

# Requirements for Field Trip Meals in the National School Lunch Program and School Breakfast Program

The U.S. Department of Agriculture (USDA) requires that meals reimbursed under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) must be consumed on site, unless they are served on school-supervised field trips that are part of the curriculum, as defined by the Connecticut State Department of Education (CSDE). Field trips cannot be extracurricular events.

School food authorities (SFAs) must ensure that food service and non-food service staff (such as teachers, teacher aides, and other applicable staff) involved with field trips understand and implement the USDA's requirements for off-site reimbursable meals. Meals served off-site must strictly adhere to Hazard Analysis and Critical Control Point (HACCP) procedures to avoid potential food safety issues. The CSDE strongly recommends that SFAs develop standard operating procedures (SOP) for field trip meals.

## Availability of Field Trip Meals

SFAs may choose whether to offer portable field trip meals for students. If offered, field trip meals must be available to all students, regardless of eligibility for free, reduced-price, or paid meals; and must be offered at regular meal prices.

SFAs should be aware of students with special dietary needs (such as food allergies) who request field trip meals. Field trip meals may require collaborative planning with school food service staff, the school nurse, and the child's parents or guardians to identify meal modifications that meet the child's dietary needs and comply with the food safety requirements for off-site meals.

## Common Compliance Issues with Field Trip Meals

During recent Administrative Reviews of the NSLP and SBP, the Connecticut State Department of Education's (CSDE) school nutrition programs staff has observed multiple common compliance issues with field trips. These compliance issues include:

- lack of point-of-service (POS) meal counts, such as using field trip attendance as the meal count;
- lack of SOP for field trips;
- lack of HACCP procedures;
- not maintaining proper cold-holding temperatures;
- not complying with the meal pattern for the grade group;



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- not offering the full serving (minimum daily amount) of all components (such as  $\frac{3}{4}$  cup of vegetables for grades K-5 at lunch);
- not including milk or not offering a variety of milk;
- lack of monitoring by the SFA to ensure compliance, including reimbursable meals, meal counts, and leftover meals or foods (including milk); and
- lack of proper training for food service and non-food service staff, including annual civil rights training.

This document provides guidance for SFAs on the USDA's requirements for field trips and how to avoid compliance issues.

## Overview of Requirements for Reimbursable Field Trip Meals

Field trip meals must meet the criteria below to qualify for NSLP and SBP reimbursement.

1. Field trip meals must meet the meal pattern requirements for the appropriate grade group. For more information, refer to [“Meal Pattern Compliance for Grades K-12”](#) and [“Meal Pattern Compliance for Preschoolers”](#) in this document.
2. SFAs must record field trip meals on the school's daily food production record. For more information on production records, review the CSDE's resource, [Requirements for Production Records in School Nutrition Programs](#), and visit the CSDE's [Production Records for School Nutrition Programs](#) webpage.
3. Field trip lunches must be served between 10:00 a.m. and 2:00 p.m. Field trip breakfasts must be served at or close to the beginning of the child's day at school. For more information, refer to [“Timing of Meals”](#) in this document.
4. SFAs must develop a local process to accurately count meals served during field trips. Field trip staff must conduct POS meal counts for field trip meals. For more information, refer to [“Meal Counts”](#) in this document.
5. School food service staff and field trip staff (such as teachers, teacher aides, other school staff, parents, and volunteers) must follow appropriate food safety practices for field trip meals. For more information, refer to [“Food Safety”](#) in this document.



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## Meal Pattern Compliance for Grades K-12

SFAs must ensure that all field trip meals for grades K-12 meet the NSLP and SBP meal pattern requirements for the appropriate grade group (K-5, 6-8, or 9-12). The meal pattern requirements for field trip meals are summarized below.

