Crediting Whole Grains in the National School Lunch Program and School Breakfast Program

This guidance applies to the meal patterns for grades K-12 and preschoolers (ages 1-4) in the U.S. Department of Agriculture’s (USDA) National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP. For a comparison of each program’s meal pattern requirements for the grains component, see the Connecticut State Department of Education’s (CSDE) handout, Comparison of Meal Pattern Requirements for the Grains Component in the School Nutrition Programs.

Whole grains consist of the entire cereal grain seed or kernel, after removing the inedible outer husk or hull. The kernel includes the starchy endosperm, the fiber-rich bran, and the nutrient-rich germ. Usually the grain kernel is cracked, crushed, flaked, or ground during the milling process. A finished grain product is considered whole grain if it contains the same relative amounts of bran, germ, and endosperm as the original grain.

Whole grains contain a wide variety of nutrients that help reduce the risk of chronic diseases. The CSDE encourages school food authorities (SFAs) to serve 100 percent whole-grain products most often. This provides the best nutrition for children.

Whole Grain-rich (WGR) Requirements

The meal patterns for grades K-12 and preschoolers have different WGR requirements and crediting criteria. WGR foods are required by the meal patterns for grades K-12 in the NSLP, SBP, and SSO, and the meal patterns for preschoolers in the NSLP, SBP, SSO, and ASP; but not the ASP meal pattern for grades K-12. As a best practice, the CSDE encourages ASP sponsors to serve WGR grains.

Grades K-12 in the NSLP, SBP, and SSO

For school year 2020-21, all grains offered at lunch and breakfast must be WGR. For information on the WGR criteria for grades K-12, see the CSDE’s handout, Whole Grain-rich Criteria for Grades K-12 in the NSLP and SBP and the CSDE’s guide, Menu Planning Guide for School Meals for Grades K-12.

Preschoolers in the NSLP, SBP, SSO, and ASP

At least one serving of grains per day must be WGR, between all meals and ASP snacks served to preschoolers. The USDA’s CACFP Best Practices recommends at least two servings of WGR grains per day. For information on the preschool WGR criteria, see the CSDE’s handout, Whole Grain-rich Criteria for Preschoolers in the NSLP, SBP, and ASP.
Serving the same WGR foods to preschoolers and grades K-12

When SFAs serve the same WGR foods to preschoolers and grades K-12, these foods must comply with whichever meal pattern requirements are stricter. Except for grain-based desserts, grain foods that meet the WGR criteria for grades K-12 will meet the preschool WGR criteria. However, grain foods that meet the preschool WGR criteria may or may not meet the WGR criteria for grades K-12. SFAs must consider the different WGR requirements when making menu planning and purchasing decisions. For a summary of the grain requirements, see the CSDE’s handout, *Comparison of Meal Pattern Requirements for the Grains Component in the School Nutrition Programs.* For additional guidance, visit the “Serving the Same Menu to Preschoolers and Grades K-12” section of the CSDE’s *Meal Patterns for Preschoolers in School Nutrition Programs* webpage.

Identifying Whole Grains in Commercial Products

Table 1 lists examples of whole-grain products and ingredients. The ingredients statement on commercial product labels lists ingredients by weight, from most to least. The closer an ingredient is to the beginning of the ingredients statement, the more of it the food contains. A commercial product is 100 percent whole grain if the ingredients statement lists a whole grain as the first ingredient (or lists water as the first ingredient and a whole grain as the second ingredient) and all other grain ingredients are whole grains. The ingredients statements below show examples of 100 percent whole-grain products.

- Ingredients: *Whole-wheat flour,* sugar, wheat gluten. Contains 2% or less of each of the following: honey, salt, yeast, molasses, diacetyl tartaric acid esters of mono-diglycerides (datem), ascorbic acid, mono- and diglycerides, l-cysteine, enzymes.

- Ingredients: Water, *whole-wheat flour, whole oats,* sugar, wheat gluten, yeast, soybean oil, salt, calcium propionate (preservative), monoglycerides, datem and/or sodium stearoyl lactylate, calcium sulfate, citric acid, calcium carbonate, soy lecithin, whey, nonfat milk.

Products that are 100 percent whole grain meet the WGR criteria for the meal patterns for grades K-12 and the WGR criteria for meal patterns for preschoolers.

