



To: APOs and CUPOs

AUD #26-08

CC: Jim Barnaby, Deputy Commissioner, State Purchasing Division
Mary Chapman, Deputy Division Director

From: Audits, State Purchasing Division

Date: August 28, 2025

Re: Audit of Open Market Purchases – POs issued in June 2025

Background

Section 1.3.4.5 of the Georgia Procurement Manual (GPM) provides that state entities “may elect to go to the open market to identify a source of supply for the needed good or service (if) the APO/CUPO determines an open market purchase is the appropriate purchasing method under Tier 4 of the Order of Precedence.” When the competitive bidding rules are applicable, under normal circumstances, this election may only be made when no source of supply exists from a:

1. Mandatory statewide contract (Tier 1 of the Order of Precedence)
2. Existing state entity contract (Tier 2 of the Order of Precedence)
3. The statutory source of supply (Tier 3 of the Order of Precedence)

When purchasing from the open market, “the state entity may not split reasonably foreseeable or related purchases into two or more transactions to circumvent the requirement that any purchase of \$25,000 or more is based on competitive bidding.” Section 6.3.1.2 of the GPM states the purchase type of OMP should be used if “A state entity’s purchase made on the open market when not using a contract and the PO amount is less than \$25,000.” Selecting the correct purchase type code of “OMP” for open market purchases allows accurate spend data to be collected by various staff, from contract managers, entity procurement staff, budget analysts, and auditors. The audit scope and methodology used in this audit are summarized in **Appendix A**.

Audit Summary

SPD Audits reviewed every PO coded as an open market purchase across the enterprise with a dollar amount of \$25,000 or greater. This sample included 108 POs that totaled \$10.4 million. These 108 POs represented 0.91% of all OMP POs for June 2025.

Audit Objectives

1. Determine if OMP POs were coded correctly.
2. For OMP POs miscoded, identify the correct purchase type.
3. Identify areas for improvement related to the coding of OMP POs.

Audit Issues

In June 2025, 11,889 POs totaling \$39.3 million were coded as an open market purchase (OMP). Of these POs, 108 POs were \$25,000 or more. These 108 POs totaled \$10.4 million, or 27% of OMP POs issued in June 2025. SPD Audits reviewed these POs to determine if they were correctly coded as OMP.

SPD Audits found that 47 (44%) of the 108 POs sampled appeared to be incorrectly coded as OMP. These POs totaled \$4.6 million (44%) of the \$10.4 million POs reviewed. These 47 POs appeared to be miscoded for the following reasons. These POs are also summarized in **Table 1**.

1. Intergovernmental Agreements (IGA) – these POs were related to grant awards from state entities, most often to local government entities, POs to GCI, or POs issued to other state entities. POs of this sort should be coded as IGA.
2. Construction/Public Works (CSN) – this PO falls under the Construction/Public Works Exemption section of the Georgia Procurement Manual (Section 1.3.6.1).
3. Statewide contracts (SWCC or SWCM) – these were POs to suppliers on either statewide contracts convenience (SWCC) or statewide contracts mandatory (SWCM). The statewide contract number was sometimes cited in the Contract ID field.
4. Exempt (EXM) – these POs were related to services or products exempt from the State Purchasing Act or used an exempt NIGP code on the PO.
5. State entity contract (AC) – these POs appeared to be related to an agency contract (AC) since an existing contract was attached to the PO or a contract number was referenced in the PO header or cited in the Contract ID field.
6. Emergency (EMER) – this PO appeared to be related to procurements made necessary by an emergency.

Table 1
Summary of OMP POs,
which appear to be miscoded – June 2025

Original Purchase Type Code	Correct Purchase Type Code	Description	Number of POs	PO Amount
OMP	IGA	Intergovernmental Agreements	3	\$1,063,083
OMP	CSN	Construction/Public Works	11	\$913,241
OMP	AC	Agency Contract	12	\$696,645
OMP	SWCM	Statewide Contract Mandatory	6	\$608,365
OMP	EXM	Exempt	9	\$592,631
OMP	SWCC	Statewide Contract Convenience	5	\$528,189
OMP	EMER	Emergency	1	\$204,074
		Total	47	\$4,606,228
Sources: 1) PeopleSoft query TGM_oEPOo19D_PO_SPEND_BY_DATE; 2) BOR_OPOo19D_PO_LIST_BY_BU_DTL; 3) PO queries for Georgia Institute of Technology, Georgia State University, and Augusta University; and 4) PO data provided by the University of Georgia.				

Ten of these POs were related to a solicitation or posting on the Georgia Procurement Registry (GPR). These events were five Request for Quotes (RFQ), three sole source postings, and two consortia postings.

