; nurse statement               |

| Step       | Without Framework                       | With Framework   | Evidence Produced  |
|------------|---|--|--|
| Correction | Informal adjustment; documentation gaps | Correction EP Delta: CES updated with retroactive CUS_HANDOFF for 2 units to emergency kit; approval from pharmacy director + nursing supervisor | Correction EP Delta with approval chain; retroactive custody event |
| Release    | No formal release process               | Hold released after correction verified; post-correction reconciliation confirms alignment (20 + 2 = 22)   | CUS_HOLD_RELEASE; reconciliation report                            |

**Benefit:** Controlled substance discrepancy detected immediately (not at monthly count). Root cause identified in hours. Correction documented with dual-authority approval. Complete evidence trail for DEA or institutional audit.

## AA.6 Applied Scenario 4 — High-Impact Clinical Decision Support Review Under Minimal Disclosure Constraints

**Setup.** Hospital Delta's CDSS generates a dosage alert for Patient K: the calculated dose of Product Omega (narrow therapeutic index) is 15% above the standard maximum. Dr. Patel overrides the alert with documented clinical rationale (patient weight and renal function justify higher dose). Six months later, a quality review examines override patterns.

### Scenario 4 Workflow Table:

| Step                        | Without Framework  | With Framework  | Evidence Produced  |
|-----------------------------|--|---|--|
| Alert generation            | Alert generated; may or may not be logged                              | SAFETY_ALERT_GENERATED logged; DS-01 contraindication check references IntDB-v2026.06   | Alert ILS record; DS-01 with database version reference                          |
| Override                    | Override may be click-through with no documentation                    | Context-bound decision state generated with all evidence classes; DS-05 clinical rationale documented; Exceptional review posture assigned                                | Decision state record (Section 7.3) with all required fields                     |
| Dispensation                | Dispensed; override may not be linked to dispensation record           | DEP-H generated; gate G5 passes with override documentation; Exceptional review posture flagged   | DEP-H with SES reference including override; review posture flag                 |
| Quality review (T+6 months) | Reviewer requests full patient records; privacy concerns; slow process | Tier 1 access: reviewer sees override frequency for CDSS version (Tier 0: aggregate), then examines specific decision states (Tier 1: pseudonymized); no patient identity | Tier 0 report: 23 overrides in 6 months; Tier 1: specific decision state records |
| Finding                     | Finding based on incomplete  | Reviewer confirms: CDSS-v4.2 was current at override time; IntDB-v2026.06 was   | Review finding record; PARP  |

| Step    | Without Framework                                  | With Framework   | Evidence Produced                                   |
|---------|--|--|---|
|         | records; no version tracking                       | current; override rationale documented and clinically appropriate  | documenting scope and findings                      |
| Outcome | Unclear audit trail; potential compliance exposure | Complete evidence: alert, override, rationale, dispensation, quality review — all linked and replayable; no patient identity exposed during quality review | Full evidence chain preserved; no privacy violation |

**Benefit:** Quality review conducted with full clinical decision context but no patient identity exposure. Algorithm version tracking confirms override was assessed against current safety data. Complete evidence trail for institutional accreditation or regulatory examination.

## AA.7 Cross-Scenario Benefit Matrix

### Cross-Scenario Benefit Matrix:

| Benefit Category         | Scenario 1  | Scenario 2   | Scenario 3  | Scenario 4   |
|--------------------------|---|--|---|--|
| Faster detection         | Provenance break at receipt (minutes vs. post-incident) | Credential issue at refill (seconds vs. days)      | Custody discrepancy at dispensation (immediate vs. monthly count) | Override documented at decision time (immediate vs. retrospective) |
| Proportional containment | 50 units held; 2,950 unaffected                         | Single refill held; other dispensation unaffected  | Single product at single cabinet; other inventory unaffected      | Single decision flagged; other dispensation unaffected             |
| Evidence completeness    | Full provenance chain for every unit                    | Full authorization lifecycle with supersession     | Complete custody audit trail with correction                      | Complete decision context with version tracking                    |
| Reviewer access          | Examiner verifies any unit independently                | Examiner traces full escalation chain              | Examiner replays custody chain with correction                    | Examiner reviews without patient identity                          |
| Patient impact           | No delay for 2,950 units                                | Patient received medication via authorized pathway | Controlled substance properly accounted                           | Clinical rationale documented for ongoing care                     |

## AA.8 Before / After Operational Comparison

### Before / After Operational Comparison Table:

| Operational Dimension             | Before Framework   | After Framework   |
|-----------------------------------|--|---|
| Product authenticity verification | Paper certificates; visual inspection; post-incident investigation | Automated CPO + provenance verification at every receipt; real-time break detection |
| Authorization                     | Phone calls; assumption-based                                      | Automated gate evaluation; structured   |

| <b>Operational Dimension</b>     | <b>Before Framework</b>  | <b>After Framework</b>   |
|----------------------------------|--|--|
| verification                     | dispensation; paper trail  | escalation; evidence-linked supersession   |
| Custody integrity                | Monthly manual counts; delayed detection; paper-based reconciliation     | Continuous reconciliation; immediate break detection; content-addressed custody chain                |
| Clinical decision accountability | Click-through overrides; no version tracking; retrospective chart review | Context-bound decision states; algorithm version tracking; reviewer-safe replay                      |
| Examiner access                  | Ad hoc evidence gathering; inconsistent formats; weeks for retrieval     | Standardized evidence packs; query families; tiered access with SLOs                                 |
| Correction discipline            | Informal adjustments; overwritten records; no audit trail                | Non-destructive correction with EP Delta; approval chain; prior state preserved                      |
| Recall management                | Phone/fax notification; manual tracking; uncertain scope                 | Content-addressed recall tracking; aggregation hierarchy traversal; closure with 100% accountability |

## AA.9 Reviewer / Examiner Walkthrough View

### Reviewer / Examiner Walkthrough Matrix:

| <b>Examiner Task</b>                | <b>Scenario 1 Path</b>  | <b>Scenario 2 Path</b>                                | <b>Scenario 3 Path</b>   | <b>Scenario 4 Path</b>                                      |
|-------------------------------------|---|---|--|---|
| Verify operational state            | EQP-001: authenticity state   | EQP-004: authorization lifecycle                      | EQP-003: custody chain replay  | EQP-010: decision state replay                              |
| Verify containment was proportional | Break record scope; hold scope; release evidence                              | Gate failure scope; hold scope; supersession evidence | Break scope (single cabinet); hold scope; correction approval          | Override documentation; review posture; PARP                |
| Verify resolution was proper        | Correction EP Delta; manufacturer attestation; post-correction reconciliation | New AES; new prescription; gate re-evaluation         | Correction EP Delta with dual approval; post-correction reconciliation | Decision state preserved; quality review finding documented |
| Access tier used                    | Tier 1 (break investigation)  | Tier 1 (authorization review)                         | Tier 1 (custody investigation)   | Tier 0 (aggregate) + Tier 1 (specific decision states)      |

## AA.10 Break, Containment, and Correction Summary

### Break / Containment / Correction Matrix:

| <b>Scenario</b> | <b>Break Code</b> | <b>Severity</b> | <b>Containment Scope</b> | <b>Resolution</b>             | <b>EP Delta</b>     |
|-----------------|-------------------|-----------------|--------------------------|-------------------------------|---------------------|
| 1               | BRK-PROV-002      | SEV-2           | 50 units (of 3,000)      | Manufacturer correction; hash | Provenance manifest |

| Scenario | Break Code                                    | Severity                      | Containment Scope                    | Resolution   | EP Delta                                   |
|----------|---|-------------------------------|--------------------------------------|--|--|
|          |   |                               |                                      | chain repaired                                       | correction                                 |
| 2        | BRK-AUTH-005 (scope mismatch)                 | SEV-2                         | Single refill event                  | Prescriber transfer; new authorization               | Supersession (original → new prescription) |
| 3        | BRK-CUST-004                                  | SEV-2                         | Single product at single cabinet     | Retroactive custody event; dual-authority correction | CES correction with approval chain         |
| 4        | BRK-SAFE-003 (override without documentation) | N/A (override was documented) | N/A (no break; proper documentation) | Quality review confirms adequacy                     | N/A (no correction needed)                 |