Grain name does not state “whole”

If the ingredients statement lists a grain name without the word “whole” (such as “wheat flour” instead of “whole wheat flour”), the product is usually not whole grain. However, some products that do not use the word “whole” in their description are whole grains. Examples include berries (e.g., wheat berries), groats (e.g., oat groats), rolled oats and oatmeal (including old-fashioned, quick-cooking, and instant oatmeal), brown rice, brown rice flour, wild rice, quinoa, millet, triticale, teff, amaranth, buckwheat, and sorghum.
In addition, some grains have a Food and Drug Administration (FDA) standard of identity that indicates they are whole grain. These grains include cracked wheat, crushed wheat, whole-wheat flour, graham flour, entire-wheat flour, bromated whole-wheat flour, and whole durum wheat flour.

**Required crediting documentation**

If the ingredients statement does not provide sufficient information to determine if a grain is whole grain, the SFA must obtain a product formulation statement (PFS) from the manufacturer to document the amount of whole grains in the product. For information on PFS forms, see the CSDE’s handouts, *Product Formulation Statements* and *Accepting Processed Product Documentation in the NSLP and SBP*, and the USDA’s handouts, *Product Formulation Statement for Documenting Grains in Child Nutrition Programs* and *Tips for Evaluating a Manufacturer’s Product Formulation Statement*.

To determine if foods made on site contain whole grains, the SFA must review the grain ingredients in the food’s standardized recipe. For more information, see the CSDE’s handout, *Calculation Methods for Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP*. For information on standardized recipes, see the CSDE’s *Standardized Recipe Form for School Nutrition Programs*, and visit the “Crediting Foods Prepared on Site in School Nutrition Programs” section of the CSDE’s Crediting Foods in School Nutrition Programs webpage.

**Crediting Corn Masa, Masa Harina, Corn Flour, and Cornmeal**

Corn products such as tortilla chips, taco shells, and tamales are whole grain if the product is labeled as “whole grain,” or the corn ingredient is treated with lime (nixtamalized). Nixtamalization is a process in which dried corn is soaked and cooked in an alkaline (slaked lime) solution. This process increases the bioavailability of certain nutrients (such as calcium and niacin) and provides a nutritional profile similar to whole-grain corn. Nixtamalized corn is used to make hominy, masa harina (corn flour), corn masa (dough from masa harina), and certain types of cornmeal. Masa is used for making tortilla chips, taco shells, tamales, pupusas, and other popular corn products.

Ingredients labeled as hominy, corn masa, or masa harina credit as whole grains. Some products made with cornmeal or corn flour may require additional information on the PFS to determine if the grain ingredients are nixtamalized; and therefore credit as whole grains. SFAs may use two methods to identify products made with nixtamalized corn.

1. If a product made with corn includes one of two FDA-approved whole grain health claims on its packaging, the corn in the product is nixtamalized and the product provides at least 50 percent whole grain. These health claims are not common.
   - **Low-fat claim:** “Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol, may reduce the risk of heart disease and certain cancers.”
**Crediting Whole Grains in the NSLP and SBP**

- **Moderate-fat claim:** “Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease.”

2. If the ingredients statement indicates that the corn is treated with lime, the corn ingredient is nixtamalized. Examples include “ground corn with trace of lime” and “ground corn treated with lime.” Nixtamalized corn ingredients credit as whole grains.

**Note:** To meet the WGR criteria for grades K-12, any remaining grains in the product must be enriched, and the combined weight of all noncreditable grains cannot exceed the required limit. For more information, see the CSDE’s handout, *Whole Grain-rich Criteria for Grades K-12 in the NSLP and SBP.*

<table>
<thead>
<tr>
<th>Table 1. Whole-grain products and ingredients ¹</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Barley</strong></td>
</tr>
<tr>
<td>Dehulled barley</td>
</tr>
<tr>
<td>Dehulled-barley flour</td>
</tr>
<tr>
<td>Whole barley</td>
</tr>
<tr>
<td>Whole-barley flakes</td>
</tr>
<tr>
<td>Whole-barley flour</td>
</tr>
<tr>
<td>Whole-grain barley</td>
</tr>
<tr>
<td>Whole-grain barley flour</td>
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<tr>
<td>Whole rye</td>
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<tr>
<td>Rye berries ³</td>
</tr>
<tr>
<td>Rye groats</td>
</tr>
<tr>
<td>Sprouted whole rye</td>
</tr>
<tr>
<td>Whole rye</td>
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<tr>
<td>Whole rye</td>
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<td>Whole rye</td>
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<td>Whole rye</td>
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<tr>
<td>Whole rye</td>
</tr>
<tr>
<td>Wheat (white)</td>
</tr>
<tr>
<td>Wheat berries ³</td>
</tr>
<tr>
<td>Wheat berries ³</td>
</tr>
</tbody>
</table>

