

OFFICE OF THE CONTROLLER

Compliance Team

Subrecipient Monitoring and Workflow

March 2024





Table of Contents

Subaward Agreement Process	3
Subrecipient Monitoring	6
Invoicing Process and Requirements	11
Resources	44



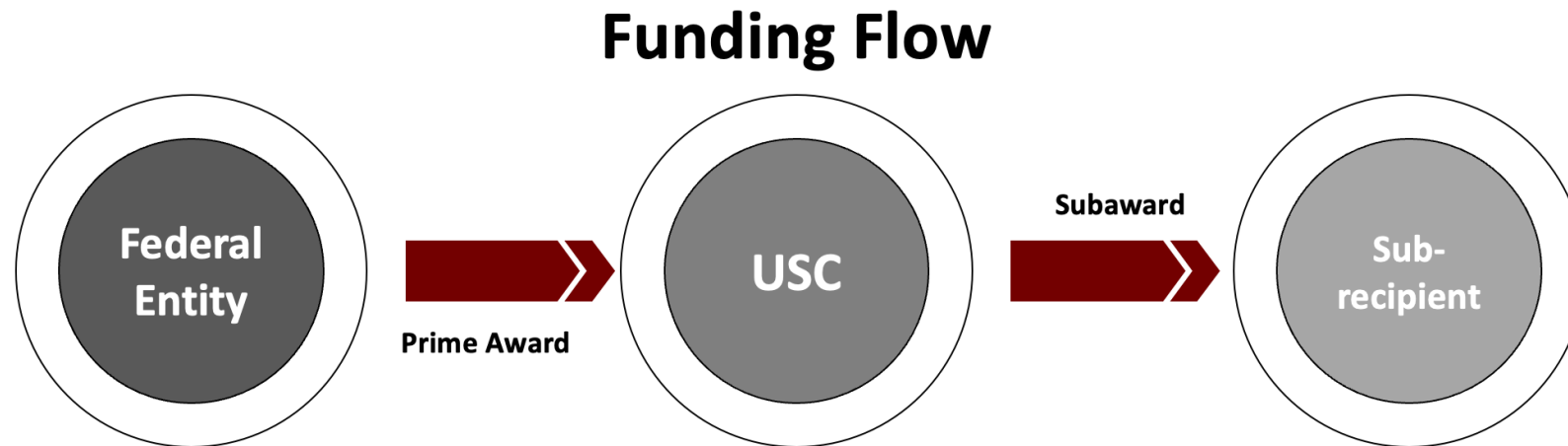
Subaward Agreement Process



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What is a Subaward?

A subaward occurs when a portion of the University's sponsored project is passed through to another entity (the subrecipient) to complete a portion of the sponsored project's scope of work.



The terms and conditions of the University's award flow down to the subrecipient as part of the subaward. Therefore, subrecipients must adhere to applicable compliance requirements contained in the prime award.

Subaward Agreement Process

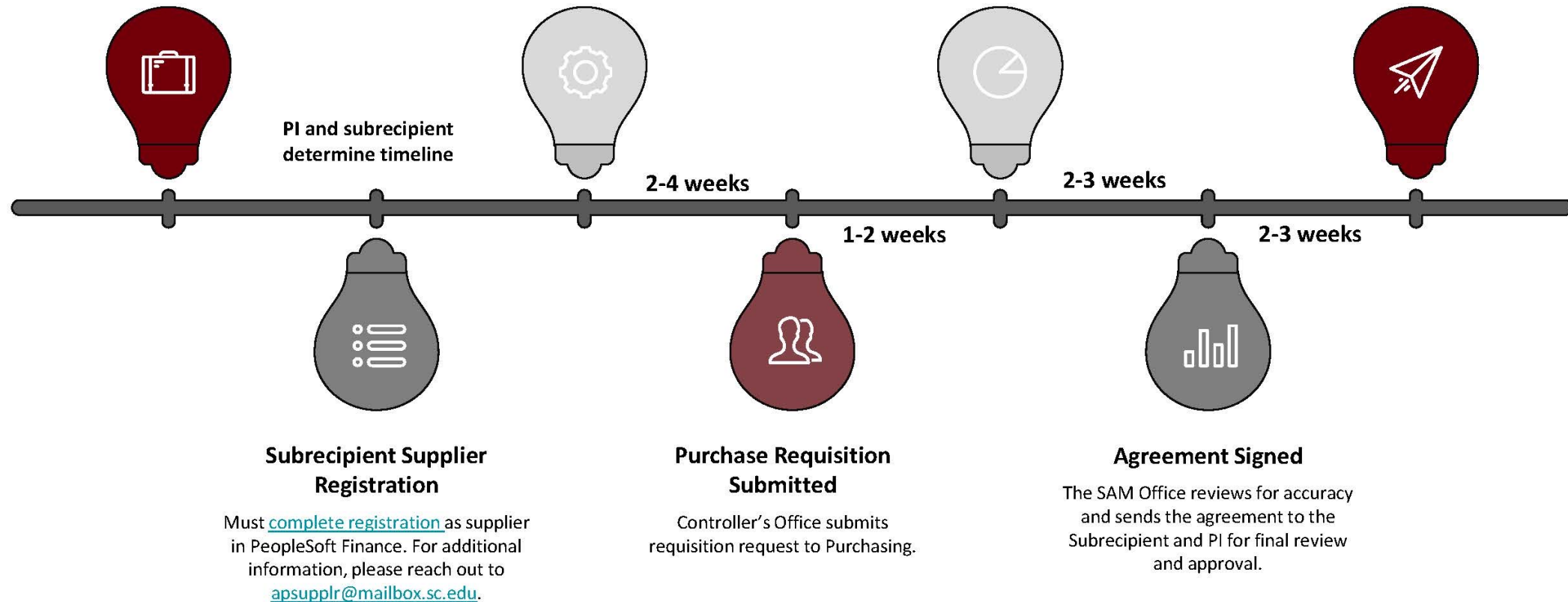
[SAM Office](#)