## AA.11 Practical Benefit Realization by Stakeholder Type

### Stakeholder Benefit Matrix:

| Stakeholder                | Primary Benefit  | Evidence of Benefit   |
|----------------------------|--|---|
| Patient                    | Receives authenticated product via authorized pathway with documented safety evidence; not denied due to unnecessary holds | Proportional containment scope; dispensation proceeds when evidence supports    |
| Pharmacist / dispenser     | Clear gate logic; documented authority to dispense or hold; protection from unauthorized dispensation liability            | DEP-H with complete gate results; accountability insert                         |
| Prescriber                 | Credential issues detected before patient impact; structured override documentation protects clinical autonomy             | AES lifecycle; DS-05 preservation; decision state record                        |
| Hospital / institution     | Controlled substance accountability; clinical decision audit readiness; reduced examination burden                         | Custody chain evidence; decision state replay; standardized evidence packs      |
| Distributor / manufacturer | Proportional containment (not entire shipment quarantine for isolated break); faster resolution                            | PAES per product unit; correction EP Delta with manufacturer attestation        |
| Examiner / auditor         | Standardized query families; tiered access; evidence integrity verification; SLO-bounded retrieval                         | Evidence packs per Appendix B; query pack per Appendix E; SLOs per Appendix T/Z |
| Benefit administrator      | Evidence-linked claim gating; temporal assessment; dispute-resilient payout controls                                       | CLM-EP with gate results; temporal assessment record; open breaks register      |
| Governance body            | Clear accountability (RACI); materiality triggers; structured escalation; no-master-key posture                            | Accountability inserts; governance records; recertification evidence            |

## AA.12 Minimal Adoption Pathways

### Minimal Adoption Pathway Table:

| <b>Adoption Level</b>      | <b>Components Implemented</b>   | <b>Benefit Achieved</b>  | <b>Prerequisite</b>                         |
|----------------------------|---|--|---|
| Level 1: Product identity  | CPO registration; PAES generation; basic provenance manifest              | Product authenticity verification at receipt; counterfeit detection capability     | Product registration in framework           |
| Level 2: + Authorization   | AES generation; prescription lifecycle tracking; dispensation gates G1–G2 | Authorization verification at dispensation; expired/revoked prescription detection | Level 1 + issuer credential integration     |
| Level 3: + Custody         | CES generation; custody event logging; gates G3–G4                        | Custody chain integrity; storage condition monitoring; handoff verification        | Level 2 + custody event instrumentation     |
| Level 4: + Safety          | SES generation; decision state records; gates G5–G6                       | Proof-of-safety documentation; clinical decision replay; override accountability   | Level 3 + clinical system integration       |
| Level 5: + Claims          | CLM-EP; claim gates; temporal assessment                                  | Evidence-linked reimbursement; dispute-resilient payout                            | Level 4 + benefit administrator integration |
| Level 6: + Full governance | Complete reconciliation; tiered access; offboarding; recertification      | Full operational evidence layer with examiner readiness                            | Level 5 + governance implementation         |

## AA.13 Worked Mini-Outputs and Artifact Snapshots

### Worked Output Snapshot Table:

| <b>Artifact</b>                 | <b>Scenario</b> | <b>Key Fields Shown</b>  | <b>Purpose</b>  |
|---------------------------------|-----------------|--|---|
| BRK-PROV-002 detection record   | Scenario 1      | break_id, severity (SEV-2), affected_units (50), chain_break_position (packaging stage), detection_timestamp   | Shows how provenance break is captured and scoped                         |
| Gate G2 PENDED result           | Scenario 2      | gate_id (G2), result (PENDED), reason (ISSUER_CREDENTIAL_UPDATE_AMBIGUOUS), dispensation_event_ref   | Shows how ambiguous credential update blocks dispensation appropriately   |
| Correction EP Delta for custody | Scenario 3      | delta_id, previous_state (22 units at cabinet), new_state (20 at cabinet + 2 at emergency kit), correction_authority (pharmacy_director + nursing_supervisor), approval_timestamps | Shows non-destructive correction with dual-authority approval             |
| Context-bound decision state    | Scenario 4      | decision_id, override_flag (true), algorithm_version (CDSS-v4.2), DS-05 rationale summary, review_posture (EXCEPTIONAL)  | Shows how clinical decision context is preserved for reviewer-safe replay |

## AA.14 Reader Action Map

### Reader Action Map:

| <b>Reader Profile</b>            | <b>Start Here</b> | <b>Key Tables</b>                                 | <b>Primary Actions</b>                              |
|----------------------------------|-------------------|---|---|
| Executive / sponsor              | AA.7, AA.8        | Cross-Scenario Benefit Matrix; Before/After Table | Understand practical value proposition              |
| Implementer                      | AA.12             | Minimal Adoption Pathway Table                    | Plan phased implementation                          |
| Operator (pharmacy, distributor) | AA.3–AA.6         | Scenario Workflow Tables                          | Understand operational impact of framework adoption |
| Examiner / auditor               | AA.9              | Reviewer Walkthrough Matrix                       | Understand verification approach across scenarios   |
| Governance body                  | AA.11             | Stakeholder Benefit Matrix                        | Assess benefit distribution; justify investment     |

# Appendix AB — Minimal Institution Adoption Blueprint and Phased Implementation Path for Product Authenticity, Authorization, Custody, Proof-of-Safety, and Bounded Review Workflows

## AB.0 Purpose and Reader Orientation

*"The full framework need not be adopted all at once to produce meaningful operational benefit. Institutions can realize material improvements through a phased implementation path that begins with minimum viable authenticity, authorization, custody, and evidence controls, then progressively adds bounded verification, correction discipline, portability, resilience, and optional financially consequential workflows."*

This appendix provides an operational blueprint for phased adoption. It exists because the full framework — Sections 0–15 and Appendices A–AA — defines a comprehensive target architecture. No institution can or should implement every control simultaneously. Phased adoption sequences implementation to maximize early benefit while preserving architectural coherence and avoiding governance gaps.

*"The objective of phased adoption is not to dilute the target architecture, but to sequence implementation in a way that preserves evidentiary integrity, reviewer usability, governance discipline, and reversibility while reducing operational disruption and premature complexity."*

**What this appendix is:** A phased operating blueprint for incremental adoption, with dependency logic, transition gates, minimum control sets, and governance-by-phase.

**What this appendix is not:** A vendor implementation plan, budget memo, procurement roadmap, staffing model, or generic digital-transformation playbook.

## AB.1 Adoption Design Principles

### Adoption Design Principles Table:

| Principle                              | Operational Meaning  | Anti-Pattern It Prevents                                    |
|--|--|---|
| Minimum viable control first           | Begin with the smallest control set that produces verifiable evidence and hold-only containment capability | Scope overload; "boil the ocean" implementation paralysis   |
| Evidence before automation             | Generate evidence artifacts (ILS, content-addressed records) before automating decision gates              | Automated decisions on unverifiable inputs; opaque trust    |
| Bounded review before broad disclosure | Implement tiered access and purpose limitation before expanding evidence access scope                      | Pervasive disclosure; surveillance creep; privacy violation |
| Preservation before                    | Implement non-destructive EP Delta discipline  | Silent overwrites; lost audit                               |

| <b>Principle</b>                   | <b>Operational Meaning</b>  | <b>Anti-Pattern It Prevents</b>                           |
|------------------------------------|---|---|
| destructive correction             | before any correction capability  | trails; governance violations                             |
| Phased governance before scale     | Establish minimal governance (approval chains, RACI, change control) before expanding participant count or transaction volume | Ungoverned scale; accountability gaps; incident paralysis |
| Reversibility from the start       | Design offboarding and legacy compatibility into Phase 1; do not defer to later phases  | Lock-in; lossy migration; inability to exit the framework |
| No big-bang dependency             | Each phase produces standalone benefit; no phase requires completion of all prior controls                                    | All-or-nothing risk; delayed benefit realization          |
| Additive layering, not replacement | Each phase adds capability to the prior phase; no phase replaces or invalidates prior work                                    | Rework; sunk cost; architectural inconsistency            |

## AB.2 Institutional Starting Point Taxonomy

Institutions enter the framework from different operational maturity states. This taxonomy helps institutions identify their starting position and select the appropriate entry path.

### Institutional Starting Point Taxonomy Table:

| <b>Starting Point</b>                | <b>Code</b> | <b>Characteristics</b>  | <b>Typical Entry Phase</b>                                | <b>Key Gap</b>  |
|--------------------------------------|-------------|---|---|---|
| Low-structure legacy                 | SP-LOW      | Paper-based or ad-hoc digital records; no content addressing; no standardized evidence; no formal reconciliation  | Phase 1 (full minimum viable set)                         | Everything — evidence generation, custody logging, governance structure           |
| Partially controlled digital         | SP-PART     | Some digital tracking (e.g., electronic prescribing, barcode scanning) but no content-addressed evidence; inconsistent logging; limited reconciliation        | Phase 1 (accelerated — some capabilities already present) | Content addressing; evidence integrity; reconciliation discipline; bounded review |
| High-control but fragmented          | SP-FRAG     | Strong controls in individual domains (e.g., good pharmacy systems, good warehouse management) but no cross-domain evidence linkage or unified reconciliation | Phase 2 entry (some Phase 1 controls already met)         | Cross-domain evidence linkage; unified reconciliation; reviewer-safe outputs      |
| Bounded-review-capable, weak custody | SP-BREV     | Good access controls and reviewer discipline (e.g., tiered access, audit logging) but weak physical custody chain evidence                                    | Phase 1 for custody; Phase 3 entry for reviewer controls  | Custody event logging; provenance chain; storage condition monitoring             |

| Starting Point                                 | Code   | Characteristics   | Typical Entry Phase  | Key Gap   |
|--|--------|---|--|---|
| Financially consequential workflow environment | SP-FIN | Claims and reimbursement systems operational but not evidence-linked to upstream product, authorization, or safety states | Phase 2–3 for core controls; Phase 4 for financial integration | Evidence linkage between claims and upstream domains; temporal assessment |

**Entry Path Guidance:** Institutions assess their starting point, identify which Phase 1 controls they already satisfy, and focus Phase 1 implementation on remaining gaps. No institution is required to start from zero — existing capabilities are credited where they meet the evidence and governance requirements of the applicable phase.