¹ For more information, see the CSDE’s handout, *Whole Grain-rich Criteria for Grades K-12 in the NSLP and SBP.*
### Table 1. Whole-grain products and ingredients

<table>
<thead>
<tr>
<th>Other grains</th>
<th>Other grains, continued</th>
<th>Other grains, continued</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amaranth</td>
<td>Emmer (farro)</td>
<td>Sprouted buckwheat</td>
</tr>
<tr>
<td>Amaranth flour</td>
<td>Kamut®</td>
<td>Sprouted einkorn</td>
</tr>
<tr>
<td>Buckwheat</td>
<td>Millet</td>
<td>Sprouted spelt</td>
</tr>
<tr>
<td>Buckwheat flour</td>
<td>Quinoa</td>
<td>Teff</td>
</tr>
<tr>
<td>Buckwheat groats</td>
<td>Sorghum (milo)</td>
<td>Teff flour</td>
</tr>
<tr>
<td>Einkorn</td>
<td>Spelt</td>
<td>Triticale</td>
</tr>
<tr>
<td>Einkorn berries</td>
<td>Spelt berries</td>
<td>Triticale flour</td>
</tr>
<tr>
<td>Einkorn flour</td>
<td></td>
<td>Whole-grain spelt flour</td>
</tr>
</tbody>
</table>

1 This list is not all-inclusive.
2 Hominy, masa harina (corn flour), corn masa (dough from masa harina), and cornmeal credit as whole grains if they are nixtamalized. Nixtamalization is a process in which dried corn is soaked and cooked in an alkaline solution. SFAs may need to obtain a PFS to determine if a corn ingredient is nixtamalized. For more information, see “Crediting Corn Masa, Masa Harina, Corn Flour, and Cornmeal” on page 3.
3 Groats and berries are the hulled kernels of cereal grains such as oat, wheat, rye, and barley.
4 Red wheat is the most common kind of wheat in the United States.
5 “Stone ground” describes the process used for making the flour or meal and does not necessarily mean that the product is whole grain. Check the ingredients statement for “whole” in combination with “stone ground.”
6 White whole-wheat products are lighter in color and lack the slightly bitter taste associated with the bran in red wheat. Read labels carefully to be sure products are “white whole wheat” and not “white wheat,” which is not a whole grain.

### Criteria that do not Indicate Whole Grain Content

Menu planners cannot determine if a commercial grain product contains whole grains by using certain statements about grain content on the product’s package; the Whole Grains Council’s Whole Grain Stamp; or the product’s color and fiber content.

### Label statements about grain content

Careful label reading is important because the packaging for grain products can be misleading. Manufacturers often use terms in their product names or labels that make a product appear to contain a significant amount of whole grain when it does not. Table 2 includes some common misleading terms found on product packages. Products with these terms are usually not 100 percent whole grain. They often contain refined flour, or other...
ingredients that are not whole grain, as the first or second ingredient.

### Table 2. Common misleading terms for grains

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Made with whole grains”</td>
<td>These products must have some whole grains but may contain mostly refined flour. The amount of whole grains can vary greatly among different products.</td>
</tr>
<tr>
<td>“Made with whole wheat”</td>
<td>These products must have some whole wheat but may contain mostly refined flour. The amount of whole wheat can vary greatly among different products.</td>
</tr>
<tr>
<td>“Contains whole grain”</td>
<td>These products may contain a small amount of whole grain but usually are mostly refined grains. The amount of whole grains can vary greatly among different products.</td>
</tr>
<tr>
<td>“100% wheat”</td>
<td>All breads made from any part of the wheat kernel are 100 percent wheat, which is not the same as 100 percent whole wheat. “100% wheat” products may contain some whole-wheat flour or may contain only refined flour. Look for the terms “100% whole wheat” or “100% whole grain” to indicate that the product is made from only whole grains.</td>
</tr>
<tr>
<td>“Multigrain” or specifies number of grains, e.g., “seven-grain bread”</td>
<td>These products must contain more than one type of grain, which can include refined grains, whole grains, or both. Some multigrain breads may have enriched flour as the primary ingredient with multiple grains in smaller amounts, while others contain mostly whole grains.</td>
</tr>
<tr>
<td>“Cracked wheat bread”</td>
<td>While cracked wheat is a whole grain, cracked wheat bread may contain refined flour as the primary ingredient with small amounts of cracked wheat.</td>
</tr>
<tr>
<td>“Stone ground” flour or meal</td>
<td>“Stone ground” describes the process used for making the flour or meal. It does not necessarily mean that the product is whole grain. Check the ingredients statement for the term “whole” in combination with “stone ground.”</td>
</tr>
</tbody>
</table>
Whole grain stamp