- Field trip meals must contain all meal components in the minimum required amounts. OVS should not be implemented on field trips due to the difficulty of ensuring that non-food service staff can accurately identify reimbursable meals. The USDA does not require OVS as part of field trip meal service.
- The meal patterns for grades K-12 require daily and weekly amounts of five food components for lunch (milk, fruits, vegetables, grains, and meat/meat alternates) and three food components for breakfast (milk, fruits (including vegetable substitutions), and grains. At breakfast, the meat/meat alternates component may be offered in place of the grains component after offering 1 ounce equivalent (oz eq) of grains. For example, a breakfast menu that includes a 1-oz eq whole-grain bagel may also include 2 tablespoons of peanut butter (1 oz eq of meat/meat alternates). Meat/meat alternate substitutions credit toward the daily and weekly servings of grains.
- Lunch and breakfast menus (including field trip meals) must meet the USDA's weekly dietary specifications (nutrition standards) for calories, saturated fats, and sodium. In addition, all food products and ingredients used to prepare school meals must contain zero grams of trans fats per serving.
- Field trip meals must always include a variety (at least two different choices) of milk. At least one choice must be unflavored. For school year 2020-21, the allowable types of milk include unflavored low-fat (1%) milk and unflavored or flavored fat-free milk. SFAs cannot offer juice or water as a substitute instead of milk unless a child has a disability that specifically requires this substitution, as documented by a medical statement signed by the child's recognized medical authority. For more information, review the CSDE's resource, [Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs](#), and visit the CSDE's [Special Diets in School Nutrition Programs](#) webpage.
- Field trip lunches are not required to include the same vegetable subgroup as the cafeteria lunch menu. SFAs have the option to offer a different vegetable subgroup or a different vegetable from the same subgroup. For example, if the cafeteria lunch menu includes sweet potatoes, the field trip lunch may include a different vegetable from the same subgroup (e.g., carrot sticks) or a vegetable from a different subgroup (e.g., celery sticks). For information, on the vegetable subgroups, review the CSDE's resource, [Vegetable Subgroups in the NSLP](#).

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- SFAs must include field trip meals when determining if the planned lunch or breakfast menu meets the weekly requirements for the grains and meat/meat alternates components; the weekly vegetable subgroups (lunch only); and the weekly dietary specifications (nutrition standards) for calories, saturated fat, and sodium.

For more information on the NSLP and SBP meal patterns and dietary specifications for grades K-12, visit the CSDE's [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage and review the CSDE's publication, *Menu Planning Guide for School Meals for Grades K-12*.

## Meal Pattern Compliance for Preschoolers

SFAs must ensure that all field trip meals for preschoolers meet the NSLP and SBP meal pattern requirements for the appropriate age group (1-2 or 3-4).

- The meal patterns for preschoolers require daily amounts of five food components for lunch (milk, fruits, vegetables, grains, and meat/meat alternates) and three food components for breakfast (milk, fruits and vegetables, and grains). Unlike the meal patterns for grades K-12, the preschool meal patterns do not require weekly servings of the meal components or weekly dietary specifications. However, the preschool meal patterns require nutrition standards for some specific foods, such as sugar limits for yogurt and breakfast cereals. For more information, review the CSDE's resources, *Crediting Yogurt for Preschoolers in the NSLP and SBP* and *Crediting Breakfast Cereals for Preschoolers in the NSLP and SBP*.
- Field trip meals must always include milk. The NSLP and SBP meal patterns for preschoolers require unflavored whole milk for age 1 and unflavored low-fat (1%) or fat-free milk for ages 2-4. Flavored milk cannot be served. SFAs cannot offer juice or water as a substitute instead of milk unless a child has a disability that specifically requires this substitution, as documented by a medical statement signed by the child's recognized medical authority. For more information, review the CSDE's resource, *Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs*, and visit the CSDE's [Special Diets in School Nutrition Programs](#) webpage.
- Field trip meals must contain all meal components in the minimum required amounts. OVS is not allowed for preschool meals.

For information on the NSLP and SBP meal patterns for preschoolers, visit the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage and review the CSDE's publication, *Menu Planning Guide for Preschoolers in the NSLP and SBP*.

