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To: APOs and CUPOs **AUD #27-07**

CC: Carrie Steele, Deputy Commissioner, State Purchasing Division
Mary Chapman, Deputy Division Director

From: Audits, State Purchasing Division

Date: August 31, 2026

Re: Audit of Open Market Purchases – POs issued in June 2026

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)

Section 1.3.4.5.2. of the GPM states that, "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 133 POs that totaled $21.9 million. These 133 POs represented 1.28% of all OMP POs for June 2026.

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 2026, 10,400 POs totaling $48.2 million were coded as an open market purchase (OMP). Of these POs, 133 POs were $25,000 or more. These 133 POs totaled $21.9 million, or 45% of all OMP POs spend issued in June 2026. SPD Audits reviewed these POs to determine if they were correctly coded as OMP.

SPD Audits found that 57 (43%) of the 133 POs sampled appeared to be incorrectly coded as OMP. These POs totaled $11.5 million (53%) of the $21.9 million POs reviewed. These 57 POs appeared to be miscoded for the following reasons. These POs are also summarized in **Table 1**.

1. 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.
2. Statewide contracts (SWCC or SWCM) – these were POs to suppliers on either statewide contract - convenience (SWCC) or statewide contract - mandatory (SWCM). The statewide contract number was sometimes cited in the Contract ID field.
3. Construction/Public Works (CSN) – these POs fall under the Construction/Public Works Exemption section of the Georgia Procurement Manual (Section 1.3.6.1).
4. Sole Source (SS) -these POs were related to a sole source posting done on the Georgia Procurement Registry (GPR).
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, were the result of an award issued through the Georgia Procurement Registry (GPR), or a contract number was referenced in the PO header or cited in the Contract ID field.

Table 1
Summary of OMP POs,
which appear to be miscoded – June 2026

Original Purchase Type Code	Correct Purchase Type Code	Description	Number of POs	PO Amount
OMP	EXM	Exempt	23	$6,851,715
OMP	AC	Agency Contract	17	$2,253,158
OMP	CSN	Construction/Public Works	8	$1,671,403
OMP	SS	Sole Source	4	$172,136
OMP	SWCC	Statewide Contract - Convenience	3	$520,942
OMP	SWCM	Statewide Contract - Mandatory	2	$59,348
		Total	**57**	**$11,528,703**

Sources: 1) PeopleSoft query TGM_0EPO019D_PO_SPEND_BY_DATE; 2) BOR_OPO019D_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.

Eighteen of these POs were related to a solicitation or posting on the GPR. These events were 13 Request for Quotes (RFQ), one of which was a sole brand and five Sole Sources (SS).

For the remaining 76 POs, totaling $10,352,793, we found the following:

1. Sixty-two POs, totaling $9,664,755, were correctly coded as OMP. Sixty-one of 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). One PO was initially under $25,000 but was over the bid threshold after shipping costs were added.
2. Eight POs, totaling $371,203, were cancelled.
3. Four POs, totaling $148,329, were closed without any money being spent on the PO.
4. Two POs, totaling $195,419, were found to be non-compliant. Neither of the POs appeared to be exempt under the State Purchasing Act and should have been awarded through a solicitation or other purchasing method permitted by the GPM. These POs are summarized below:
    - One PO totaling $36,469 was a purchase through a consortia but there was not a corresponding consortia posting on the GPR.
    - One PO totaling $158,950 was described by the APO as a one-time mistake since they thought the purchase was through a statewide contract and did not have to be bid.

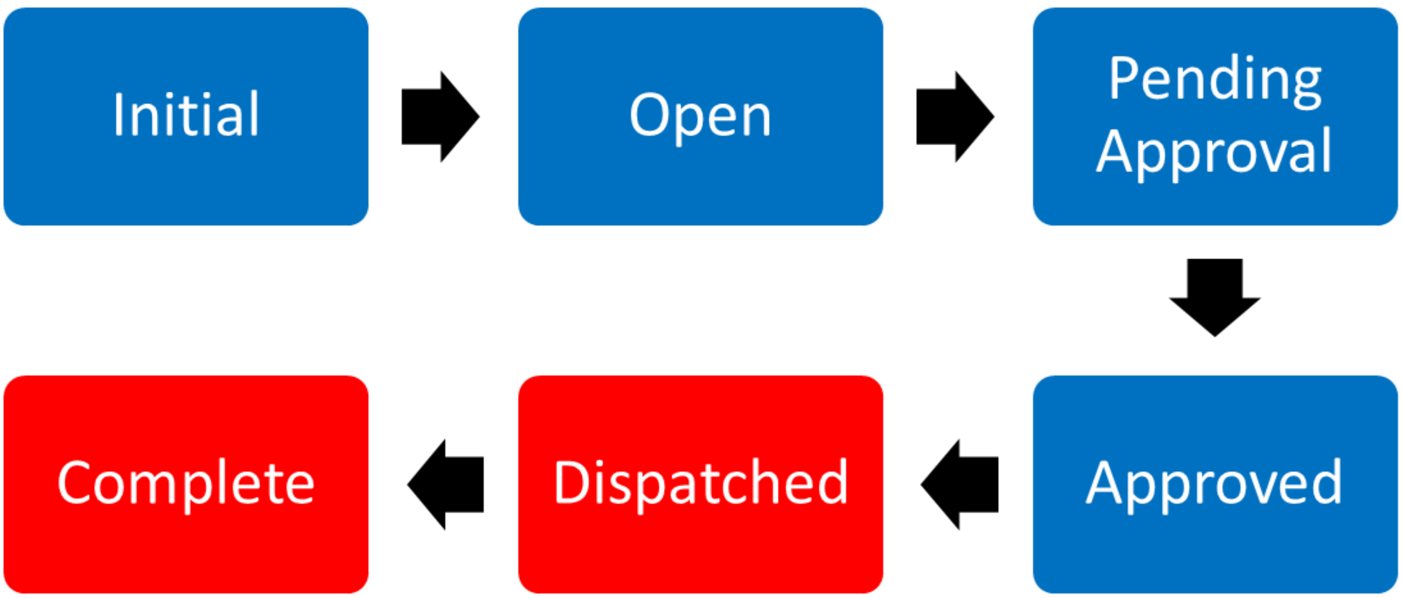
Recommendations

1. APOs and CUPOs should ensure that all procurement staff in their entities review Official Announcement # 26-04 which provides clarification and guidance regarding the competitive bidding threshold.
2. Before completing and dispatching POs each month, APOs and CUPOs should review POs coded as OMP with a value of $25,000 or more to determine whether the correct purchase type code has been used.
3. 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.
4. 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. For activity occurring on or after July 1, 2026, APOs should ensure staff review Official Announcement #26-08 regarding the use of PO type codes and SPD-AP017 GA@WORK PO Type Quick Reference Guide.
5. 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

August 31, 2026

This audit is of purchase orders (POs) issued in June 2026 - PO dates between June 1, 2026, through June 30, 2026. The PO dates were current as of the date the PO queries were run, which was the first week of June. 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 used.