### AB.3 Minimum Viable Control Set (Phase 1)

Phase 1 defines the minimum set of controls that produce meaningful operational benefit: verifiable product identity, basic authorization checking, minimal custody logging, hold-only containment capability, and evidence generation.

#### Minimum Viable Control Set Matrix:

| Control Domain       | Phase 1 Minimum  | Evidence Artifact   | Reviewer Capability                               | What Phase 1 Cannot Do   |
|----------------------|--|---|---|--|
| Product authenticity | CPO registration for products in scope; basic manufacturer identity reference                          | CPO record (content-addressed); PAES (partial — CPO + manufacturer reference) | Product identity verification query               | Full provenance chain replay; aggregation hierarchy traversal; cross-batch analysis          |
| Provenance           | Basic provenance linkage: manufacturer release → receipt at institution; not full multi-node chain     | Provenance manifest (2-node: origin → institution)                            | Origin verification query                         | Multi-hop provenance replay; repackaging tracking; storage condition chain                   |
| Authorization        | AES generation at dispensation; issuer legitimacy check (current credential status); basic scope match | AES record with credential reference and revocation check result              | Authorization validity query at dispensation time | Supersession chain management; delegation chain verification; freshness-window enforcement   |
| Custody              | Minimum custody event logging: CUS_RECEIPT, CUS_DISPENSATION, CUS_HOLD_ENTRY, CUS_HOLD_RELEASE         | ILS records for logged custody events; CES (partial)                          | Basic custody event query                         | Full chain replay; storage condition monitoring; excursion management; handoff pair matching |

| <b>Control Domain</b> | <b>Phase 1 Minimum</b>   | <b>Evidence Artifact</b>                               | <b>Reviewer Capability</b>                           | <b>What Phase 1 Cannot Do</b>  |
|-----------------------|--|--|--|--|
| Hold-only containment | Hold-only capability for products with evidence concerns; basic hold-set record  | CUS_HOLD_ENTRY / CUS_HOLD_RELEASE records              | Hold inventory query                                 | Automated hold triggers; severity-based containment; preservation bundle generation                    |
| Evidence generation   | Minimal evidence pack: PAES (partial), AES, custody ILS records; content-addressed manifest for generated artifacts    | Evidence pack manifest (content-addressed)             | Basic evidence retrieval                             | Full evidence pack per Appendix B templates; cross-domain linkage; reconciliation reports              |
| Governance            | Minimal approval chain: dual authorization for holds and corrections; basic RACI for core activities                   | Approval chain records; RACI documentation             | Governance structure query                           | Full governance body structure; change control board; recertification cycles; material change triggers |
| Preservation          | Basic preservation: content-addressed storage for generated artifacts; no deletion of evidence during retention period | Content-addressed artifact inventory                   | Artifact integrity verification                      | Full preservation bundles; legal hold capability; incident-specific preservation                       |
| Reviewer output       | Basic reviewer-safe output: query-safe views for product identity, authorization status, and hold inventory            | Tier 0 aggregate reports; basic Tier 1 scoped extracts | Basic examiner queries (EQP-001, EQP-004 simplified) | Full minimal disclosure profiles; VOP capability; post-access review; PARP                             |

**Phase 1 Operational Benefits:**

- Product authenticity verification at receipt (counterfeit detection capability).
- Authorization verification at dispensation (expired/revoked prescription detection).
- Hold-only containment for evidence concerns (proportional response).
- Basic evidence trail for examiner queries (evidence-backed answers vs. assertions).
- Preservation of generated evidence (no evidence loss).

**Phase 1 Limitations (Accepted):**

- No full provenance chain replay beyond origin → institution.
- No automated reconciliation or break detection.
- No supersession chain management.
- No storage condition monitoring integration.
- No claim/reimbursement evidence linkage.
- No cross-domain portability.
- Limited reviewer access governance (basic Tier 0/1 only).

## AB.4 Controlled Operational Expansion (Phase 2)

Phase 2 adds reconciliation, stronger custody continuity, correction discipline, and more mature evidence linkage. It builds on Phase 1 controls without replacing them.

### Phase 2 Expansion Matrix:

| Control Domain            | Phase 2 Addition   | New Evidence Artifacts  | New Reviewer Capability  | Transition Dependency                                   |
|---------------------------|--|---|--|---|
| Provenance                | Multi-node provenance chain; hash-chained event linkage; handoff pair matching                           | Full provenance manifest (content-addressed, hash-chained)                        | Provenance chain replay (EQP-003)  | Phase 1 CPO and basic provenance in place               |
| Custody                   | Full custody event taxonomy (Section 6.1); storage condition logging; excursion detection and assessment | Complete CES; storage condition logs; excursion records                           | Full custody chain replay; excursion history                                     | Phase 1 custody logging operational                     |
| Reconciliation            | Scheduled reconciliation for provenance-custody alignment and authorization-dispensation alignment       | Reconciliation execution reports; break detection records                         | Break inventory queries (EQP-012); reconciliation cadence verification (EQP-014) | Phase 1 evidence artifacts available for reconciliation |
| Break management          | Break taxonomy (Appendix C) applied; severity classification; containment per severity                   | Break lifecycle records (DETECTED → CONTAINED → INVESTIGATED → RESOLVED → CLOSED) | Break lifecycle queries; trend analysis (EQP-013)                                | Reconciliation operational (this phase)                 |
| Correction / supersession | EP Delta discipline for all corrections; non-destructive preservation; basic supersession chains         | EP Delta records; version lineage records   | Authorization lifecycle replay (EQP-004); version history queries                | Phase 1 evidence generation; Phase 2 reconciliation     |
| State determination       | Canonical state determination logic (Appendix V); current-reference state vs. historical state           | Canonical state records; supersession chain records                               | Canonical state queries (Appendix V, V.11)                                       | Phase 2 supersession discipline                         |
| Governance                | Change control procedures; recertification cadence (annual minimum); material change trigger             | Change control records; recertification records; material change event records    | Governance compliance queries (GOVN-001, GOVN-002)                               | Phase 1 minimal governance                              |

| Control Domain | Phase 2 Addition  | New Evidence Artifacts                        | New Reviewer Capability            | Transition Dependency                                       |
|----------------|---|---|------------------------------------|---|
|                | documentation   |   |                                    |   |
| Preservation   | Full preservation bundles for SEV-1 and SEV-2 breaks; legal hold capability | Preservation bundles per Appendix F templates | PB retrieval; legal hold inventory | Phase 1 content-addressed storage; Phase 2 break management |

**Phase 1 → Phase 2 Transition Criteria:**

| Criterion                       | Minimum Threshold  | Evidence   |
|---------------------------------|--|--|
| Phase 1 controls operational    | All Phase 1 minimum controls implemented and generating evidence                             | Phase 1 control inventory with evidence artifact samples |
| Evidence generation consistent  | ≥95% of dispensation events have associated PAES and AES records                             | Evidence coverage report                                 |
| Hold-only capability tested     | At least one hold-only exercise completed successfully (live or tabletop)                    | Hold exercise record with results                        |
| Preservation baseline met       | Content-addressed storage operational; no evidence artifacts deleted during retention period | Storage integrity verification report                    |
| Governance minimum met          | Dual-authorization for holds and corrections operational; basic RACI documented              | Approval chain samples; RACI document                    |
| Governance approval for Phase 2 | Governance body approves Phase 2 expansion   | Governance approval record                               |

**AB.5 Reviewer and Examiner Readiness Buildout (Phase 3)**

Phase 3 transforms the institution from "digitally tracked" to "reviewer-ready" — meaning an examiner can independently verify operational states through standardized evidence, bounded access, and replay capability.