For the remaining 61 POs, totaling \$5,841,439, we found the following:

1. Thirty-Eight (38) POs, totaling \$2,631,772 were correctly coded as OMP. These POs were conducted as procurements outside of the authority of the State Purchasing Act and not under the purview of the Department of Administrative Services (DOAS).
2. Fifteen POs, totaling \$2,904,998 were cancelled.
3. Eight POs, totaling \$304,670 were found to be non-compliant. These eight POs are described below.
 - Four POs were with the same state entity and the APO of this entity did not respond to the audit team's emails inquiring about the POs. As of August 24, 2025; no payments have been made on two of the POs, \$4,216 has been paid on one PO and \$12,500 on one PO. None of the services paid for thus far appear to be exempt from the State Purchasing Act.
 - Two POs were the result of a misunderstanding of the bid threshold by the CUPO.
 - One PO was identified by the state entity's procurement office as an unauthorized purchase, and a form describing issues with the procurement was attached to the PO.
 - One PO was the result of a user circumventing the procurement process. Steps have been taken by the state entity to prevent this from recurring.

Recommendations

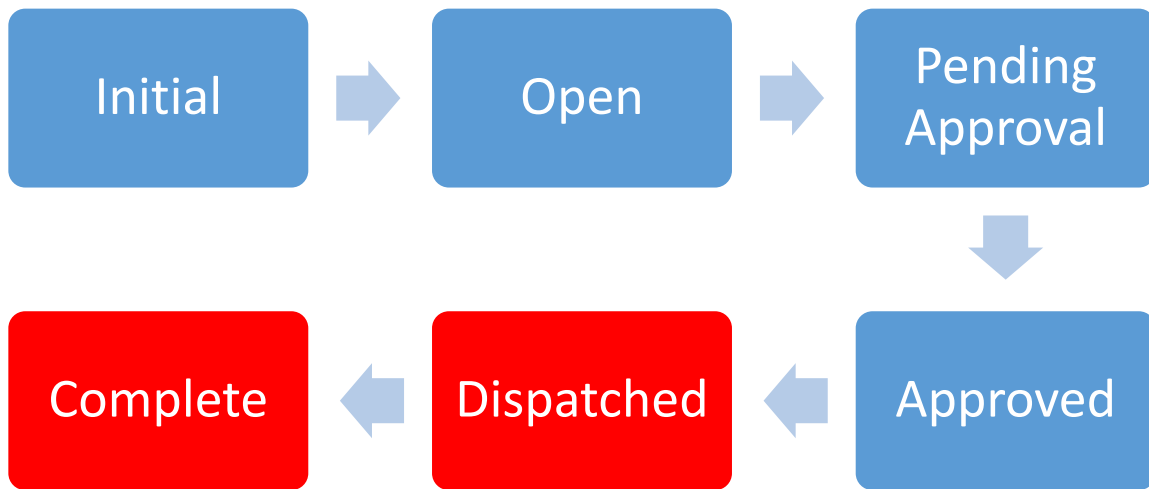
1. APOs and CUPOs should review all recent POs coded as OMP with a value of \$25,000 or more to determine whether the correct purchase type code has been used.
2. APOs/CUPOs should review PO data from this audit at the buyer level to ensure that staff is adequately trained and, where necessary, re-trained in the correct use of purchase type codes.
3. APOs/CUPOs should ensure staff review [Official Announcement 25-02](#) regarding the revised use of PO type codes and [SPD-AP016 Purchase Order Type Quick Reference Guide](#).
4. Since posting on the GPR allowed the state entity to demonstrate that they have satisfied the competitive bidding requirements, the resulting one-time POs with values more than \$24,999.99 should include the event ID in the PO header or the PO reference field. Additionally, APOs and CUPOs should remind their procurement staff that POs should always be sourced from an event, where possible, so event IDs can easily be referenced on POs and POs to the event from which they emanate.

Appendix A

Audit Background, Scope and Methodology

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This audit is of purchase orders (POs) issued in June 2025 - PO dates between June 1, 2025, through June 30, 2025. The PO dates were current as of the date the PO queries were run, which was the first week of July. The PO queries come from different financial systems. Except for the Georgia Institute of Technology, which uses Workday, all other audited state entities use PeopleSoft for their financial system. It is not the same instance of PeopleSoft since each instance is configured differently. The objective of the audit was to audit POs issued or dispatched. Since the PO queries are run from different financial systems, the terminology used to indicate the PO status varies. For TGM entities, the PO life cycle consists of the following steps:



Only those POs in the stage of dispatched or complete were included in this audit. Phases, before dispatched, represent the internal approval process a state entity uses before the PO is sent to the supplier. For the TGM entities, this is known as dispatched. Complete is the status used when the PO is closed and can no longer be modified or use.