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## Meal Counts

The USDA requires that NSLP and SBP meal counts for all grades must be determined at the POS. For field trips, the POS is the point in the meal service at the field trip site where staff can accurately determine that they have served all of the required components for a reimbursable meal to the child. The USDA does not allow any other methods to determine field trip meal counts, such as student field trip attendance, student orders for field trip meals, the number of meals sent on the field trip, or the number of meals returned from the field trip. Meal counts must be taken by trained staff. Students cannot take meal counts.

## Acceptable POS meal count procedures

SFAs must develop a local process to obtain accurate POS meal counts for field trips. The examples below show some acceptable procedures for field trip meal counts.

- The teacher supervising the field trip has an attendance roster of the students on the field trip. During mealtime at the field trip site, the teacher checks off the student's name after verifying that the student has received all of the components for a reimbursable meal. The teacher returns the completed student roster to the cafeteria after the field trip. The cafeteria manager reviews the information on the completed student roster by comparing the meal counts to the number of leftover meals. The cafeteria manager adds the number of field trip meals to the school's lunch counts for that day.
- Students come through the cafeteria serving line and purchase a bag meal at the POS prior to leaving for the field trip. Bag meals that contain potentially hazardous foods (PHFs) are stored in a transport container that can maintain temperatures at 41°F or below. Milk choices are transported separately in a container that can maintain temperatures at 41°F or below.

If transport containers cannot maintain 41°F or below, students must eat their meals within specific timeframes (see "[Meal service](#)" in this document) or the bag meal must include only shelf-stable foods and milk (aseptically packaged) that do not require refrigeration. Examples of shelf-stable foods include nut butters (e.g., peanut butter and sunflower seed butter), breads and crackers, whole fresh fruit, pre-packaged, shelf-stable fruit (such as fruit cups and applesauce), carrot and celery sticks, and cherry tomatoes.

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## Meal count instructions

The SFA's SOP for field trip meals should include clear meal count instructions for field trip staff that indicate how to identify reimbursable meals, how to take POS meal counts, how to handle leftover meals or foods (including milk), and a plan for informing substitutes of the requirements for field trip meals. As a best practice, SFAs should include these instructions with the delivery of the field trip meals. This helps everyone understand the required procedures and prevents staffing variations (such as teacher absences, substitutes, and parent volunteers) from resulting in noncompliant meals.

## Timing of Meals

The NSLP regulations ([7 CFR 2010.10 \(l\)](#)) specify that schools and institutions participating in the NSLP must serve lunches during the period of 10:00 a.m. to 2:00 p.m. The SBP regulations ([7 CFR 220.2](#)) require that breakfast must be served at or close to the beginning of the child's day at school. These requirements apply to all NSLP and SBP meals, including field trip meals. For more information on the requirements for lunch periods in the NSLP, see [CSDE Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#) and [CSDE Operational Memorandum No. 10-19: Requirements for Lunch Periods in the NSLP](#).

## Staff Training

SFAs must provide appropriate job-specific training for all employees, including non-food service staff, whose responsibilities include duties related to the operation of school nutrition programs. For example, teachers and other applicable staff who conduct field trip meal counts must receive appropriate training to ensure they perform their jobs effectively and in compliance with the USDA's regulations. For meal pattern training resources, visit the CSDE's [Meal Pattern Training for School Nutrition Programs](#) webpage.



In addition, the USDA requires annual civil rights training for all staff who interact with NSLP and SBP applicants or participants, including staff involved with field trip meals. The CSDE's PowerPoint presentation, *Civil Rights: Your Responsibilities in the School Nutrition Programs PowerPoint Presentation*, provides civil rights training for schools and is available on the CSDE's [Civil Rights for Child Nutrition Programs](#) webpage.

SFAs must log all staff training on the SFA's annual professional standards tracking log. This includes training for field trip staff whose responsibilities include duties related to the operation of



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school nutrition programs. For more information, review the CSDE's [Professional Standards Tracker Log](#), and the USDA's publication, [Guide to Professional Standards for School Nutrition Programs](#), and visit the CSDE's [Professional Standards for School Nutrition Professionals](#) webpage.