**Phase 3 Reviewer / Examiner Readiness Matrix:**

| Capability                  | Phase 3 Addition   | Evidence  | Readiness Indicator   |
|-----------------------------|--|---|---|
| Minimal disclosure profiles | Tier 0/1/2 disclosure profiles per Appendix X; pseudonymization at Tier 1; full identity only at Tier 2                      | Disclosure profile configuration; sample outputs per tier                     | Examiner receives appropriate detail per tier; no over-disclosure       |
| Query-safe evidence views   | Pre-defined evidence views (Appendix X, X.4) for product, authorization, custody, safety, dispensation, claims               | View definitions; sample query results  | Examiner queries return structured, scoped results — not raw data dumps |
| Reviewer-safe replay        | Complete replay capability for product authenticity, authorization lifecycle, custody chain, and dispensation reconstruction | Replay execution records; sample replay outputs per replay type (Section 9.9) | Examiner can reconstruct any operational state at any historical point  |
| Post-access review          | PARP discipline for all Tier 2   | PARP records; scope   | Every Tier 2 access   |

| Capability                  | Phase 3 Addition  | Evidence   | Readiness Indicator  |
|-----------------------------|---|--|--|
|                             | access and selected Tier 1 access; independent reviewer verification of scope compliance  | verification documentation                           | event has completed PARP within SLA  |
| Standard checks pack        | Full checks pack (Appendix D) implemented and executable  | Check execution records; pass/fail results per check | ≥90% of applicable checks executable; failures documented with remediation |
| Examiner query pack         | Full query pack (Appendix E) adapted to institutional retrieval infrastructure  | Query execution samples; result format documentation | Examiner queries produce consistent, complete, integrity-verified results  |
| Evidence retrieval SLOs     | Retrieval SLOs operational per Appendix T   | SLO compliance records                               | Standard queries responded within 48 hours; emergency within 4 hours       |
| Safety evidence integration | Full SES with product-level and decision-level evidence classes; context-bound decision state records for high-impact decisions | SES manifests; decision state records                | Safety evidence replay capability for sampled decisions                    |
| Dispensation gate maturity  | All 7 gates (G1–G7) operational with automated evaluation   | Gate completion records for all dispensation events  | 100% of dispensation events have complete gate results                     |

**Phase 2 → Phase 3 Transition Criteria:**

| Criterion                      | Minimum Threshold   | Evidence   |
|--------------------------------|---|--|
| Reconciliation operational     | All scheduled reconciliation types executing on cadence; break lifecycle operational    | Reconciliation execution log; break inventory (may have open breaks)     |
| Correction discipline proven   | ≥10 corrections processed through EP Delta discipline with non-destructive preservation | EP Delta samples; version lineage demonstrations                         |
| Supersession chains functional | Supersession chain management operational for authorizations                            | Supersession chain samples; canonical state determination demonstrations |
| Preservation bundles tested    | At least 2 preservation bundles generated (live incident or exercise)                   | PB samples with completeness verification                                |
| Governance maturity            | Change control operational; at least 1 recertification cycle completed                  | Change control records; recertification report                           |
| Governance approval            | Governance body approves Phase 3 buildout   | Governance approval record   |

## AB.6 Advanced Institutionalization and Cross-Domain Readiness (Phase 4)

Phase 4 addresses capabilities that require mature underlying controls: cross-domain portability, conflict-of-process handling, resilience under stress, mature offboarding, and optional financial workflow integration.

### Phase 4 Advanced Institutionalization Matrix:

| Capability                    | Phase 4 Addition  | Dependency  | When to Adopt  |
|-------------------------------|---|---|--|
| Cross-domain portability      | Evidence transfer between institutions or jurisdictions per Appendix Y; equivalence assessment; destination rebinding | Phase 3 reviewer readiness (evidence must be reviewer-safe before it is portable) | When institution participates in multi-entity or multi-jurisdiction workflows    |
| Conflict-of-process handling  | COP taxonomy (Appendix Y, Y.4); format/standard/authority/retention/disclosure conflict resolution                    | Phase 3 (requires mature evidence generation and bounded review)                  | When institution receives foreign-origin products or cross-border authorizations |
| Resilience and degraded modes | Degraded mode logic (Appendix Z); backpressure management; evidence continuity under stress                           | Phase 2 (requires reconciliation and break management as baseline)                | When institution operates at scale or in critical-care settings                  |
| Mature offboarding            | Full offboarding proof bundle (Appendix I); final reconciliation; open breaks disclosure; legacy transition manifest  | Phase 3 (requires reviewer-ready evidence and preservation bundles)               | Before any system transition, pilot conclusion, or participant exit              |
| Optional financial workflows  | Section 12 controls; Appendix W claim gates; temporal assessment; adjustment/reversal discipline                      | Phase 3 (requires mature authorization, custody, and safety evidence)             | Only when claim/reimbursement evidence linkage is in institutional scope         |
| Adversarial failure detection | Appendix U adversarial patterns; detection logic; containment for intentional abuse                                   | Phase 2 (requires reconciliation and basic incident response)                     | When institution faces elevated counterfeit, diversion, or fraud risk            |
| Advanced state governance     | Full canonical state management (Appendix V); conflict resolution; parallel-state handling                            | Phase 3 (requires supersession chains and reviewer replay)                        | When institution manages complex authorization or product state environments     |

**Phase 4 is not a prerequisite for operational benefit.** Phases 1–3 produce substantial, standalone value. Phase 4 capabilities are adopted when the institution's operational context requires them — not as a mandatory destination.

## AB.7 Dependency and Sequencing Logic

### Dependency and Sequencing Matrix:

| Capability                      | Depends On   | Must Precede  | Invalid Without   |
|---------------------------------|--|---|---|
| CPO registration                | Nothing (foundational)                               | All provenance, authenticity, and custody controls        | Product identity — framework cannot operate without CPO                 |
| Basic provenance                | CPO  | Multi-node provenance; reconciliation                     | Product reference anchor  |
| AES generation                  | Nothing (foundational)                               | Dispensation gates; supersession chains                   | Authorization evidence — dispensation cannot be verified                |
| Custody event logging           | CPO (product reference)                              | Reconciliation; full chain replay; dispensation gates     | Product identity for custody event linkage                              |
| Hold-only containment           | Custody event logging (to identify what to hold)     | Break management; recall workflows                        | Evidence of what is held and why  |
| Content-addressed storage       | Nothing (infrastructure)                             | All evidence integrity verification; preservation bundles | Tamper detection — evidence integrity unverifiable                      |
| Reconciliation                  | Phase 1 evidence (PAES, AES, CES)                    | Break management; correction discipline                   | Evidence artifacts to reconcile   |
| EP Delta discipline             | Content-addressed storage; governance approval chain | Supersession chains; correction workflows                 | Non-destructive preservation — corrections destroy prior state          |
| Preservation bundles            | Content-addressed storage; break management          | Legal hold; incident investigation; offboarding           | Evidence collection for incidents                                       |
| Tiered reviewer access          | Evidence generation (something to access)            | Minimal disclosure profiles; PARP                         | Evidence — access controls without evidence are vacuous                 |
| Dispensation gates (full G1–G7) | PAES, AES, CES, SES all operational                  | Reviewer-ready dispensation verification                  | Upstream evidence sets — gates cannot evaluate absent evidence          |
| Claim evidence linkage          | Dispensation gates; PAES, AES, CES, SES              | Claim gates (CG-1–CG-6); temporal assessment              | Upstream evidence chain — claims cannot be evidence-linked without it   |
| Cross-domain portability        | Phase 3 reviewer readiness                           | Nothing (terminal capability)                             | Reviewer-safe evidence — non-reviewable evidence is not safely portable |

### Invalid Adoption Shortcuts (High-Risk):

| Shortcut                                 | Risk   | Why It Fails  |
|--|--|---|
| Claim processing before custody evidence | Claims approved without custody chain verification | BRK-FIN-001: claims without dispensation evidence; undetectable |

| Shortcut                                   | Risk   | Why It Fails  |
|--|--|---|
|  |  | diversion   |
| Automated gates before evidence generation | Gates evaluate absent or unreliable evidence                     | False PASS results; dispensation proceeds on unverified states    |
| Correction before preservation             | Corrections overwrite prior states                               | Lost audit trail; silent overwrites (LT-07); governance violation |
| Portability before bounded review          | Foreign evidence imported without disclosure controls            | Over-disclosure; privacy violation; uncontrolled data export      |
| Full scale before governance               | High-volume operations without approval chains or change control | Ungoverned exceptions; accountability gaps; incident paralysis    |

## AB.8 Phase Transition Gates and Approval Criteria

### Phase Transition Gate Matrix:

| Transition        | Gate Criteria   | Evidence Required   | Blocking Conditions   | Approval Authority   |
|-------------------|---|---|---|--|
| Entry → Phase 1   | Institutional decision to adopt; governance sponsor identified; infrastructure for content-addressed storage available                | Governance sponsor designation; infrastructure readiness assessment | None — any institution can begin Phase 1  | Institutional leadership                                       |
| Phase 1 → Phase 2 | Phase 1 controls generating evidence consistently; hold-only tested; preservation baseline met; governance minimum established        | Per AB.4 transition criteria table                                  | Unresolved evidence generation gaps >5% of events; no hold-only test; governance structure absent           | Governance body (or sponsor if governance body not yet formed) |
| Phase 2 → Phase 3 | Reconciliation operational; correction discipline proven; supersession functional; preservation bundles tested; change control active | Per AB.5 transition criteria table                                  | Reconciliation not executing on cadence; no EP Delta evidence; no preservation bundle generated             | Governance body  |
| Phase 3 → Phase 4 | Full reviewer readiness; all dispensation gates operational; checks pack executable; query pack adapted; retrieval SLOs met           | Phase 3 readiness indicators per AB.5 matrix                        | Checks pack <90% executable; query pack not adapted; retrieval SLO not met; PARP discipline not operational | Governance body with examiner readiness attestation            |