Required Subrecipient Forms

[Subaward Commitment Form](#), up-to-date budget reflecting award reductions and scope of work must be completed and sent to SAM Office to begin this process. Visit the [SAM website](#) for additional information.

Fully Executed Agreement

The Subrecipient must return an executed agreement to the SAM Office in order to have a valid agreement and begin submitting invoices for payment. subinv@mailbox.sc.edu



* These are suggested time frames, and they can vary. Please reach out to your [SAM Administrator](#) with questions or for updates.

Subrecipient Monitoring



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Subrecipient Monitoring

Under Uniform Guidance, 2 CFR 200.332, all pass-through entities must perform subrecipient monitoring to ensure the subaward is being used for the authorized purpose, in accordance with federal requirements and the terms and conditions of the subaward.

While Uniform Guidance applies to federal awards, the University enforces its requirements across all awards, regardless of source (e.g., federal, state, local). This practice services to promote compliance and achieve consistency.

Non-federal sponsored awards commonly refer to Uniform Guidance, thereby making them subject to it.



Subrecipient Monitoring Ownership

The responsibility for subrecipient monitoring is a team effort that requires the coordination of multiple parties.

For example, the Office of Sponsored Awards Management (SAM) reviews and approves subaward contracts, while the Principal Investigator (PI) monitors the scope of work and project progress.

The Office of the Controller's respective duties are outlined in University policy/procedure FINA 3.31.



Subrecipient Monitoring – Controller's Office

The Office of the Controller is responsible for:



Facilitating the completion of annual subrecipient compliance surveys



Completing annual subrecipient risk assessments



Performing desk reviews of subaward invoices



Performing ongoing compliance reviews of subaward invoices received and approved for payment

Annual Subrecipient Risk Assessments

Based on various factors (e.g., compliance survey responses, recent audit results, recurrent invoicing issues, etc.), a risk classification of high, moderate, or low is assigned to each subrecipient annually. Notices will be sent out on an annual basis to communicate the assessed risk classification to subrecipients.

These risk classifications impact the terms and conditions of the subaward. For example, high-risk subrecipients are required to submit receipt-level documentation to support all invoices.