## Food Safety

The USDA regulations ([7 CFR 210.13\(c\)](#)) require SFAs to develop a written food safety plan for compliance with HACCP. HACCP is a systematic approach to reduce the risk of foodborne hazards by focusing on each step of the food preparation process. For more information, review the USDA's publication, [Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles](#).

Field trip meals must comply with HACCP procedures. The greatest food safety concern for field trip meals is ensuring that PHFs stay at proper temperatures during transport and service. PHFs are foods that require temperature control because they are capable of supporting rapid bacterial growth that can lead to foodborne illness. PHFs include milk and milk products; meat (beef, pork, lamb, and poultry); fish; shellfish; shell eggs; cut melons; cut tomatoes; cut leafy greens; baked potatoes; cooked rice, beans, and vegetables; tofu or other soy proteins; and sprouts and sprout seeds.

The SFA's SOP for field trip meals should include appropriate food safety procedures for PHFs during meal preparation, transport, and service. School food service staff and field trip staff (such as teachers, other school staff, parents, and volunteers) must work together to ensure that field trip meals are safe to eat. The following practices help to ensure the safety of field trip meals. For SOP examples, visit the Institute of Child Nutrition's (ICN) [Standard Operating Procedures](#) webpage.



## Meal preparation

- Ensure that school food service staff follow all applicable HACCP procedures during the preparation and storage of field trip meals.
- Chill PHFs that will be served cold before placing in transport containers. Examples include sandwiches (e.g., turkey, ham, roast beef, tuna salad), cut fresh fruit and vegetables, especially melons, tomatoes, and leafy greens (excludes whole fruit and pre-packaged, shelf-stable fruit such as fruit cups and applesauce), and dairy products (e.g., milk, yogurt, and cheese).
- If the transport containers cannot maintain milk at 41°F or below, use shelf-stable (aseptic) milk that does not require refrigeration.

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## Meal transport

- Maintain PHFs at appropriate temperatures during transport and storage. Cold foods must be kept at 41°F or below. Hot foods must be kept at 135°F or above. For more information, review the ICN's sample SOP, *Hot and Cold Holding for Time Temperature Control for Safe Foods*.
- Transport PHFs in insulated portable food transport containers, such as coolers. Clean and sanitize transport containers before use. Use ice or cold packs to maintain the temperature of PHFs. Keep the containers tightly closed until meals are distributed. For more information, review the ICN's sample SOP, *Transporting Food to Remote Sites (Satellite Kitchens)*.
- Store transport containers and foods out of direct sunlight and away from engines.

## Meal service

- Ensure that students eat meals at the appropriate time to ensure correct implementation of time and temperature controls for food safety. Cold foods must be kept at 41°F or below; or eaten within four hours if stored below 70°F; or eaten within one hour if kept at temperatures above 90°F.
- Wash hands prior to distributing meals. Alcohol-based hand sanitizer is not a suitable substitute for handwashing because it is not effective against foodborne viruses and allergens. For more information, review the ICN's sample SOP, *Washing Hands*.
- Use clean disposable gloves or utensils when distributing any unwrapped or unpackage ready-to-serve food, such as whole pieces of fresh fruit or sandwiches packaged in bulk containers. For more information, review the ICN's sample SOP, *Using Suitable Utensils When Handling Ready-to-Eat Foods*.
- Have students thoroughly wash their hands before receiving meals and eating. To avoid potential allergic reactions, ask students not to share foods.
- Discard all leftover food items returned in coolers from the field trip.





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## Best Practices

The CSDE strongly recommends the following best practices to ensure compliance with the USDA's requirements for field trip meals in the NSLP and SBP.

