Instructions for the Buy American Purchasing Tracker

The U.S. Department of Agriculture's (USDA) Buy American requirement applies to all procurement procedures, solicitations, and contracts for the school nutrition programs, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, Afterschool Snack Program (ASP) of the NSLP, and Fresh Fruit and Vegetable Program (FFVP).

Overview of Buy American Requirement

All foods purchased using funds from the school food authority's (SFA) nonprofit school food service account (NSFSA) must comply with the Buy American requirement. This requirement is specified in the federal regulations for the NSLP (7 CFR 210.21 (d)) and SBP (7 CFR 220.16 (d)), and the USDA final rule, Child Nutrition Programs: Meal Patterns Consistent with the 2020 - 2025 Dietary Guidelines for Americans.

The Buy American requirement specifies that schools and institutions must purchase domestic commodities or products to the maximum extent practicable.

- A "domestic commodity or product" is an agricultural commodity that is produced in the United States (U.S.), and a food product that is processed in the U.S. substantially using agricultural commodities that are produced in the U.S.

- "Substantially" means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

For more information, refer to the Connecticut State Department of Education's (CSDE) resource, *Buy American Requirement for the School Nutrition Programs*, and visit the "Buy American Requirement" section of the CSDE's Procurement for School Nutrition Programs webpage.

Access CSDE's Buy American Purchasing Tracker Worksheet

The CSDE designed the Buy American Purchasing Tracker Excel worksheet to assist SFAs with tracking their non-domestic expenditures.

> Use this link to access the CSDE's *Buy American Purchasing Tracker*.

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How to Use the Worksheet

The guidance below provides instructions for each tab in the worksheet.

Buy American Overview Tab

Enter the required data in the blue fields. All other fields calculate automatically.

- **Prior or Current School Year Forecasted Budget for Total Cost of Food:** Enter either the prior or current school year forecasted budget for the total cost of food.
- **Targeted Percentage of Food Cost for Non-domestic Food Expenditures:** Use the drop-down menu to select the required targeted annual percentage of food cost for non-domestic food expenditures, based on the limits below.
    - School year (SY) 2025-26 through SY 2027-28: 10 percent
    - SY 2028-29 through SY 2030-31: 8 percent
    - SY 2031-32 and thereafter: 5 percent
- **Forecasted Annual Non-Domestic Expenditures:** The tool will calculate the district's forecasted dollar amount available for non-domestic food expenditures.
- **Actual YTD Total Cost of Food:** Calculates automatically based on district data entered in each monthly tracker (July through June).
- **Actual YTD Non-Domestic Expenditures:** Calculates automatically based on district data entered in each monthly tracker (July through June).
- **Actual Percentage of Food Cost for Domestic Food Items:** Calculates automatically based on district data entered in each monthly tracker (July through June).
- **Actual Percentage of Food Cost for Non-domestic Food Items:** Calculates automatically based on district data entered in each monthly tracker (July through June). The field shading indicates if the district's annual percentage is on target.
    - Green shading indicates annual purchasing does not exceed the limit.
    - Yellow shading indicates annual purchasing exceeds the limit within 5 percent and purchasing adjustments are needed.
    - Pink shading indicates annual purchasing exceeds the limit by more than 5 percent and purchasing adjustments are needed.

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Buy American Tracking by Month Tab

This section provides an annual summary of all monthly non-domestic expenditures. Use this section to adjust purchases throughout the year to maintain the 10 percent cap for non-domestic expenditures.

- **Monthly Total Cost of Food:** Enter the food cost for each month in the blue fields.
- **Monthly Non-domestic Expenditure:** Calculates automatically based on district data entered in each monthly tracker (July through June).
- **Percentage of Food Cost for Non-domestic Food Items:** Calculates automatically based on district data entered in each monthly tracker (July through June). The field shading indicates if the district's monthly percentage is on target.
    - Green shading indicates monthly purchasing does not exceed the limit.
    - Yellow shading indicates monthly purchasing exceeds the limit within 5 percent and purchasing adjustments are needed.
    - Pink shading indicates monthly purchasing exceeds the limit by more than 5 percent and purchasing adjustments are needed.

Monthly Trackers (July through June)

Complete the applicable tracker for each month. For each product, enter the name of the company, the item description, the Buy American exception that applies (exception 1 or exception 2), the number of units purchased, the price per unit, and the total cost (refer to "Example of Completed Monthly Tracker" below).

- **Exception 1:** The product meets exception 1 if it is listed on the Federal Acquisitions Regulations (FAR) Non-available Articles List (FAR 25.104) and/or is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality. The Nonavailable Articles List is a list of items that are considered by the federal government to be not available in the U.S. and are therefore excepted from the Buy American statute.
- **Exception 2:** The product meets exception 2 if competitive bids reveal the costs of a U.S. product are significantly higher than the non-domestic product. The definition of "significantly higher" is not defined by the USDA. The USDA allows SFAs the discretion to define "significantly higher" to provide the appropriate flexibility needed for purchases based on SFAs' diverse needs. The SFA is responsible for determining the dollar amount or percentage that constitutes a significantly higher cost for a domestic product, and therefore permits the use of an exception.

Instructions for the Buy American Purchasing Tracker

Example of Completed Monthly Tracker

Company	Item Description	**Exception Type:** **Exception 1:** The product is listed on the FAR Nonavailable Articles List and/or is not produced/ manufactured in the U.S. in sufficient Quantities. **Exception 2:** Competitive bids reveal the cost of a U.S. product is significantly higher.	Number of Units	Price Per Unit	Total Cost
ABC Food Supply	Frozen juice cup	Exception 2	22	$12.50	$275.00
XYZ Food Delivery Co.	All items on invoice	Exception 1	1	$1,225.00	$1,225.00

Questions

For questions regarding this worksheet, please contact the district's CSDE school nutrition team member.

Resources

Buy American Requirement for the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/procure/buy_american_requirement_snp.pdf

Buy American Requirement (CSDE's Procurement for School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/procurement-for-school-nutrition-programs/buy-american-requirement

USDA Memo SP 09-2026: Buy American Accommodation Process for School Year 2026-2027:
https://www.fna.usda.gov/schoolmeals/buy-american-sy26-27

Instructions for the Buy American Purchasing Tracker

For more information, visit the "Buy American Requirement" section of the CSDE's Procurement for School Nutrition Programs webpage or contact the procurement staff at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/procure/buy_american_purchasing_tracker_snp_instructions.pdf.

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To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. mail: U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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