2026

Annex Charter School

PROCEDURE FOR TRACKING NON-DOMESTIC FOOD PURCHASES

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Annex Charter School

Written Procedure for Tracking Non-Domestic Food Purchases

USDA Buy American Provision – Child Nutrition Program

Effective School Year: 2026–2027
Responsible Program: Child Nutrition Program (CNP)
School Food Authority: Annex Charter School

1. Purpose

Annex Charter School will follow the USDA Buy American provision and make every effort to purchase domestic food products to the maximum extent practicable. The school will maintain a tracking system to identify non-domestic food purchases, monitor total annual commercial food costs, and ensure non-domestic purchases do not exceed the applicable federal threshold.

The current threshold is **10% of total annual commercial food costs**. Annex will monitor changes to federal requirements and update this procedure when the applicable threshold changes.

2. Position Responsible for Tracking Purchases and Annual Food Costs

The **Child Nutrition Manager** is responsible for maintaining the Buy American tracking records and monitoring the cost of non-domestic food purchases and total annual commercial food costs.

The Child Nutrition Manager will review product labels, vendor specifications, invoices, and supplier certifications to determine whether products meet USDA domestic product requirements. Products with unverified country-of-origin information will be identified as pending verification until supporting documentation is obtained.

3. Tracking Tool and Required Documentation

Annex Charter School will use the **Annex Buy American Tracking Form**, supported by vendor invoices, product specifications, country-of-origin documentation, supplier certifications, and other applicable procurement records.

The tracking form will document the following information, as applicable:

- Date of purchase or delivery
- Vendor or distributor name
- Product name, brand, and product number/SKU
- Quantity purchased and unit of measure
- Unit price and total cost of the purchase
- Country of origin or domestic-origin verification status

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- Product classification as domestic, non-domestic, or pending verification
- Applicable Buy American exception and reason for the exception
- Supporting documentation maintained on file
- Running total of non-domestic food costs
- Running total of annual commercial food costs
- Current percentage of non-domestic food purchases

All non-domestic purchases that count toward the regulatory threshold will be included in the calculation, including products appearing on the Federal Acquisition Regulations (FAR) Nonavailable Articles List.

4. Frequency of Tracking and Calculation

The Child Nutrition Manager will review food purchases and supporting documentation when deliveries are received and invoices are processed. The Buy American Tracking Form will be updated at that time.

At least monthly, the Child Nutrition Manager will review and reconcile tracking records with available invoices and purchasing records, update year-to-date totals, and calculate the percentage of non-domestic food purchases.

The percentage will be calculated as follows:

Total cost of non-domestic food purchases ÷ Total annual commercial food costs × 100 = Percentage of non-domestic purchases

The Child Nutrition Manager/Director will maintain an ongoing record of annual commercial food costs and monitor purchasing trends to identify whether projected year-end non-domestic purchases may approach or exceed the applicable threshold.

At the end of the school year, the Child Nutrition Manager and/or Director will complete a final reconciliation and retain the annual calculation and supporting records with the Child Nutrition Program procurement documentation.

5. Review and Monitoring of Compliance

The **Child Nutrition Manager** is responsible for reviewing the tracking data, verifying the accuracy of the recorded costs, monitoring the percentage of non-domestic purchases, and ensuring that documentation supports the use of applicable Buy American exceptions.

The **School Administrator or School Director** will review the tracking summary and any identified compliance concerns. If purchases are projected to approach or exceed the applicable

threshold, the Child Nutrition Manager will work with the Child Nutrition Director to identify domestic alternatives, review planned purchases, and determine appropriate corrective action.

Annex will prioritize domestic products whenever practicable and will document applicable exceptions and efforts to obtain domestic alternatives.

6. Buy American Accommodation Request to ODE

If the tracking data indicate that non-domestic purchases have exceeded, or are projected to exceed, the applicable threshold, the Child Nutrition Manager will promptly notify the School Nutrition Director and prepare the **ODE Buy American Exception Threshold Accommodation Request Form**.

The Child Nutrition Director is responsible for preparing and submitting the request to the Oregon Department of Education (ODE), with review and approval by the School Administrator or authorized SFA official before submission.

The request will include the required information, supporting purchase records, the current or projected non-domestic purchase percentage, the circumstances contributing to the projected or actual threshold issue, and the steps Annex will take to increase domestic purchasing and return to compliance.

Annex will submit the request promptly when a potential threshold issue is identified and will not treat the request itself as approval. Any temporary accommodation must be approved by ODE. Annex will continue monitoring purchases and implementing corrective steps while working with ODE as applicable.

7. Record Retention

The Child Nutrition Manager will maintain the Buy American Tracking Form, monthly summaries, annual calculations, invoices, vendor certifications, product specifications, exception documentation, accommodation requests, and related correspondence with Annex Charter School's procurement and Child Nutrition Program records.

Records will be retained in accordance with applicable federal, state, and program record-retention requirements and made available to ODE upon request.

8. Annual Review of Procedure

The Child Nutrition Director and School Administrator will review this procedure annually and revise it as needed to reflect current USDA and ODE requirements, the applicable non-domestic purchase threshold, and Annex Charter School's purchasing practices.

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Prepared by: Eva Folke
Title: Child Nutrition Director
Date: 10/27/26

Reviewed/Approved by: _____
Title: School Administrator / Authorized SFA Official
Date: _____

ODE reference: Oregon's procurement resources include the Buy American requirements, tracking templates, and the accommodation request form. The current 10% threshold applies beginning in school year 2025–2026; the federal schedule lowers it to 8% beginning in school year 2028–2029 and 5% beginning in school year 2031–2032.

Open ODE's Child Nutrition Procurement Resources