- Develop a SOP that includes clear written procedures regarding the requirements for field trip meals. The SOP should address:
  - how students provide field trip orders to the cafeteria;
  - appropriate food safety procedures for preparing, transporting, storing, and serving field trip meals, including temperature control, handwashing, and proper food handling procedures during transport and meal service;
  - how to identify reimbursable meals;
  - instructions for conducting field trip POS meal counts;
  - how to handle leftover meals or foods (including milk); and
  - a plan for informing substitutes of the requirements for field trip meals.
- Disseminate the district's SOP for field trip meals to food service staff and all applicable field trip staff, including teachers, teacher aides, other school staff, parents, and volunteers; and post on the SFA's website.
- Provide regular training (at least annually) for all food service and non-food service staff involved with field trip meals.
- Include POS meal count instructions for field trip staff with the delivery of the field trip meals. For example, SFAs could laminate the meal count instructions and attach to the food transport containers.
- Use clear signage on the transport containers to help field trip staff identify the required meal components.
- Reinforce proper procedures for field trip meals through various communication channels, such as staff meetings, e-mails, employee handbooks, written instructions, and the SFA's website.



For additional guidance and technical assistance on implementing field trip meals, contact your [county consultant](#) for school nutrition programs.

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## Resources

Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/MilkSubstitutesSNP.pdf>

Civil Rights for Child Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Civil-Rights-for-Child-Nutrition-Programs>

Crediting Foods for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Crediting-Foods-in-School-Nutrition-Programs>

CSDE Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students:

<https://portal.ct.gov/-/media/SDE/Circular-Letters/circ07-08/C9.pdf>

CSDE Operational Memorandum No. 10-19: Requirements for Lunch Periods in the NSLP:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2019/OM10-19.pdf>

FNS Instruction 786-8 (rev. 1) Reimbursement for Off-Site Meal Consumption:

<https://portal.ct.gov/-/media/SDE/Nutrition/FNSinstruction/786-8.pdf>

Food Safety Standard Operating Procedures (Institute of Child Nutrition webpage):

<https://theicn.org/icn-resources-a-z/standard-operating-procedures/>

Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles (USDA):

[https://fns-prod.azureedge.net/sites/default/files/Food\\_Safety\\_HACCPGuidance.pdf](https://fns-prod.azureedge.net/sites/default/files/Food_Safety_HACCPGuidance.pdf)

Guide to Professional Standards for School Nutrition Programs (USDA):

[https://fns-prod.azureedge.net/sites/default/files/tn/ps\\_guide.pdf](https://fns-prod.azureedge.net/sites/default/files/tn/ps_guide.pdf)

HACCP-Based SOPs: Hot and Cold Holding for Time Temperature Control for Safe Foods (ICN):

<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105686/hot-and-cold-holding-for-time-temperature-control-for-safe-foods.docx>

HACCP-Based SOPs: Transporting Food to Remote Sites (Satellite Kitchens) (ICN):

<https://theicn.org/resources/181/food-safety-standard-operating-procedures/105731/transporting-food-to-remote-sites-satellite-kitchens.docx>

Meal Counting and Claiming for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Counting-and-Claiming-for-School-Nutrition-Programs>

Meal Pattern Training for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

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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):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/MPGpreschool.pdf>

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

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals>

National School Lunch Program (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/National-School-Lunch-Program>

Production Records for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Production-Records-for-School-Nutrition-Programs>

Professional Standards for School Nutrition Professionals (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Professional-Standards-for-School-Nutrition-Professionals>

Professional Standards Tracker Log (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/ProfStdTracker.xlsx>

Requirements for Production Records in School Nutrition Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/ProdRecord/ProductionRecords.pdf>

School Breakfast Program (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/School-Breakfast-Program>

Special Diets in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs>

Standard Operating Procedures (ICN webpage):

<https://theicn.org/icn-resources-a-z/standard-operating-procedures/>

USDA Memo SP 38-2019: Meal Requirements under the National School Lunch Program and School Breakfast Program: Questions and Answers for Program Operators:

<https://fns-prod.azureedge.net/sites/default/files/resource-files/SP38-2019os.pdf>

Vegetable Subgroups in the NSLP (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/VegetableSubgroupsNSLP.pdf>

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For more information, visit the CSDE's [Meal Counting and Claiming for School Nutrition Programs](#) webpage or contact the [school nutrition programs staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at [https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/MealCount/RequirementsFieldTripMealsNSLP\\_SBP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/MealCount/RequirementsFieldTripMealsNSLP_SBP.pdf).

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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](mailto:program.intake@usda.gov).

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