

Auditing and Monitoring**1.5**

POLICY The Poverello Center, Inc. will audit and monitor the 340B program to ensure compliance with all program requirements.

I. Auditing

A. Single Entity Audit – Annually, the program is reviewed within the context of our annual audit according to federal guidelines for organizations receiving more than \$750,000 from federal funds.

B. Mock Audit – Additionally, as determined by management and the directors, Poverello may conduct mock audits to ensure program compliance and may authorize funds to select experts to conduct these audits and consult on improvements to the program.

II. Monitoring

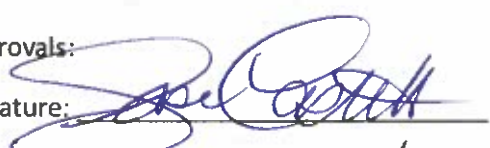
A. Monthly Checklist looks at:

1. Is the program participant a client?
2. Does Poverello have the medical record of the client?
3. Is the prescriber a contracted provider?
4. Has the third-party administrator provided the invoice to the Poverello Center, Inc.?
5. Does a referral to a specialist exist which authorizes additional eligible discounts?

B. Annual Programmatic Review looks at:

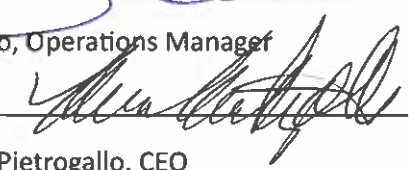
1. Revenue
2. Savings Use
3. Are monthly checklists completed?
4. Are there any emergent problems?

Approvals:

Signature: 

Jose Castillo, Operations Manager

Date: 7/19/24

Signature: 

Thomas S. Pietrogallo, CEO

Date: 7/18/24

BOD Approved Date: 07/17/2024

Date Established: 04/01/2023

Date Revised: 07/17/2024