### Rollback and Pause Conditions:

| Condition   | Response   |
|---|--|
| Evidence generation rate drops below threshold during phase expansion | Pause expansion; investigate root cause; remediate before proceeding |
| SEV-1 break detected attributable to phase                            | Pause transition; containment per Appendix C;                        |

| Condition   | Response   |
|---|--|
| transition activity   | investigate; governance review before resuming   |
| Governance body determines phase expansion is premature             | Pause or rollback to prior phase; document rationale; define remediation conditions    |
| Integrity failure (BRK-INTEG) detected in newly implemented control | Immediately contain affected scope; investigate; restore valid state before proceeding |

## AB.9 Minimal Roles, RACI, and Governance-by-Phase

### Minimal Roles and RACI-by-Phase Matrix:

| Role                                   | Phase 1  | Phase 2  | Phase 3  | Phase 4   |
|--|--|--|--|---|
| Governance sponsor                     | Required — individual champion with authority to approve holds and corrections | Required — may evolve into governance body chair                         | Governance body operational; sponsor role transitions to strategic oversight                   | Mature governance body with full committee structure            |
| Evidence operator                      | Required — staff generating PAES, AES, custody ILS                             | Expanded — reconciliation execution; break management                    | Expanded — SES generation; decision state records; evidence retrieval                          | Expanded — portability; resilience; financial workflow evidence |
| Custody logger                         | Required — logs CUS_RECEIPT, CUS_DISPENSATION, CUS_HOLD                        | Expanded — full event taxonomy; storage conditions; excursions           | Maintained   | Maintained  |
| Approval authority (holds/corrections) | Required — dual authorization for holds and corrections                        | Expanded — break containment approval; change control participation      | Expanded — Tier 2 access approval; PARP review; recertification                                | Full RACI per Appendix G  |
| Reviewer support                       | Minimal — responds to basic queries  | Expanded — break investigation support; reconciliation report production | Full examiner support function — evidence retrieval; query pack execution; PARP administration | Cross-domain review support; portability evidence coordination  |
| Quality / safety function              | Not required in Phase 1 (but beneficial)                                       | Recommended — excursion assessment; safety alert review                  | Required — SES generation; decision state governance; safety evidence refresh                  | Required — adversarial pattern detection; resilience monitoring |

### Phase 1 Minimum Governance Structure:

- One governance sponsor with dual-authorization partner for holds and corrections.
- Documented RACI for: product registration, custody logging, hold placement, hold release, correction approval, evidence preservation.

- No formal governance committee required in Phase 1 — committee structure deferred to Phase 2.

## AB.10 Common Adoption Failure Modes and Mitigations

### Adoption Failure Mode and Mitigation Matrix:

| Failure Mode                           | Description  | Risk   | Mitigation   |
|--|--|--|--|
| Scope overload                         | Attempting to implement all controls simultaneously                                      | Implementation paralysis; no benefit delivered                         | Follow phased adoption; begin with Phase 1 minimum viable set                                      |
| Automation before evidence             | Automating dispensation gates before evidence artifacts are reliably generated           | False PASS/FAIL results; unverified dispensation                       | Phase 1: generate evidence manually or semi-automatically; automate gates only in Phase 2–3        |
| Weak custody before financial          | Integrating claim/reimbursement workflows before custody chain evidence is reliable      | Claims approved without custody verification; financial exposure       | Defer financial workflows to Phase 4; require Phase 3 custody maturity                             |
| Broad disclosure before bounded review | Expanding evidence access without tiered access, purpose limitation, or PARP             | Privacy violation; surveillance creep; regulatory exposure             | Implement bounded review discipline (Phase 3) before expanding access scope                        |
| No preservation before correction      | Implementing correction capability without non-destructive EP Delta discipline           | Silent overwrites; lost audit trails; LT-07 violations                 | Implement content-addressed storage and EP Delta discipline in Phase 2 before enabling corrections |
| No phase-exit criteria                 | Moving to next phase without verifying prior phase maturity                              | Accumulated gaps; fragile architecture; hidden governance debt         | Enforce phase transition gates (AB.8) with documented evidence                                     |
| Portability too early                  | Attempting cross-border or cross-institution evidence transfer before reviewer readiness | Non-reviewable evidence exported; disclosure conflicts; integrity gaps | Defer portability to Phase 4; require Phase 3 reviewer readiness                                   |
| Big-bang migration                     | Replacing all legacy systems simultaneously instead of layering framework controls       | Operational disruption; data loss; rollback difficulty                 | Additive layering; framework operates alongside legacy; offboarding-ready from Phase 1             |

## AB.11 Worked Adoption Patterns

### Worked Adoption Pattern Table:

| Pattern  | Starting Point | Phase 1 Focus | Phase 2 Focus      | Phase 3 Focus   | Phase 4 (If Applicable) |
|----------|----------------|---------------|--------------------|-----------------|-------------------------|
| Hospital | SP-PART        | CPO           | Full custody event | SES integration | Optional: claim         |

| Pattern                        | Starting Point   | Phase 1 Focus  | Phase 2 Focus  | Phase 3 Focus   | Phase 4 (If Applicable)   |
|--------------------------------|--|--|--|---|---|
| pharmacy group                 | (electronic prescribing exists; barcode scanning at receipt)             | registration; AES generation leveraging existing e-prescribing; custody logging at dispensing cabinets; basic hold-only                        | taxonomy; reconciliation (authorization-dispensation alignment); EP Delta discipline for prescription corrections                        | with existing CDSS; decision state records for overrides; full dispensation gates; examiner query pack                    | evidence linkage to existing billing system   |
| Regional distributor           | SP-LOW (paper-based shipping records; no content addressing)             | CPO verification at receipt; basic provenance (manufacturer → distributor); custody logging for receipt and handoff; content-addressed storage | Multi-node provenance chain (manufacturer → distributor → customers); storage condition monitoring; excursion management; reconciliation | Reviewer-safe outputs for product integrity queries; full checks pack for provenance and custody; examiner retrieval SLOs | Cross-domain portability for multi-jurisdiction distribution  |
| Multi-site health system       | SP-FRAG (strong individual site systems; no cross-site evidence linkage) | Unified CPO registry across sites; standardized AES format; custody logging harmonized across sites  | Cross-site reconciliation; break management across sites; supersession chain management for prescriptions spanning sites                 | Unified reviewer access across sites; standardized query pack; centralized PARP administration                            | Cross-domain portability between sites and external partners; resilience / degraded mode governance |
| Specialty pharmacy with claims | SP-FIN (claims system operational; upstream evidence weak)               | Product authenticity at receipt; authorization verification; custody logging   | Full custody chain; safety evidence integration; dispensation gates  | Reviewer-ready evidence for claim support; temporal assessment capability   | Claim evidence gates (CG-1–CG-6); temporal assessment; adjustment/reversal discipline               |

## AB.12 Reader Action Map

### Reader Action Map:

| <b>Starting State</b>               | <b>Phase 1 Priority</b>  | <b>Next Control Layer</b>   | <b>Transition Gate</b>  | <b>Expected Benefit</b>   |
|-------------------------------------|--|---|---|---|
| SP-LOW (low structure)              | CPO + basic provenance + AES + custody logging + hold-only + content-addressed storage             | Reconciliation + EP Delta + preservation                                      | Phase 1 controls generating evidence ≥95%; hold tested; governance sponsor active | Counterfeit detection; authorization verification; basic audit trail          |
| SP-PART (partial digital)           | Gap-fill: add content addressing to existing digital records; add AES where missing; add hold-only | Full custody taxonomy + reconciliation + break management                     | Same as above, accelerated  | Upgrade from tracking to evidence; break detection; proportional containment  |
| SP-FRAG (fragmented)                | Unify CPO across domains; standardize evidence format; harmonize custody logging                   | Cross-domain reconciliation + supersession + state determination              | Reconciliation executing; corrections via EP Delta proven                         | Cross-domain consistency; unified break detection; version control            |
| SP-BREV (good review, weak custody) | Custody event logging; provenance chain; storage conditions  | Reconciliation + dispensation gates (leverage existing review infrastructure) | Custody chain operational; reconciliation running                                 | Evidence-backed review (not just access-controlled review); custody integrity |
| SP-FIN (claims-focused)             | Upstream evidence: product + authorization + custody + safety                                      | Dispensation gates + reviewer readiness + temporal assessment                 | Phase 3 reviewer readiness met; upstream evidence mature                          | Evidence-linked claims; dispute-resilient payout; examiner-ready claim audit  |

# Appendix AC — Control Mapping, Readiness Scoring, and Self-Assessment Pack for Product Authenticity, Authorization, Custody, Proof-of-Safety, and Bounded Review Workflows

## AC.0 Purpose and Reader Orientation

*"A credible operating framework requires more than declared controls. Institutions must be able to map control domains, assess evidence sufficiency, score readiness in a structured way, identify material gaps, and distinguish partial digitalization from reviewer-ready, replay-capable, and governably correctable operation."*

This appendix provides a structured self-assessment pack. It allows institutions to inventory their controls, score readiness across dimensions, identify and prioritize gaps, and determine whether they are prepared for examiner scrutiny, phase transitions, or advanced capabilities.