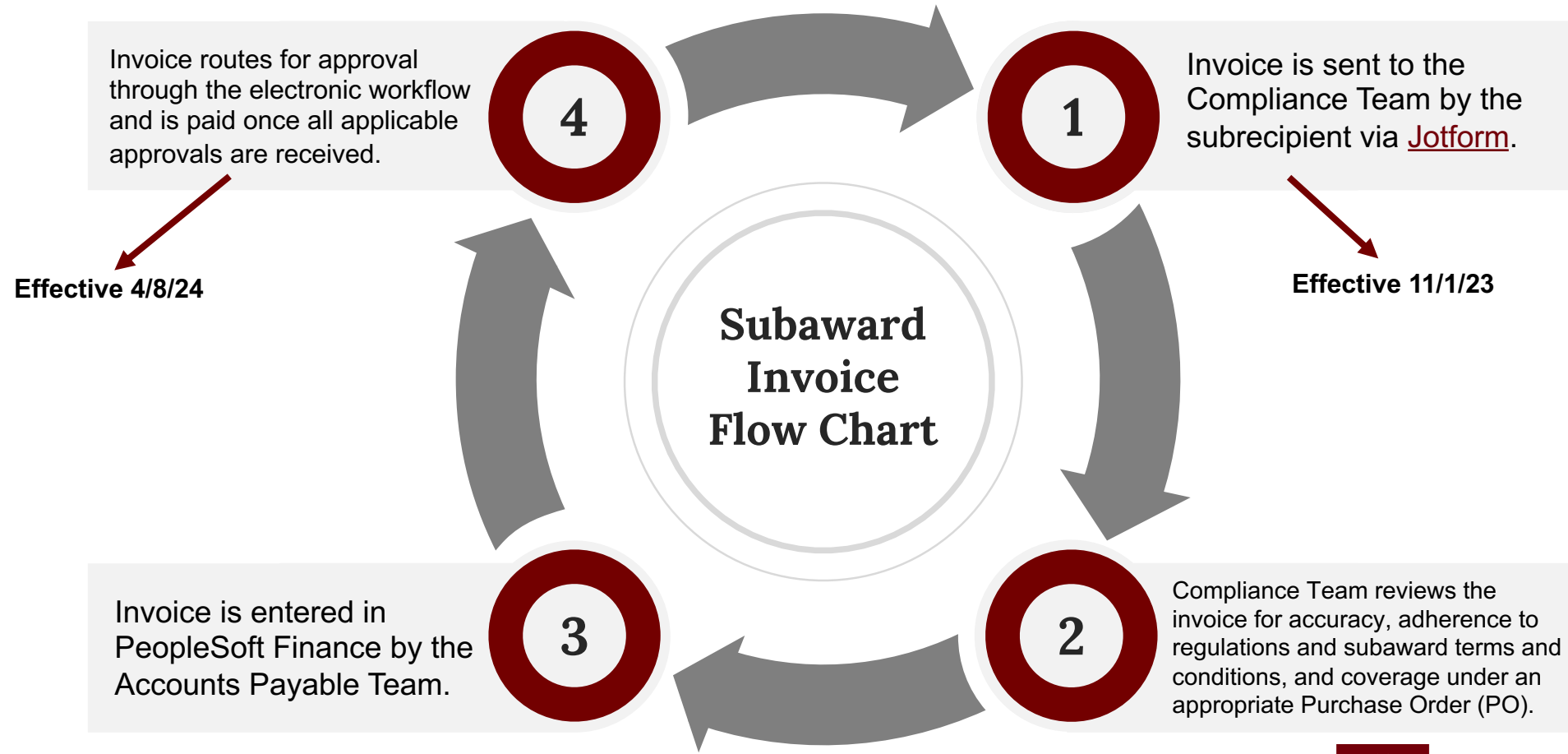
Invoicing Process and Requirements



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Subrecipient Invoicing Process

Review, Processing, and Payment



Workflow Improvement

Currently, all approvals occur manually through email, which has inherent limitations. Effective **April 8th, 2024**, we will begin utilizing existing workflow functionalities within PeopleSoft Finance to streamline the approval process. It will essentially function the same as the workflow process used for Payment Requests.



Workflow Sequence

After successfully matching against the PO and returning a valid budget check, each subaward invoice flows through the following sequence of approvers in the workflow:

1. Controller's Office Compliance Team approval required
2. Project Approvers (USCSP): Both the PI and Approver 1 (if applicable) approval required
 - Query: SC_SECURITY_PROJ_APPROVER
3. Department Approver: One Approver 2 approval required
 - Query: SC_SECURITY_DEPT_APPROVER_ROLE



Project Approvers

Query: SC_SECURITY_PROJECT_APPROVER

SC_SECURITY_PROJ_APPROVER - Project Approvers

PC Business Unit

Project

User ID

Team Member

Status

Download results in : [Excel SpreadSheet](#) [CSV Text File](#) [XML File \(3 kb\)](#)

[View All](#)

Row	Unit	Project	Descr	Project Status	Resource Class	Member Type	Team Member	Description	User	Schedule	Proj Role	Start Date	End Date	Assignment	Sequence Number	Extensi
1	USCSP	100	CTT 2	Active	L	E	[REDACTED]	[REDACTED]	[REDACTED]	1	PI	05/01/2023	04/30/2025		0	
2	USCSP	100	CTT 2	Active	L	E	[REDACTED]	[REDACTED]	[REDACTED]	1	CGA	05/01/2023	04/30/2025		0	
3	USCSP	100	CTT 2	Active	L	E	[REDACTED]	[REDACTED]	[REDACTED]	1	BM	05/01/2023	04/30/2025		0	
4	USCSP	100	CTT 2	Active	L	E	[REDACTED]	[REDACTED]	[REDACTED]	1	APPRV_1	05/01/2023	04/30/2025		0	



