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MEMORANDUM

TO: Agency Directors

FROM: Grant Gillespie

DATE: July 10, 2025

RE: Fiscal Year 2025-2026 Budget - Proviso 104.10

By now, many of you have seen Proviso 104.10 on oversight of the State and Agencies' P-Card programs. This Proviso places key obligations on the Division of Procurement Services and on State agencies. Key obligations of Procurement Services are:

- By October 1, 2025, publish a South Carolina Purchasing Card Policy and Procedures Manual (Policy)
- By October 15, 2025, Develop and provide training and testing on the requirements of the Policy
 - o Both the training and testing will be offered online

Key obligations of Agency Directors are:

- By October 1, 2025, obtain a compliance audit of the agency's P-Card program by a qualified auditor not connected with the P-Card program and send the audit results and corrective action plans to Procurement Services.
 - Audit for compliance with the current State P-Card Policy and agency internal procedures.
 - A qualified auditor not connected with the P-Card program excludes the P-Card Administrator but does not require a CPA Firm
 - Procurement Services has prepared the attached procedures and a checklist that the agency may follow for this purpose
- After October 15, 2025, ensure that no P-Card supervisory or oversight roles are assigned nor P-Cards
 issued to new cardholders before such employees complete P-Card training and successfully pass P-Card
 testing offered by Procurement Services.
- By April 1, 2026, ensure development of an agency-specific P-Card use manual
 - Procurement Services is developing a model Agency P-Card use manual concurrently with development of a revised Policy.
- By April 15, 2026, ensure that every P-Card holder and those with responsibility for implementation and oversight of the Agency's P-Card program as of October 15, 2025, have completed the P-Card training and successfully passed the P-Card testing provided by Procurement Services.
- Ensure the Agency develops, implements, and provides Procurement Services with documentation of an
 internal P-Card annual training program for employees with responsibility for supervision or oversight of
 P-Card programs and for all P-Card holders. This program will provide training on the Agency's internal
 P-Card use manual.

Cc. Agency Finance and Procurement Directors