*"The purpose of readiness scoring is not to compress complex architecture into a single number. It is to create a structured, evidence-backed view of which capabilities are present, which are immature, which are absent, and which gaps materially impair authenticity, authorization, custody, proof-of-safety, bounded verification, or correction readiness."*

**What this appendix is:** An operational self-assessment pack grounded in evidence, control sufficiency, replayability, and reviewer readiness.

**What this appendix is not:** A certification standard, legal compliance opinion, formal accreditation framework, or simplistic maturity model without evidence expectations.

## AC.1 Control Domain Taxonomy

**Control Domain Taxonomy Table:**

| Domain ID | Domain Name                         | Framework Sections    | Key Artifacts                             |
|-----------|-------------------------------------|-----------------------|---|
| CD-01     | Product authenticity                | Sections 3.1, 4       | CPO, PAES                                 |
| CD-02     | Provenance integrity                | Sections 3.2, 4.2–4.6 | Provenance manifest, hash-chained events  |
| CD-03     | Authorization / issuer legitimacy   | Sections 3.3, 5.1–5.5 | AES, issuer credential reference          |
| CD-04     | Prescription / instruction validity | Sections 3.4, 5.4     | Prescription records, supersession chains |
| CD-05     | Chain-of-custody                    | Sections 3.5, 6       | CES, custody event chain, storage logs    |
| CD-06     | Dispensation / release integrity    | Sections 3.6, 6.4     | DEP-H, gate completion records            |
| CD-07     | Proof-of-safety evidence            | Sections 3.7, 7       | SES, decision state records               |
| CD-08     | Recall / quarantine /               | Sections 3.8, 3.9, 8  | Recall records, EP Deltas, hold-set       |

| Domain ID | Domain Name                      | Framework Sections        | Key Artifacts                                   |
|-----------|----------------------------------|---------------------------|---|
|           | correction                       |                           | records   |
| CD-09     | Bounded reviewer outputs         | Sections 10, Appendix X   | Tiered access records, PARP, query results      |
| CD-10     | Replay and reconstruction        | Section 9.9, Appendix E   | Replay execution records                        |
| CD-11     | Governance and approval controls | Section 11                | RACI, change control, recertification records   |
| CD-12     | Offboarding and portability      | Section 13, Appendix I, Y | Offboarding proof bundle, portability records   |
| CD-13     | Financial workflows (optional)   | Section 12, Appendix W    | CLM-EP, claim gate results, temporal assessment |

## AC.2 Readiness Dimension Framework

Readiness is multi-dimensional. A control domain may be present but not evidence-backed, or evidence-backed but not replayable, or replayable but not reviewer-ready. The following dimensions capture this complexity.

### Readiness Dimension Matrix:

| Dimension ID | Dimension Name              | Definition  | Assessment Question  |
|--------------|-----------------------------|---|--|
| RD-01        | Control existence           | Is the control implemented and operational?   | "Does this control execute in the operational environment?"                        |
| RD-02        | Evidence sufficiency        | Does the control produce content-addressed, integrity-verified evidence artifacts?                        | "Can I retrieve a content-addressed artifact proving this control executed?"       |
| RD-03        | Replayability               | Can the control's execution and outcome be reconstructed at a historical point?                           | "Can I replay what happened on [date] for [subject] from stored evidence?"         |
| RD-04        | Governance sufficiency      | Is the control governed by documented approval chains, RACI, and change control?                          | "Who approved this action, under what authority, and is that approval documented?" |
| RD-05        | Reviewer readiness          | Can an examiner independently verify this control through bounded access with purpose limitation and TTL? | "Can an examiner verify this control within 48 hours using standardized queries?"  |
| RD-06        | Bounded disclosure maturity | Does evidence access follow tiered access with pseudonymization, minimization, and post-access review?    | "Is evidence disclosed at the minimum level necessary for the documented purpose?" |
| RD-07        | Correction maturity         | Are corrections processed through EP Delta discipline with non-destructive preservation?                  | "Is the prior state preserved when a correction is applied?"                       |
| RD-08        | Portability                 | Can evidence be transferred to  | "Can this evidence be exported   |

| Dimension ID | Dimension Name      | Definition   | Assessment Question   |
|--------------|---------------------|--|---|
|              | readiness           | another system or jurisdiction with integrity preservation and documented handoff? | with content-addressed integrity to a receiving system?"                  |
| RD-09        | Resilience maturity | Does the control operate under degraded conditions with evidence continuity?       | "What happens to this control if [component] is unavailable for 4 hours?" |

### AC.3 Scoring Model and Maturity Bands

#### Scoring Model and Maturity Band Table:

| Score | Band Label                   | Definition   | Operational Indicator  |
|-------|------------------------------|--|--|
| 0     | Absent                       | Control not implemented; no evidence generated; no governance  | No artifact, no process, no documentation  |
| 1     | Ad hoc / fragmented          | Control exists informally or inconsistently; evidence is paper-based or non-standardized; no content addressing  | Some activity occurs but evidence is non-replayable, non-verifiable, and inconsistently produced   |
| 2     | Partial / non-replayable     | Control implemented with digital records but without content-addressed integrity, consistent logging, or reconciliation  | Digital records exist but cannot be independently verified; no hash chain; no reconciliation   |
| 3     | Controlled but limited       | Control produces content-addressed evidence; basic reconciliation operational; governance documented; but limited replay capability and limited reviewer access discipline                       | Evidence artifacts retrievable and integrity-verifiable; reconciliation detects breaks; but examiner cannot independently replay or perform bounded verification |
| 4     | Reviewer-ready               | Full evidence production with content addressing; reconciliation on cadence; EP Delta discipline; tiered reviewer access with purpose limitation; checks pack executable; query results reliable | Examiner can independently verify operational states; replay historical states; verify corrections were non-destructive; access evidence within SLO              |
| 5     | Mature / scalable / portable | All Score 4 capabilities plus: cross-domain portability; resilience under stress; adversarial pattern detection; offboarding proof bundles; optional financial workflow integration              | Evidence portable across jurisdictions or institutions; system operates under degraded conditions; offboarding can be completed without evidence loss            |

#### Scoring Conventions:

- Scores are assigned per control domain (CD-01 through CD-13) per readiness dimension (RD-01 through RD-09).
- A domain's overall score is the minimum across its critical dimensions (not the average) — a domain with Score 4 evidence sufficiency but Score 1 governance sufficiency is governed by its weakest critical dimension.

- Critical dimensions vary by domain; the self-assessment questionnaire (AC.6) identifies which dimensions are critical for each domain.

## AC.4 Evidence Expectations by Score

### Evidence Expectations by Score Matrix:

| Score | Evidence Artifacts Expected   | Governance Visible  | Replay Capable  | Reviewer Output  |
|-------|---|---|---|--|
| 0     | None  | None  | No  | None   |
| 1     | Paper records, screenshots, or ad-hoc digital files; no standardized format; no integrity markers   | Informal approvals (email, verbal)  | No (evidence not structured for replay)                                     | Raw documents only; no standardized query capability   |
| 2     | Digital records in databases or files; structured fields; but no content addressing; no hash chaining   | Documented procedures exist; approval records in system   | Partial (records can be queried but integrity not independently verifiable) | System-generated reports; not examiner-standardized  |
| 3     | Content-addressed artifacts (ILS, manifests); hash-chained event sequences; reconciliation reports; EP Deltas for corrections                 | RACI documented; approval chains in content-addressed records; change control active                | Yes for most operational states; some gaps in historical reconstruction     | Basic query-safe views; Tier 0 aggregate reports; limited Tier 1                               |
| 4     | Full evidence packs per Appendix B templates; preservation bundles per Appendix F; all corrections via EP Delta; checks pack executable       | Full governance per Appendix G RACI; recertification current; material change triggers documented   | Full replay per Section 9.9 requirements; all replay types functional       | Full tiered access; minimal disclosure profiles; PARP operational; examiner queries within SLO |
| 5     | All Score 4 plus: cross-domain portability evidence; equivalence assessments; offboarding proof bundles; resilience evidence; optional CLM-EP | Score 4 plus: cross-domain governance; conflict-of-process handling; adversarial pattern governance | Score 4 plus: replay under stress conditions; cross-domain replay           | Score 4 plus: cross-domain reviewer access; VOP capability; cross-border query handling        |