Department Approvers

Query: SC_SECURITY_DEPT_APPROVER_ROLE

SC_SECURITY_DEPT_APPROVER_ROLE - Department Approvers by Role

Approver Profile

Department

User ID

Name

USCID

Email ID

View Results

Download results in: [Excel Spreadsheet](#) [CSV Text File](#) [XML File](#) (6 kb)

View All

Row	DEPTID Range Setup	Department	Description	Approver Profile	User ID	Name	USCID	Email ID	PCard Approver	JV Approver	Req / Payment Req Approver	Expenses Approver
1	115	115		APPRV_1							Req PR	Expenses
2	115	115		APPRV_1					PCard	Journal Voucher	Req PR	Expenses
3	115	115		APPRV_1					PCard	Journal Voucher	Req PR	Expenses
4	115	115		APPRV_1						Journal Voucher	Req PR	Expenses
5	115	115		APPRV_2							Req PR	Expenses
6	115	115		APPRV_2						Journal Voucher	Req PR	Expenses
7	115	115		APPRV_2					PCard	Journal Voucher	Req PR	Expenses
8	115	115		APPRV_2						Journal Voucher	Req PR	Expenses

Refer to these columns to determine whether a user has a specific approval role (If populated = Yes, If not populated = No)

The "Req/Payment Req Approver" column must be populated for a voucher/invoice to route to a user for approval

Workflow – Approver Roles

Invoices will automatically route to the users assigned the respective roles in the system. If changes to role assignment are needed, the following steps must be taken:

Type	Role	Required Action
Project Approver	PI	Reach out to your SAM Administrator (in the Office of Sponsored Awards Management) to coordinate the change, per Uniform Guidance regulations.
Project Approver	Approver 1	Reach out to your Post Award Accountant (in Grants and Funds Management) to coordinate the change.
Department Approver	Approver 2	Reach out to the PeopleSoft Finance Team to request the appropriate roles. The PeopleSoft Finance Access Form must be completed, approved, and sent to the pssecure@mailbox.sc.edu mailbox.

After coordinating with the proper group, use the queries from Slides 15 and 16 to validate the appropriate changes and assignments have been made



Workflow – Pending Invoices

Once an invoice is ready for approval, the approver can conveniently access it by clicking on the link provided in the email (see below) or utilizing the Worklist feature in PeopleSoft Finance (see next slide).

Note: Approvers will only receive an email if the appropriate option is checked on their My System Profile page.

Approval is requested for Voucher ID "02376570" Business Unit "USC01"

⏪ Reply ⏪ Reply All ⏩ Forward 📧 ⋮

👤 [Avatar] [Name] [Emails] [Statuses] [Actions] [More] Fri 3/22/2024 8:41 AM

A voucher has been entered that requires your attention.

Business Unit: USC01
Voucher ID: 02376570
Invoice ID: Test WF Email
Invoice Date: 2024-03-22
Gross Amount: 5000

You can navigate to the Voucher Approval page by clicking the link below.

https://fms-uat.ps.sc.edu/psp/FUAT/EMPLOYEE/ERP/c/ENTER_VOUCHER_INFORMATION.VCHR_APPROVE2.GBL?Page=VCHR_APPRVL_AF&Action=U&BUSINESS_UNIT=USC01&VOUCHER_ID=02376570

Favorites ▾ Main Menu ▾ > My System Profile

Workflow Attributes

Email User Worklist User

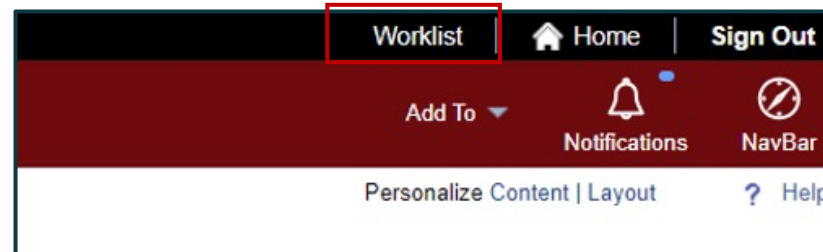
Miscellaneous User Links

Email

Primary Email Account	Email Type	Email Address		
<input checked="" type="checkbox"/>	Business ▾	[Redacted]	+	-