The Whole Grains Council provides three stamps that manufacturers may use on product packaging to identify foods that contain whole grains. However, the USDA does not allow SFAs to use these stamps to determine if grain products meet the WGR criteria for the grains component. The whole grain stamps indicate that a product is made with or contains 100 percent whole grains, but they do not indicate if all other grains in the product are enriched or if any noncreditable grains comply with the USDA’s limit for noncreditable grains. To determine compliance with the WGR criteria for the grains component, SFAs must review the product’s ingredients statement and packaging and, if necessary, obtain a PFS from the manufacturer.

Color

A product’s color does not indicate whether it contains whole grains. While whole-grain products are usually browner than products made with refined white flour, sometimes the brown color comes from coloring (e.g., caramel coloring) or molasses, not from whole-grain ingredients. Read the ingredients statement or the standardized recipe to determine if the food contains any whole grains.

Fiber content

Whole grains and fiber both provide health benefits, but they are not the same. The fiber content on the Nutrition Facts label is not a good indicator of whether a commercial product contains whole grains. Grain-based foods that are good sources of fiber, such as bran cereal, may contain added fibers, but few or no whole grains. The Nutrition Facts label lists total fiber, which includes naturally occurring fiber and sources added by the manufacturer, such as cellulose, inulin, and chicory root.

Serving Size for Whole-grain Foods

The USDA allows two methods for determining the grain ounce equivalents of a creditable grain product or recipe. SFAs may use either method, but must document how the crediting information was obtained.

- **Method 1 (USDA’s Exhibit A Chart)** is used for commercial grain products and may also be used for standardized recipes that indicate the weight of the prepared (cooked) serving. This method uses the USDA’s chart, *Exhibit A: Grain Requirements for Child Nutrition Programs*, to determine the required weight (groups A-G) or volume (groups H-I) for the appropriate grain group. The required amounts for the grains component are not the same for all Child Nutrition Programs.

  - The CSDE’s handout, *Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP*, lists the Exhibit A grain ounce equivalents that apply to grades K-12 in the NSLP,
Crediting Whole Grains in the NSLP and SBP

SBP, and SSO.

- The CSDE’s handout, *Grains/Breads Servings for Grades K-12 in the ASP*, lists the required Exhibit A grain servings that apply to grades K-12 in the ASP.

- The CSDE’s handout, *Grain Serving Sizes for Preschoolers in the NSLP and SBP*, lists the Exhibit A grain servings that apply through September 30, 2021, to preschoolers in the NSLP, SBP, SSO, and ASP. Effective October 1, 2021, the required preschool grain amounts change to ounce equivalents. Groups F and G are not included because grain-based desserts do not credit as the grains component in the preschool meal patterns.

- **Method 2 (creditable grains)** is used for recipes and may also be used for commercial grain products that have a PFS stating the weight of creditable grains per serving. This method determines the ounce equivalents for creditable grain products and recipes by calculating the total weight (grams) of creditable grains per manufacturer’s serving (from the PFS) or recipe serving (from the quantities listed in the standardized recipe). For some commercial grain products, SFAs must use method 2 (instead of the USDA’s Exhibit A chart) to determine the grain servings or ounce equivalents.

For detailed guidance on both methods, see the CSDE’s handouts, *Calculation Methods for Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP*, *Calculation Methods for Grains/Breads Servings for Grades K-12 in the ASP*, and *Calculation Methods for Grain Servings for Preschoolers in the NSLP and SBP* (through September 30, 2021).

