

**Record Keeping & Reporting****1.6**

The Poverello Center, Inc. maintains accurate records of all 340B purchases and patient utilization of the program, certifying yearly that we demonstrate compliance with program requirements to HRSA.

Purchases of all 340B drugs are documented through invoicing provided to Poverello through the third-party administrator monthly.

Purchases that represent food, housing, transportation, insurance services, co-payment or premium assistance are kept monthly in client files and financial records.

Client records are kept through Athena Health primarily, but through some medical director contracts, other Electronic Medical Records are used to comply with contractual arrangements.

Contracts are maintained on all 340b related arrangements including third party administrator, contract pharmacies, contracted providers, medical directorship, etc. electronically.

Patient Utilization of all 340B services are documented through patient spreadsheets monthly.

An end of year report is generated that outlines the 340b savings received by Poverello and the 340b related expenses incurred by Poverello. In addition, Poverello must submit an annual report to HRSA that demonstrates compliance with program requirements.

Approvals:

Signature:

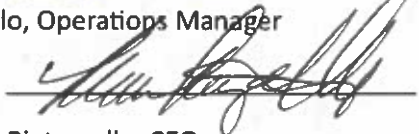


Date:

7/19/24

Jose Castillo, Operations Manager

Signature:



Date:

7/18/24

Thomas S. Pietrogallo, CEO

BOD Approved Date: 07/17/2024

Date Established: 04/01/2023

Date Revised: 07/17/2024