Workflow – Pending Invoices

Worklist Feature:



Click the link (labeled "VoucherApproval") to review and approve an available subrecipient invoice

Worklist

Worklist for [Lindsay Cox](#)

[Detail View](#) Worklist Filters

Worklist Items

From	Date From	Work Item	Worked By Activity	Priority	Link		
Lindsay Cox	03/12/2024	Approval Routing	Approval Workflow	3-Low	VoucherApproval: 78_VCHR1_1901-01-02_N_0_BUSINESS_UNIT:USC01_VOUCHER_ID:02376435 RDC:RA.0.A.	Mark Worked	Reassign



Workflow – Compliance Approval

The first level of approval comes from the Controller's Office Compliance Team:

Compliance Voucher Approval
BUSINESS_UNIT=USC01, VOUCHER_ID=02376435:Pending [Start New Path]
Compliance Approval
Pending
Multiple Approvers
Compliance Approver

Voucher Approval 1
BUSINESS_UNIT=USC01, VOUCHER_ID=02376435:Awaiting Further Approvals [Start New Path]
Voucher Approval 1
Not Routed
Sponsored Project Approver

Voucher Approval 2
BUSINESS_UNIT=USC01, VOUCHER_ID=02376435:Awaiting Further Approvals [Start New Path]
Voucher Approval 2
Not Routed
Multiple Approvers
Department Level 2 Approver

Audit Logs

254 characters remaining

Submit [Approve] [Deny] Pushback Add Comments Hold

One member of the Compliance Team will be required to approve

Approver #1	
Name:	Lindsey Cox
Description:	Lindsey Cox
Approver #2	
Name:	Lisa Sipe
Description:	Lisa Sipe
Approver #3	
Name:	Faye Parks
Description:	Faye Parks
<input type="button" value="Close"/>	

Only the **Approve** or **Deny** options should be used.

Denials require an explanatory comment.



Workflow – Project Team Approval

The second level of approval comes from the Project Approvers within the department:

Compliance Voucher Approval

BUSINESS_UNIT=USC01, VOUCHER_ID=02376435:Approved [Start New Path](#)

Compliance Approval

Approved

Compliance Approver
03/13/24 - 9:46 PM

Voucher Approval 1

BUSINESS_UNIT=USC01, VOUCHER_ID=02376435:Pending [Start New Path](#)

Voucher Approval 1

Pending

Sponsored Project Approver

Voucher Approval 2

BUSINESS_UNIT=USC01, VOUCHER_ID=02376435:Awaiting Further Approvals [Start New Path](#)

Voucher Approval 2

Not Routed

Multiple Approvers
Department Level 2 Approver

[Audit Logs](#)

254 characters remaining

Submit

The PI is required to approve

If applicable, all project team Approver 1's will also be required to approve

Only the Approve or Deny options should be used.

Denials require an explanatory comment.



Subrecipient Invoicing – PI Approval

PIs must be satisfied that work is done in accordance with proposed specifications and that expenses are allowable and allocable to the account.

We encourage PIs to collaborate with their Business Managers if there are questions regarding the administrative and budgetary aspects of an invoice. But approval must ultimately be received from the PI.

Designees will only be authorized in limited circumstances, such as extended medical leave.



Invoice Details

[Approval](#) | [Line Information](#) | [Charge Information](#) | [Related Content](#) | [New Window](#) | [Help](#) | [Pe](#)

Business Unit USC01
 Voucher 02376554
 Invoice Date 03/19/2024
 Invoice Number Subrecipient Test
 Supplier [Redacted]
 ID [Redacted]

Voucher Details

Transaction Currency	USD	Terms	Net 30 Days
Total	94,033.56	Approval Status	Pending
Misc Amt	0.00	Added By	[Redacted]
Freight	0.00		
Sales Tax	0.00		
Use Tax	0.00		
Entered VAT	0.00		

[Attachments \(2\)](#)

Voucher Attachments

Business Unit USC01 Voucher ID 02376554

Details

File Name	Description	User	Name	Date/Time Stamp
Test_File.pdf		[Redacted]	[Redacted]	03/19/2024 9:39:30AM
TestPDFfile.pdf		[Redacted]	[Redacted]	03/19/2024 9:39:30AM

Details

Remit SetID	Remit Supplier	Remitting Address	Scheduled to Pay	Gross Amt	Currency	Supplier Name
USC01	0000019310	Remitting Address	04/18/2024	94033.56	USD	[Redacted]

When navigating to the voucher for approval, various invoice details and attachments will be available for review