## AC.5 Gap Taxonomy and Materiality

### Gap Taxonomy and Materiality Table:

| <b>Gap Class</b>                        | <b>Code</b> | <b>Definition</b>  | <b>Materiality</b>  | <b>Impact</b>  |
|---|-------------|--|---|--|
| Absent control                          | GAP-ABS     | Control not implemented in any form  | Blocking (if in Phase 1 minimum set); Material (if in current target phase) | Cannot advance to next phase; operational state unverifiable for this domain             |
| Undocumented control                    | GAP-UNDOC   | Control exists operationally but lacks evidence documentation  | Material  | Examiner cannot verify; replay not possible; governance unverifiable                     |
| Weak evidence                           | GAP-WKEV    | Evidence generated but not content-addressed, not integrity-verified, or not consistently produced                                     | Material  | Evidence may be disputed; tamper detection absent; reconciliation unreliable             |
| Insufficient replayability              | GAP-RPLY    | Evidence exists but historical state reconstruction is not possible (missing version lineage, missing EP Deltas, missing preservation) | Material for reviewer readiness   | Examiner cannot replay; dispute resolution impaired; adverse event investigation limited |
| Stale state dependence                  | GAP-STALE   | Operations proceed on evidence or credentials beyond applicable freshness window without re-verification                               | Material  | Expired evidence may not reflect current conditions; stale authorization may be invalid  |
| Broad disclosure without bounded review | GAP-DISC    | Evidence accessible without tiered access controls, purpose limitation, or TTL   | Material (privacy/compliance risk)  | Over-disclosure; privacy violation; surveillance creep                                   |
| Correction without preservation         | GAP-CORR    | Corrections applied by overwriting prior state; no EP Delta; no version lineage  | Blocking (governance violation)   | Lost audit trail; LT-07 violation; examiner cannot verify correction history             |
| Portability without continuity          | GAP-PORT    | Evidence exported without integrity verification, format documentation, or equivalence assessment                                      | Material (for cross-domain operations)                                      | Imported evidence unreliable; integrity unverifiable at destination                      |
| Financial progression without evidence  | GAP-FIN     | Claims approved or paid without evidence linkage to upstream product, authorization, custody, or safety states                         | Blocking (for financial workflows)  | Claims proceed on unverified states; financial exposure; dispute vulnerability           |

**Materiality Classification:**

| <b>Classification</b> | <b>Definition</b>   | <b>Phase Impact</b>  |
|-----------------------|---|--|
| Blocking              | Gap prevents advancement to target phase or creates governance violation          | Must be remediated before phase transition   |
| Material              | Gap significantly impairs a control domain but does not prevent all operations    | Should be remediated within current phase; documented with risk acceptance if deferred |
| Minor                 | Gap affects efficiency or completeness but does not impair core control integrity | Remediated per improvement cycle; documented   |

## AC.6 Self-Assessment Questionnaire Pack

### Self-Assessment Questionnaire Matrix (Representative — by Domain):

#### CD-01: Product Authenticity:

| <b>Question</b>  | <b>Positive Evidence</b>   | <b>Weak Answer Indicator</b>   | <b>Follow-Up</b>   |
|--|--|--|--|
| Are all products registered with a Canonical Product Object (CPO) before entering the custody chain? | CPO registry with content-addressed records; 100% coverage for products in scope   | "Most products are registered" — implies coverage gaps                             | Quantify coverage percentage; identify unregistered product categories         |
| Is manufacturer identity verified through credential evidence (not assertion alone)?                 | AES with manufacturer credential reference, revocation check, and freshness status | "We trust our suppliers" — no evidence-backed verification                         | Implement AES generation with credential verification at receipt               |
| Can product authenticity be verified at any point by hash chain traversal?                           | Provenance manifest with PASS integrity verification for sampled products          | "We have serial numbers" — serial numbers alone are not content-addressed evidence | Assess whether serial numbers are linked to content-addressed provenance chain |

#### CD-05: Chain-of-Custody:

| <b>Question</b>   | <b>Positive Evidence</b>   | <b>Weak Answer Indicator</b>   | <b>Follow-Up</b>   |
|---|--|--|--|
| Are all custody transitions logged as ILS records with content-addressed integrity? | CES with hash-chained custody events; CUS_RECEIPT and CUS_DISPENSATION logged for all transactions | "We have receiving logs" — may be paper or non-content-addressed         | Assess whether logs are digital, content-addressed, and hash-chained |
| Are storage conditions continuously monitored for condition-sensitive products?     | Storage condition logs with excursion detection records  | "We check temperatures daily" — periodic check vs. continuous monitoring | Assess monitoring granularity vs. product sensitivity requirements   |
| Can the complete  | Custody chain replay   | "We can look up where  | Test historical  |

| Question  | Positive Evidence                  | Weak Answer Indicator                                   | Follow-Up                              |
|---|------------------------------------|---|--|
| custody chain be replayed for any product unit? | demonstration for sampled products | things are" — current state query vs. historical replay | replay capability for sampled products |

**CD-09: Bounded Reviewer Outputs:**

| Question   | Positive Evidence   | Weak Answer Indicator   | Follow-Up   |
|--|---|---|---|
| Is reviewer access governed by tiered access (Tier 0/1/2) with documented purpose codes? | Access event records with tier, purpose code, and TTL; configuration documentation for access tiers | "Reviewers can access the system" — no tiered access; no purpose limitation   | Implement tiered access controls before expanding reviewer access     |
| Are Tier 2 access events subject to dual-control approval and PARP?                      | Tier 2 access records with dual-control approval; completed PARP within SLA                         | "We log who accesses what" — logging without governance is not bounded review | Implement PARP discipline and dual-control for Tier 2                 |
| Can examiner queries be answered within retrieval SLOs using standardized query packs?   | Query execution demonstrations within SLO; results in standardized format                           | "We can pull reports" — ad hoc reporting vs. standardized examiner queries    | Adapt Appendix E query pack to institutional retrieval infrastructure |

**AC.7 Readiness Scoring Worksheets**

**Readiness Scoring Worksheet Template — Product Authenticity and Provenance (CD-01, CD-02):**

| Dimension                     | Score (0–5) | Evidence Cited | Gap Identified | Gap Materiality |
|-------------------------------|-------------|----------------|----------------|-----------------|
| RD-01: Control existence      | ___         | ___            | ___            | ___             |
| RD-02: Evidence sufficiency   | ___         | ___            | ___            | ___             |
| RD-03: Replayability          | ___         | ___            | ___            | ___             |
| RD-04: Governance sufficiency | ___         | ___            | ___            | ___             |
| RD-05: Reviewer readiness     | ___         | ___            | ___            | ___             |
| RD-07: Correction maturity    | ___         | ___            | ___            | ___             |
| <b>Domain minimum score</b>   | ___         |                |                |                 |

Repeat for each domain (CD-03 through CD-13). Critical dimensions vary by domain:

**Critical Dimensions by Domain:**

| Domain                      | Critical Dimensions (Minimum Score Governs) |
|-----------------------------|---|
| CD-01 Product authenticity  | RD-01, RD-02, RD-03                         |
| CD-02 Provenance            | RD-01, RD-02, RD-03                         |
| CD-03 Authorization         | RD-01, RD-02, RD-04                         |
| CD-04 Prescription validity | RD-01, RD-02, RD-07                         |
| CD-05 Custody               | RD-01, RD-02, RD-03                         |
| CD-06 Dispensation          | RD-01, RD-02, RD-04                         |

| <b>Domain</b>                   | <b>Critical Dimensions (Minimum Score Governs)</b> |
|---------------------------------|--|
| CD-07 Safety evidence           | RD-01, RD-02, RD-03, RD-05                         |
| CD-08 Recall / correction       | RD-01, RD-04, RD-07                                |
| CD-09 Bounded review            | RD-01, RD-05, RD-06                                |
| CD-10 Replay                    | RD-03 (primary)                                    |
| CD-11 Governance                | RD-04 (primary)                                    |
| CD-12 Offboarding / portability | RD-08  |
| CD-13 Financial workflows       | RD-01, RD-02, RD-04                                |

## AC.8 Gap Prioritization and Remediation Logic

### Gap Prioritization Matrix:

| <b>Priority</b>              | <b>Gap Characteristics</b>  | <b>Remediation Timing</b>   | <b>Examples</b>   |
|------------------------------|---|---|---|
| P1: Blocking                 | Gap prevents phase advancement or creates active governance violation                                 | Immediate remediation before any expansion                          | GAP-CORR (correction without preservation); GAP-ABS for Phase 1 controls; GAP-FIN if financial workflows active |
| P2: Reviewer-facing          | Gap will be visible to examiner; impairs reviewer confidence or evidence production                   | Remediate within current phase before examiner engagement           | GAP-UNDOC; GAP-WKEV in domains subject to examination; GAP-RPLY for domains with active queries                 |
| P3: Replayability            | Gap impairs historical reconstruction but does not block current operations                           | Remediate within current phase; acceptable to document and schedule | GAP-RPLY for non-critical domains; GAP-STALE for low-risk categories  |
| P4: Governance               | Gap in governance documentation or process maturity; controls operate but governance evidence is weak | Remediate at next recertification cycle                             | GAP-UNDOC for governance structures; missing RACI for non-critical activities                                   |
| P5: Portability / resilience | Gap affects cross-domain or stress-condition capability; relevant only at Phase 4                     | Defer to Phase 4 planning; document in roadmap                      | GAP-PORT; resilience gaps; adversarial detection gaps   |