**Considerations for Reducing Choking Risks for Young Children**

Children younger than 4 are at the highest risk of choking. Examples of grain foods that may cause choking include hard pretzels; pretzel chips; corn chips; breakfast cereals that contain nuts, whole-grain kernels (such as wheat berries), and hard chunks (such as granola); and crackers or breads with seeds, nut pieces, or whole-grain kernels. Consider children’s age and developmental readiness when deciding what types of grain foods to offer in preschool menus. This consideration is also important for children with a disability that requires dietary restrictions. For additional guidance, visit the “Choking Prevention” section of the CSDE’s *Food Safety for Child Nutrition Programs* webpage.
Resources

Adding Whole Grains to Your CACFP Menu – Handouts, training slides, and webinars in English and Spanish (USDA webpage):
https://www.fns.usda.gov/tn/adding-whole-grains-your-cacfp-menu

Afterschool Snack Program (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Afterschool-Snack-Program

Afterschool Snack Program Handbook (CSDE)

Calculating Weekly Percentage of Whole Grain-rich Menu Items in the NSLP and SBP (CSDE):
https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/PercentageWGRCalculationSNP.xlsx

Calculation Methods for Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP (CSDE):

Calculation Methods for Grain Servings for Preschoolers in the NSLP and SBP (CSDE):

Calculation Methods for Grains/Breads Servings for Grades K-12 in the ASP (CSDE):

Choking Prevention (CSDE’s Food Safety for Child Nutrition Programs webpage):
https://portal.ct.gov/SDE/Nutrition/Food-Safety-for-Child-Nutrition-Programs/Documents#ChokingPrevention

Comparison of Meal Pattern Requirements for the Grains Component in the School Nutrition Programs (CSDE):

Crediting Breakfast Cereals for Grades K-12 in the NSLP and SBP (CSDE):

Crediting Breakfast Cereals for Preschoolers in the NSLP and SBP (CSDE):

Crediting Enriched Grains in the NSLP and SBP (CSDE):
Crediting Whole Grains in the NSLP and SBP

Grain Ounce Equivalents for Grades K-12 in the NSLP and SBP (CSDE):

Grain Ounce Equivalents for Preschoolers in the NSLP and SBP (Effective October 1, 2021) (CSDE):

Grain Servings for Preschoolers in the NSLP and SBP (through September 30, 2021) (CSDE):

Grain-based Desserts in the CACFP – Handouts and webinars in English and Spanish (USDA):
https://www.fns.usda.gov/tn/grain-based-desserts-cacfp

Grains Component for Grades K-12 (CSDE webpage):

Grains Component for Preschoolers (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs/Related-Resources#Grains

Grains/Breads Component for Grades K-12 in the ASP (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Afterschool-Snack-Program/Documents#GrainsBreadsK12

Grains/Breads Servings for Grades K-12 in the ASP (CSDE):

How to Identify Creditable Grains for Preschoolers in the NSLP and SBP (CSDE):

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs/Documents

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs

Menu Planning Guide for Preschoolers in the NSLP and SBP (CSDE):

Menu Planning Guide for School Meals for Grades K-12 (CSDE):

Menu Planning Resources for School Meals (CSDE):
Product Formulation Statement for Documenting Grains in Child Nutrition Programs (USDA):

Product Formulation Statement for Documenting Grains/Breads Servings in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks (USDA):

Product Formulation Statements (CSDE):

Resources for the Preschool Meal Patterns (CSDE):

USDA Memo CACFP 09-2018: Grain Requirements in the Child and Adult Care Food Program; Questions and Answers:

USDA Memo CACFP 16-2017: Grain-Based Desserts in the Child and Adult Care Food Program:

USDA Memo SP 23-2019, CACFP 10-2019 and SFSP 09-2019: Crediting Popcorn in the Child Nutrition Programs:
https://www.fns.usda.gov/cn/crediting-popcorn-child-nutrition-programs

USDA Memo SP 30-2012: Grain Requirements for the National School Lunch Program and School Breakfast Program:

USDA Memo SP 34-2019, CACFP 15-2019 and SFSP 15-2019: Crediting Coconut, Hominy, Corn Masa, and Masa Harina in the Child Nutrition Programs:

Whole Grain-rich Criteria for Grades K-12 in the NSLP and SBP (CSDE):

Whole Grain-rich Criteria for Preschoolers in the NSLP and SBP (CSDE):
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1. mail: U.S. Department of Agriculture
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410;
2. fax: (202) 690-7442; or
3. email: program.intake@usda.gov.

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