Workflow – Department Approval

The final level of approval comes from the Department Approvers within the department:

One Departmental Approver 2 will be required to approve

Compliance Voucher Approval

BUSINESS_UNIT=USC01, VOUCHER_ID=02376435: Approved Start New Path

Compliance Approval

Approved

Compliance Approver
03/13/24 - 9:46 PM

Voucher Approval 1

BUSINESS_UNIT=USC01, VOUCHER_ID=02376435: Approved Start New Path

Voucher Approval 1

Approved

Sponsored Project Approver
03/18/24 - 7:02 PM

Voucher Approval 2

BUSINESS_UNIT=USC01, VOUCHER_ID=02376435: Pending Start New Path

Voucher Approval 2

Pending

Multiple Approvers
Department Level 2 Approver

Approver #1	Name:	Don Fling
	Description:	Don Fling
Approver #2	Name:	Shonda W. Stephens
	Description:	Shonda W. Stephens
Approver #3	Name:	Sharon L. Helgeson
	Description:	Sharon L. Helgeson
Approver #4	Name:	David Roper
	Description:	David Roper
Approver #5	Name:	Michelle E. ...
	Description:	Michelle E. ...
Approver #6	Name:	...
	Description:	...

Only the **Approve** or **Deny** options should be used.

Denials require an explanatory comment.

Audit Logs

254 characters remaining

Submit Approve Deny Pushback Add Comments Hold

Subrecipient Invoicing – Payment

Before payment can be made, several items are required:



Required approvals



A fully-executed subaward agreement or amendment



A dispatched PO, with sufficient funding and budget period



A proper invoice, with all required elements



Any supporting records required by the agreement (e.g., receipts)



Subrecipient Invoicing – Payment

The required items cross multiple parties (e.g., SAM, Purchasing, Office of the Controller, departments, subrecipient).

As such, confirming all items prior to requesting payment often requires significant effort from our Compliance Team (e.g., entering PO requisitions, following up on PO status, following up on subaward agreement status, resolving invoice omissions or discrepancies with subrecipient).

Per 2 CFR 200.305 (and SC Code of Law Section 11-35-45), pass-through entities have 30 days to make payment after receipt of the proper invoice, unless it is reasonably believed to be an improper request.



Subrecipient Invoicing – Terms and Conditions

When signed by all parties and fully executed, subaward agreements and any associated amendments represent binding contracts. As such, in order to comply with Uniform Guidance, the terms and conditions outlined in the subaward must be adhered to for an invoice to be paid from sponsored funds.

When an instance of noncompliance is identified and cannot be resolved, the associated invoice cannot be paid with sponsored funds. Instead, the department will have the option to pay the invoice from departmental funds or deny the invoice.



Subrecipient Invoicing – Submission

Subrecipients must submit subaward invoices using the Subaward Invoice Payment Request Form available at the following link:

[Subaward Invoice Payment Request Form](#)

Use of this form will generate an automatic confirmation email with a unique Submission ID.

Effective 11/1/23, the language was updated in subaward agreements to reflect the new submission requirement (typically in Attachment 3A):

Financial Contact Name:	Controllers Office Compliance Team		
Email:	SUBINV@mailbox.sc.edu	Telephone Number:	
Email invoices?	<input checked="" type="radio"/> Yes <input type="radio"/> No	Invoice email (if different):	https://form.jotform.com/232335498975067



Subrecipient Invoicing – Questions

Questions regarding this process may continue to be addressed to the central subrecipient invoicing mailbox, SUBINV@mailbox.sc.edu, or directly to our Compliance Team:

- Faye Parks, Senior Compliance Manager
- Lisa Sipe, Senior Compliance Accountant

Please note – any specific question should reference the associated Submission ID.



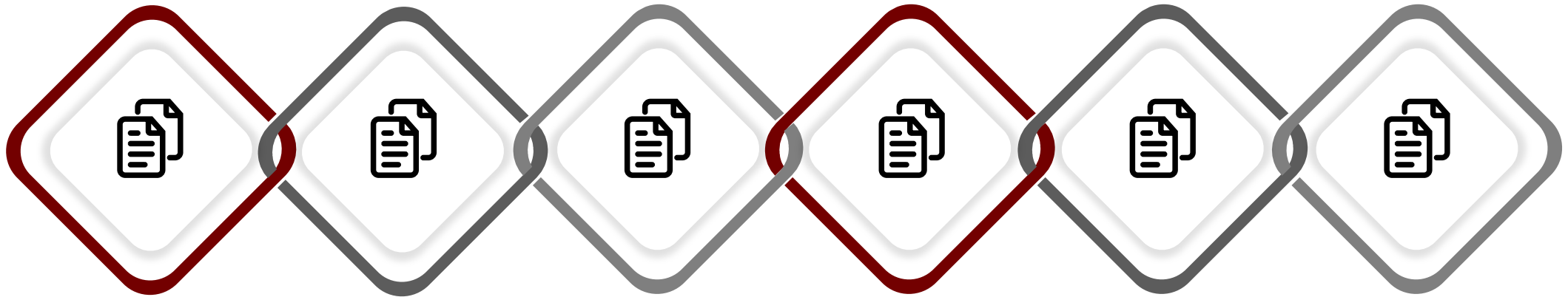
Subrecipient Invoicing – Submission Form