## AC.9 Reviewer / Examiner Readiness Interpretation

### Reviewer / Examiner Readiness Interpretation Matrix:

| <b>Readiness Level</b> | <b>Minimum Domain Scores</b>             | <b>Capability</b>                             | <b>Limitation</b>  |
|------------------------|--|---|--|
| Not reviewer-ready     | Any critical domain below Score 2        | No standardized examiner interaction possible | Examiner must rely on ad hoc evidence and institutional representation |
| Triage-only ready      | All critical domains at Score 2; some at | Basic examiner queries answerable with        | Examiner cannot independently verify;                                  |

| Readiness Level        | Minimum Domain Scores   | Capability   | Limitation   |
|------------------------|---|--|--|
|                        | Score 3   | institutional assistance; not independently verifiable   | replay not available; limited bounded access   |
| Bounded-review-capable | All critical domains at Score 3; CD-09 (bounded review) at Score 3+ | Examiner can access evidence through basic tiered access; content-addressed artifacts verifiable                       | Limited replay; limited PARP discipline; examiner may need operational support for complex queries |
| Replay-capable         | All critical domains at Score 4; CD-10 (replay) at Score 4          | Examiner can independently replay historical states; full checks pack executable                                       | May lack cross-domain portability or resilience under stress                                       |
| Offboarding-capable    | All critical domains at Score 4; CD-12 (offboarding) at Score 4     | Institution can execute offboarding with full proof bundle; legacy transition with integrity preservation              | May lack advanced portability or financial workflow integration                                    |
| Advanced / portable    | All domains at Score 4+; relevant domains at Score 5                | Cross-domain evidence portability; resilience under stress; full adversarial detection; optional financial integration | Represents target state; continuous improvement continues  |

## AC.10 Worked Example Assessments

### Worked Example Assessment Table:

| Institution                        | Profile   | Score Summary                                    | Key Gaps  | Remediation Priority  | Likely Next Phase                                     |
|------------------------------------|---|--|---|---|---|
| Community pharmacy group (SP-PART) | Electronic prescribing; barcode scanning; no content addressing; paper custody logs | CD-01: 2, CD-03: 2, CD-05: 1, CD-06: 1, CD-09: 0 | GAP-WKEV (CD-01, CD-03: digital but not content-addressed); GAP-ABS (CD-05: no digital custody logging); GAP-ABS (CD-09: no bounded review) | P1: Implement custody logging (CD-05); P2: Add content addressing to existing records (CD-01, CD-03); P3: Plan bounded review | Phase 1 (gap-fill for custody and content addressing) |
| Regional distributor (SP-LOW)      | Paper shipping records; no digital evidence; no formal governance                   | CD-01: 0, CD-02: 0, CD-05: 0, CD-11: 0           | GAP-ABS across CD-01, CD-02, CD-05, CD-11   | P1: Full Phase 1 implementation — CPO, provenance, custody, hold-only, governance   | Phase 1 (full)  |
| Hospital                           | Strong  | CD-01: 3,  | GAP-PORT (cross-  | P2: Cross-site  | Phase 2–3   |

| Institution                             | Profile   | Score Summary   | Key Gaps  | Remediation Priority   | Likely Next Phase  |
|---|---|---|---|--|--|
| system (SP-FRAG)                        | pharmacy systems; CDSS operational; good access controls; weak cross-site linkage | CD-03: 3, CD-05: 3, CD-07: 3, CD-09: 3, cross-site: 1                               | site evidence not linked); GAP-RPLY (cross-site replay not possible)                          | evidence linkage; unified reconciliation; P3: Standardize reviewer access across sites           | (site unification)                                       |
| Specialty pharmacy with claims (SP-FIN) | Claims system mature; upstream evidence weak; no temporal assessment              | CD-01: 2, CD-05: 2, CD-06: 1, CD-13: 2 (claims operational but not evidence-linked) | GAP-FIN (claims without upstream evidence); GAP-WKEV (upstream domains not content-addressed) | P1: Upstream evidence (product, authorization, custody, safety); P2: Evidence-linked claim gates | Phase 1 (upstream), then Phase 4 (financial integration) |

## AC.11 Summary Scorecard and Action Map

### Summary Scorecard and Action Map:

| Domain                      | Score  | Evidence Sufficiency          | Material Gap   | Remediation Priority   | Readiness Implication                           |
|-----------------------------|--------|-------------------------------|----------------|------------------------|---|
| CD-01 Product authenticity  | ___ /5 | Sufficient / Partial / Absent | ___ (gap code) | P1 / P2 / P3 / P4 / P5 | Blocks: Phase transition if <3 for target phase |
| CD-02 Provenance            | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-03 Authorization         | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-04 Prescription validity | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-05 Custody               | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-06 Dispensation          | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-07 Safety evidence       | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-08 Recall / correction   | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-09 Bounded review        | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-10 Replay                | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-11 Governance            | ___ /5 | ___                           | ___            | ___                    | ___   |
| CD-12 Offboarding           | ___ /5 | ___                           | ___            | ___                    | ___   |

| Domain                     | Score  | Evidence Sufficiency | Material Gap | Remediation Priority | Readiness Implication |
|----------------------------|--------|----------------------|--------------|----------------------|-----------------------|
| CD-13 Financial (optional) | ___ /5 | ___                  | ___          | ___                  | ___                   |

**Scorecard Interpretation Rules:**

- All critical domains at Score  $\geq 3$  → institution is minimally controlled (Phase 2 ready).
- All critical domains at Score  $\geq 4$  → institution is reviewer-ready (Phase 3 complete).
- Any critical domain at Score 0 or 1 → blocking gap; remediate before phase transition.
- Minimum domain score (lowest critical dimension within a domain) governs the domain score.
- Highest-priority remediation targets: domains with the largest gap between current score and target-phase requirement.

**Action Logic:**

For each domain:

1. Assess current score per AC.7 worksheet
  2. Identify gaps per AC.5 taxonomy
  3. Classify materiality (blocking / material / minor)
  4. Prioritize per AC.8 matrix
  5. Map to remediation actions
  6. Verify readiness per AC.9 interpretation
  7. Document in scorecard
  8. Present to governance body for phase transition decision
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# References and Supporting Materials

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**1. Foundational Baseline Frameworks (Normative Anchors)** *This implementation guidance acts as a cross-domain companion layer and relies on the structures, vocabularies, and governance models established in the following baselines:*

- **Baseline A: Ownership Integrity & Reconciliation Pack.** Provides the foundational architecture for Evidence Sets, reconciliation break taxonomies, hold-only containment logic, and non-destructive preservation disciplines (EP Deltas).
- **Baseline B: Operationalization & Conformance Track.** Defines the playbook structure, reference implementation profiles, RACI matrix conventions, change control governance, and tiered supervisory access models.
- **Baseline C: Operational Assurance Artifacts Addendum.** Specifies the Evidence Pack manifest templates, Immutable Log Segment (ILS) logging taxonomy, preservation bundle triggers, liability trigger catalogs, and redaction protocols.
- **Baseline D: Programmable Privacy & ZKP Framework.** Establishes the tiered disclosure ladder (Tier 0/1/2), proof-carrying compliance artifacts, Verifier Output Pack (VOP) conventions, TTL bounds, and freshness/revocation disciplines.
- **Baseline E (Optional): Payments & Settlement Constitution.** Provides the blueprint for evidence-linked settlement confirmation, payout gating, and the management of financially consequential workflows.

## 2. Cryptographic and Technical Standards

- **Secure Hash Algorithms:** SHA-256 (or equivalent cryptographic standards), utilized for generating content-addressed manifests, Canonical Product Objects (CPOs), and ensuring tamper-evident hash-chaining across all Immutable Log Segments (ILS).
- **Content-Addressed Storage Architecture:** Operational standards governing immutability by construction, ensuring that artifacts cannot be modified after storage without breaking the hash linkage.

## 3. Healthcare Alignment Objectives (Non-Normative Context)

Note: This framework provides an operational evidence layer and does not replace medical truth, institutional review, or regulatory decrees. The following represent contextual alignment objectives referenced to map operational evidence to real-world healthcare compliance:

- **Product Identification and Serialization:** Standards such as Global Trade Item Numbers (GTIN), National Drug Codes (NDC), or equivalent serialization identifiers used to anchor Canonical Product Objects (CPOs).
- **Good Distribution Practice (GDP) & Supply Chain Security:** Regulatory standards (analogous to the US DSCSA or EU FMD) that align with the framework's Product

Authenticity Evidence Set (PAES), Custody Evidence Set (CES), and chain-of-custody handoff workflows.

- **Pharmacovigilance and Safety Reporting:** Institutional and regulatory frameworks for capturing adverse events, monitoring contraindications, and executing product recalls, structurally supported by the Safety Evidence Set (SES) and Context-Bound Decision States.
  - **Data Privacy and Minimization Requirements:** Institutional health data protection policies (e.g., HIPAA or GDPR alignment objectives) supported by the framework's tiered reviewer access and pseudonymization protocols.
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