11-5. Monthly A/OPC Reviews

A/OPCs and CPMs must complete monthly reviews within IOD to promote and measure compliance with internal controls and provide reasonable assurance of the effectiveness of these controls to mitigate program risk. A/OPCs and CPMs are required to complete monthly review(s) each billing cycle. IOD automatically assigns and generates monthly reviews, which become available for completion once all transactions for that agent and billing cycle have been closed. Monthly reviews are considered complete only if 100 percent of all cases selected during the billing cycle have been adjudicated.

- a. A/OPC Monthly Review. Level 4 A/OPCs must complete this review once all BOs have completed all cases assigned to them. The A/OPC reviews the internal controls summary and inputs requested data in IOD. Level 4 A/OPCs will complete monthly reviews within 30 days of the billing cycle end date. A/OPCs must also perform a summary assessment (e.g., using bank reports) of 100% of transactions made during the billing cycle to ensure awareness of purchasing activity and identify purchasing and behavior patterns not otherwise identified by IOD. A/OPCs must also ensure that cases are created for each finding that they identify independently (i.e., not automatically flagged by IOD).
- b. **OA/OPC Monthly Review**. Level 3 A/OPCs must complete this review once all Level 4 A/OPCs assigned to them have completed their monthly reviews. The A/OPC reviews the internal controls summary for their program and concurs with the findings, determinations, and any corrective actions planned or taken. Level 3 A/OPCs are also required to spot-check the monthly reviews conducted by their Level 4 A/OPCs. Level 3 A/OPCs will complete monthly reviews within 10 calendar days of their Level 4 A/OPCs' completion.
- c. **CPM Monthly Review**. CPMs (Level 2 A/OPCs) must complete this review once all Level 3 A/OPCs assigned to them have completed their monthly reviews.
- d. If a monthly review cannot be completed because the BO or A/OPC and their alternates are deployed and have insufficient access to IOD, the Level 3 A/OPC may mark them as "Deployed" in IOD and give approval to complete the monthly review.

Table 11-2: Monthly A/OPC Review Cycle Dates

Action	Review Cycle Milestones	Compliance Mechanism
Level 4 A/OPC completes the monthly review and A/OPC Monthly Checklist in IOD	Cycle End Date + 30 days	Not applicable
Level 3 A/OPC completes the OA/OPC Monthly Review and certifies completion in IOD	Cycle End Date + 40 days	OA/OPCs may suspend the appropriate account(s) at 30 days if DM cases and A/OPC Monthly Reviews are not complete.

Action	Review Cycle Milestones	Compliance Mechanism
CPM completes review and certifies completion in IOD	Cycle End Date + 55 days	CPM suspends appropriate account(s) at 55 days if DM cases and A/OPC Monthly Reviews are not complete.

Parent topic: Chapter 11 - Management Controls and Program Oversight