This process improvement was implemented to:

Improve the
uniformity of invoice
submissions

Reduce the frequency of
subsequent follow-ups

Facilitate improved
tracking of
outstanding invoices



Obtain required
information at the
time of submission

Limit the number of
returned invoices

Provide subrecipients with
invoice receipt
confirmation and a
Submission ID for
referencing purposes

Subrecipient Invoicing – Submission Form

Along with attaching a copy of the invoice and any required supporting documentation, the form requires an identification of the following at the time of submission:



Subaward Number



**Invoice Performance
Period or Services Dates**



Certification



Purchase Order Number



Invoice Number



**Organizational Contact
Information**



Project Number



Invoice Amount



From: Subaward Invoice Jotform <noreply@jotform.com>
Sent: Monday, October 2, 2023 1:58 PM
To: [REDACTED]
Subject: We have received your submission for Inv001, 2,500.00



We have received your subaward invoice submission for invoice Inv001 in the amount of 2,500.00 on subaward 23-8734. Please allow 5-7 business days for approvals and processing.

If you have questions regarding this submission; please reach out to Lisa Sipe or Faye Parks at subinv@mailbox.sc.edu. Please include your submission ID in any inquiries.

Subaward Invoice Payment Request

Submission ID: 5720786581025808797

Organization/Entity Name: Clemson University

Purchase Order Number
or Subaward Number (All
invoice submissions must
include the purchase
order number or subaward
number) 23-8734

Purchase Order Number 2000045863

Project Number 10010325

Invoice Performance Period or Service Dates:	Start Date	End Date
---	------------	----------

Subrecipient Invoicing – Submission Form

Upon submission, the subrecipient will receive a confirmation email that includes all invoice details and a message from the Compliance Team.



ACTION: Sub Invoice 23-5555, 003, 1800, SC State



Jotform <noreply@jotform.com>
To SUB, INVOICE

sample_invoice_template.pdf
196 KB



23-5555 - 003 - 1800 - SC State

SC State has requested payment for 003 in the amount of 1800 on subaward 23-5555 , purchase order 2000056998. Please review and approve for payment by replying directly to this email message.

Subaward Invoice Payment Request

Submission ID: 5715448783117241094

Organization/Entity Name: SC State

Purchase Order Number
or Subaward Number (All
invoice submissions must
include the purchase order
number or subaward
number)

Purchase Order Number 2000056998

Project Number 10013354

Invoice Performance

Subrecipient Invoicing – Submission Form

Simultaneously, the Compliance Team will receive an email notifying them of the submission, which will trigger the review process.



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Subrecipient Invoicing – Required Elements

The Terms and Conditions section of the subaward agreement (typically item 2) specify the required minimum elements that must be included on the invoices prior to payment. These usually include:

- ✓ Current costs
- ✓ Cumulative costs (including any cost sharing)
- ✓ Breakdown by major cost category
- ✓ Subaward number
- ✓ Certification (and signature)



Subrecipient Invoicing – Required Elements

Example certification:

“By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements, and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil, or administrative penalties for fraud, false statements, false claims, or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).”

The invoice must also be submitted using the Subrecipient’s standard invoice. While invoice templates/examples and guidance can certainly be provided to assist, the invoices must be prepared by the subrecipient.



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Subrecipient Invoicing – Timeliness

The following language is typically included in subaward agreements:

“A final statement of cumulative costs incurred...marked as ‘FINAL’, must be submitted to the pass-through entity’s Financial Contact...not later than 60 days after the final Budget Period end date...”

If an agreement is amended to extend the budget period end date (e.g., no-cost extension), the language below is typically included in the amendment:

“The purpose of this amendment is to extend the end date. End date is changed from X/X/20XX to X/X/20XX... A final statement of cumulative costs, marked ‘FINAL’, must be submitted no later than 60 days after the subaward end date.”

