SEAN SCANLON
STATE COMPTROLLER

TARA DOWNES
DEPUTY COMPTROLLER

STATE OF CONNECTICUT
OFFICE *of the* STATE COMPTROLLER
165 Capitol Ave.
Hartford, CT 06106

MEMORANDUM NO. 2026-25

July 2, 2026

TO THE HEADS OF ALL STATE AGENCIES

Attention: **Agency Heads, Chief Administrative and Fiscal Officers, Business Managers, and Core-CT Accounts Payable and Purchasing Module Users**

Subject: **Exceptions to Purchase Order Requirement, Non-PO Vouchers**

I. PURPOSE

To provide guidance on what standard exemptions allow agencies to issue payment vouchers without a Purchase Order (Non-PO), and to outline the process for requesting a non-standard exemption to the required use of a purchase order to satisfy state obligations. This memo supersedes Comptroller's Memorandum 2008-38.

II. AUTHORITY

The Comptroller has authority over the payment process and coordinates the pre-encumbrance of funds for future payments, using Purchase Orders, with other agencies according to state statutes.

a. CGS 3-112: **Powers and duties.** "(a) The Comptroller shall: […](2) register all warrants or orders for the disbursement of the public money; (3) adjust and settle all demands against the state […]; (4) prescribe the mode of keeping and rendering all public accounts of departments or agencies of the state and of institutions supported by the state or receiving state aid by appropriation from the General Assembly; (5) prepare and issue effective accounting and payroll manuals for use by the various agencies of the state;"

b. CGS 4-98: **Appropriations encumbered by purchase order; current and capital expenditures. Delegation to agency. Purchasing cards. "**(a) Except for such emergency purchases as are made by a budgeted agency under regulations adopted by the Commissioner of Administrative Services, no budgeted agency or any agent thereof shall incur any obligation, by order, contract or otherwise, except by the issue of a purchase order or any other documentation approved by the Comptroller,"

c. State Accounting Manual - Expenditures: **Internal Controls and Reviewing Payment Data** "Additionally, (agencies) should confirm that the invoice for payment is aligned with any applicable PO encumbrances or Non-PO approvals."

III. STANDARD EXEMPTIONS

The Comptroller's Office generally allows payment vouchers to be processed as Non-PO for the categories listed below. If an agency is unable to determine if their situation conforms to the scenarios listed below, they should send details to osc.apdpa@ct.gov for additional guidance.

a. **Board Member Payments**
   1. Payments to elected or appointed members of state boards and commissions as allowed by state statute, regulations, or bylaws governing such boards can be processed as Non-PO vouchers.

b. **Client Entitlements**
   1. Program payments guaranteed to specific populations or clients receiving aid from state agencies as prescribed by state statute can be processed as Non-PO vouchers. The applicable statute should be noted on the voucher.

c. **Disbursements from Funds Awaiting Distribution (FAD) Accounts**
   1. Core-CT does not currently support the use of Purchase Orders to create payments from accumulation accounts. These vouchers will continue to be processed as Non-PO vouchers.

d. **Grant Transfers**
   1. A PO is required when a fully executed agreement exists between the agency and the recipient (such as an MOU, MOA, or grant award agreement) that establishes obligations between the parties, the agreement must be entered into the Core-CT Procurement Contract module or attached to the Purchase Order.
   2. Grant payments may be processed as Non-PO vouchers when they are distribution of funds authorized by statute, budget appropriation, or a recognized grant program, and do not involve the purchase of goods or services. When the payment is program-driven rather than a procurement action, a purchase order is not required.
   3. For grant transfers processed as Non-PO vouchers, agencies must retain documentation that identifies the statutory or program authority for the payment and supports the recipient's eligibility and payment amount. Agencies should also reference key grant information on the voucher (e.g., attachment or payment note), including:
      i. Grant Title/Name
      ii. Authority
      iii. Issuer (Federal, State, etc.)

e. **Imprest Account Funding**
   1. Imprest accounts separate from agency petty cash which require periodic replenishment after reconciling receipts for payments may be funded by a Non-PO voucher.

f. **Petty Cash Replenishments**
   1. Payments to replenish petty cash accounts may be processed as Non-PO vouchers in accordance with the State Accounting Manual – Expenditures: Petty Cash Account Activities.

g. **Postage**
   1. Purchase Orders should still be used by agencies that wish to encumber funds for the purpose of maintaining or tracking postage budget.
   2. The purchase of postage or replenishment of postage accounts with the United States Postal Service may be processed as Non-PO vouchers.
      i. If funding an EPS or other USPS service account, contact osc.apdvf@ct.gov to receive options for ACH/EFT funding of your account.
   3. Agencies may process Non-PO vouchers to fund accounts with other approved postal providers for outbound delivery services using nationally recognized shipping companies (e.g., FedEx, UPS). Contact osc.apdpa@ct.gov if you are unsure if your provider qualifies.

h. **Refunds/Reimbursements**
   1. Payments returning funds previously paid to the state, such as overpayments, fee reversals, or payments for goods or services not provided may be processed as

Non-PO vouchers. Agencies must retain documentation supporting why the refund or reimbursement is due.

i. **Court Ordered Payments**
   1. Payments issued to fulfill court orders or stipulated agreements resolving lawsuits or mediation cases, or other singular payments that fulfill legal debts of the state as decided by a judge or mediator may be processed as Non-PO vouchers.

j. **Town/Government Payments**
   1. Purchase Orders are required for programs where contracts or other executed agreements (e.g., MOU, MOA) exist, where policy requires pre-encumbrance, or situations where either party need to document specifics related to the transaction.
   2. Payments to towns or municipalities for incidental use may be processed as Non-PO vouchers.
   3. Payments to the federal government, other states, or their county or municipal governments for documents, certifications, information, or other situations which require intergovernmental cooperation for CT state officials to fulfill their obligations under CT General Statutes may be processed as Non-PO vouchers.

k. **Interagency Transactions:**
   1. Purchase Orders are required if an MOA/MOU exists, the agency is tracking encumbrance, or it is for specialized preordered goods or services.
   2. Agencies may also use a PO for interagency transactions if using one supports their business process.
   3. If a transfer invoice is for an incidental expense which was already incurred it may be processed as a Non-PO voucher.

IV. AGENCY PO EXEMPTION REQUESTS

Agencies may submit specific scenarios to be considered for exemption from purchase order requirements for categories outside those listed above. **PO Exemption Request Form** (CO-765) should be submitted to osc.apdpa@ct.gov for consideration. If approved, agencies may use Non-PO vouchers for the documented scenario until the exemption approval expires. Exemptions are valid for a maximum of five years. Agencies may reapply prior to the expiration date if continued exemption is needed.

V. QUESTIONS

Questions regarding this Memorandum or the completion of the forms should be directed to osc.apdpa@ct.gov.

DocuSigned by:

03479587B0B543C...

SEAN SCANLON
STATE COMPTROLLER

SS:HH
http://www.osc.ct.gov