Note: Due date requirements are based on the terms and conditions of the prime award. While the 60-day deadline is the most common, some agreements have 15, 30, or 45-day deadlines, for example.



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Subrecipient Invoicing – Timeliness

This means that, in order to be paid with sponsored funds, a final invoice must be submitted through Jotform by the subrecipient within 60 days* of the Budget Period end date specified in the subaward agreement.

For example, for the agreement below, a final invoice for the subaward must be submitted by 05/30/2024:

FDP Cost Reimbursement Subaward			
Federal Awarding Agency: [REDACTED]			
Pass-Through Entity (PTE):		Subrecipient:	
University of South Carolina		[REDACTED]	
PTE PI: [REDACTED]		Sub PI: [REDACTED]	
PTE Federal Award No: [REDACTED]		Subaward No: [REDACTED]	
Project Title: [REDACTED]			
Subaward Budget Period:		Amount Funded This Action (USD): \$ [REDACTED]	
Start: 04/01/2023	End: 03/31/2024		
Estimated Period of Performance:		Incrementally Estimated Total (USD): \$ [REDACTED]	
Start: 04/01/2016	End: 03/31/2026		

***Reminder: While this example is based on a 60-day deadline, specific due date requirements are based on the terms and conditions of the prime award.**



Subrecipient Invoicing – Timeliness

Adhering to the timeliness requirement for final invoices ensures:

01

Compliance with the terms and conditions of the award and applicable regulations.

02

Appropriate time for the Compliance Team to monitor and review activity and address any issues with the subrecipient.

03

Appropriate time for Grants and Funds Management to complete necessary project close-out activities.



Subrecipient Invoicing – Timeliness

In order to comply with the terms and conditions of the subaward agreement, any requests for no-cost extensions must occur no less than 30 days prior to the desired effective date of the requested change. These requests should be communicated to your SAM Administrator, who will coordinate with the sponsor accordingly.

For example, a no-cost extension for the agreement ending 03/31/2024 would typically have an effective date of 04/01/2024 and need to be requested no later than 03/02/2024.



Subrecipient Invoicing – Frequency

The following language is typically included in subaward agreements:

“Subrecipient shall submit invoices not more often than monthly and not less frequently than quarterly for allowable costs incurred.”

This means that subrecipients are required to submit invoices to Jotform on a quarterly basis, at the least.

Invoices should not be submitted that cover service periods exceeding a quarter. For example, an invoice covering a 12-month period would not comply with the terms and conditions of the award.



Subrecipient Invoicing – Frequency

The quarterly invoicing requirement allows the Compliance Team to appropriately monitor and review activity and address any issues with the subrecipient in a timely manner.

If no activity occurs for a project during a given quarter, it is reasonable that an invoice would not be submitted. However, whenever activity occurs, quarterly invoicing is expected.

Subrecipients may choose to invoice more frequently. However, invoices should not be submitted more frequently than monthly (e.g., weekly, bi-weekly).



Subrecipient Invoicing – Common Issues

Subrecipients send invoices to departments rather than through the electronic form.



Department submit invoices on behalf of subrecipients.



Identifying information (e.g., subaward, PO number, project number) is omitted from the invoice or incorrect/outdated.



PI approval is not provided in a timely manner.



Required supporting records (e.g., receipts) are not provided with invoice submissions.



Invoices are not submitted timely or as frequently as required.



Compliance – Departmental Role

To mitigate payment delays and noncompliance, we recommend PIs communicate with the subrecipient on an ongoing basis to ensure the terms and conditions of the subaward are understood.

PIs and Business Managers should routinely monitor project activity.

Upon signing the subaward agreement, subrecipients are attesting to the fact that they understand and will adhere to the terms and conditions.



Resources



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Available Resources

- [2 CFR 200.332](#)
- [2 CFR 200.305](#)
- [Policy FINA 3.31 – Subrecipient Monitoring](#)
- [Procedure FINA 3.31 – Subrecipient Monitoring](#)
- [Risk Classification Matrix](#)
- [Sample Subrecipient Invoice](#)
- [SAM Website](#)



Questions

Contact:

Compliance Team

controllercompliance@sc.edu

- Lindsey Cox – Director of Compliance and Tax
- Faye Parks – Senior Compliance Manager
- Lisa Sipe – Senior Compliance Accountant



THANK YOU!

Office of the Controller



Alone, we can do so little; together,
we can do so much.



Address:

1600 Hampton Street
Columbia, SC 29208



Contact Number:

Phone: 803-777-2602
Fax: 803-777-9586



Email Address:

controller@sc.edu



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