### School Year 2024-25 (July 1, 2024, through June 30, 2025)

This guidance applies to the U.S. Department of Agriculture's (USDA) meal patterns for grades K-12 and preschool (ages 1-5) in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, and Afterschool Snack Program (ASP) of the NSLP. The SSO follows the NSLP and SBP meal patterns. For information on the NSLP, SBP, and ASP meal pattern and crediting requirements for grades K-12, visit the Connecticut State Department of Education's (CSDE) Meal Patterns for Grades K-12 in School Nutrition Programs webpage and Crediting Foods in School Nutrition Programs webpage. For information on the preschool meal pattern and crediting requirements, visit the CSDE's Meal Patterns for Preschoolers in School Nutrition Programs webpage.

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### **Required Crediting Documentation for Processed Foods**

The meal patterns for the school nutrition programs require specific portions of five meal components for each meal and grade group: meats/meat alternates (MMA), grains, vegetables, fruits, and milk. The USDA requires that school food authorities (SFAs) must be able to document how processed foods credit toward these meal components in reimbursable meals and afterschool snacks.

Processed foods are commercially prepared foods and beverages with added ingredients. Some examples include:

- combination foods that contain more than one meal component, e.g., pizza, chicken nuggets, cheese ravioli, hummus and other bean dips, fruit and yogurt smoothies, fruit-filled pastries, and trail mixes with dried fruits and nuts;
- foods with added liquids, binders, and extenders, e.g., deli meats, hotdogs, and sausages (refer to the CSDE's resources, *Crediting Deli Meats in the School Nutrition Programs* and *Crediting Commercial Meat/Meat Alternate Products in the School Nutrition Programs*);
- dried meat, poultry, and seafood products, e.g., jerky and summer sausages;
- foods that are alternate protein products (APPs) or contain APPs (refer to the CSDE's resource, *Requirements for Alternate Protein Products in the School Nutrition Programs*);
- fruits and vegetables with added ingredients, e.g., breaded onion rings, french fries, hash brown patties, coleslaw, and dried soup mix; and
- whole grain-rich (WGR) or enriched grain products that also contain noncreditable grains (e.g., oat fiber, corn fiber, wheat starch, corn starch, and modified food starch, including potato, legume, and other vegetable flours), such as muffins, crackers, breakfast cereals, and grain-based-deserts like cookies, graham crackers, granola bars, and pastries.

These types of foods require specific documentation to credit toward the meal components of the school meal patterns. This documentation must be obtained prior to purchasing, serving, and claiming the food product in reimbursable meals and afterschool snacks.

SFAs are ultimately responsible if a menu does not meet the meal pattern requirements. The USDA requires crediting documentation to demonstrate how food items meet the requirements of the meal pattern regulations.

## **Overview of PFS Forms**

A PFS is a document developed by manufacturers that provides specific information about how a product credits toward the USDA's meal patterns for the Child Nutrition Programs (refer to figure 1). These forms generally include a detailed explanation of what the product contains and indicate the amount of each ingredient in the product by weight.

While only processed products that contain at least ½ oz eq of MMA are eligible for CN labels, a PFS can be used to document the meal pattern contribution for any processed food product. However, unlike CN labels, the information on PFS forms might vary among manufacturers because these forms are not reviewed, approved, or monitored by the USDA.

#### When a PFS is required

SFAs must obtain a PFS from the manufacturer for all commercial processed products without a Child Nutrition (CN) label that are not listed in the USDA's *Food Buying Guide for Child Nutrition Programs* (FBG). For guidance on CN labels, refer to the CSDE's resource, *Using Child Nutrition (CN) Labels in the School Nutrition Programs*.

To avoid additional burdens on food industry partners, SFAs cannot request a PFS or additional crediting information when a valid CN label or watermarked CN label is provided.

Processed foods without a PFS or CN label do not credit in school meals and afterschool snacks.

#### Verifying PFS forms for accuracy

SFAs are responsible for verifying that the calculations and meal pattern contribution statement on a manufacturer's PFS are accurate. Prior to purchasing, serving, and claiming the food product in school meals and afterschool snacks, SFAs must review the PFS to ensure that it includes each required element and that the crediting calculations are correct. If any information is missing or incorrect, SFAs must request a revised PFS from the manufacturer, with supporting documentation if needed.

The USDA encourages careful review of product literature. SFAs are accountable for ensuring that reimbursable meals and afterschool snacks meet the meal pattern requirements.

#### Figure 1. Sample PFS for a commercial MMA product

#### Product Formulation Statement for Documenting Meats/Meat Alternates (M/MA) in Child Nutrition Programs

Program operators should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative.

Product Name: Grilled Chicken Nuggets	Code No.: 123456
Manufacturer: ABC Chicken Company	Serving Size: _4 nuggets (2.6 ounces)

#### I. Meats

Fill out the chart below to determine the creditable amount of Meats.

DESCRIPTION OF CREDITABLE MEAT INGREDIENT PER FOOD BUYING GUIDE (FBG)	OUNCES PER RAW PORTION OF CREDITABLE MEAT INGREDIENT A	MULTIPLY	FBG YIELD <sup>1</sup> B	CREDITABLE AMOUNT A x B
Boneless chicken	2.88 ounces	x	.7	2.016
		x		
		x		
		C. Total Credit	able Meats Amount	5 2.016

<sup>1</sup> FBG yield = Additional Information column.

Total weight (per portion) of product as purchased 2.6 ounces

Total creditable amount of product (per portion). (Reminder: total creditable amount (per portion) cannot exceed the total weight (per portion).) 2 ounce equivalents

I certify that the above information is true and correct and that a <u>2.6</u> ounce serving of the above product (ready for

serving) contains 2\_\_\_\_\_ ounces of equivalent meat/meat alternate when prepared according to directions.

I further certify that any APP used in the product conforms to the Food and Nutrition Service Regulations (7 CFR Parts 210,

220, 225, 226, Appendix A) as demonstrated by the attached supplier documentation.

John Smith	President	President		
Signature	Title			
John Smith	12/09/2022	(800) 123-4567		
Printed Name	Date	Phone Number		

## **Required PFS Information**

A PFS is an official certified document of the company. It must be on company letterhead and signed by a person of authority in the company, such as the quality control manager or the appropriate staff in nutrition or research and development. This signature may be handwritten, stamped, or electronic.

PFS forms must include specific elements to be acceptable as crediting documentation for the school nutrition programs. The product's label with the ingredients statement must also be attached.

PFS forms that do not contain the required elements cannot be accepted as crediting documentation. SFAs must request a revised PFS from the manufacturer, with supporting documentation if needed.

Guidance on the required PFS elements is below.

1. **Product name:** The product name on the PFS must match or have a similar description to the name on the product label. Some examples are below.

Name on label	Name on PFS	Acceptable match?
Crispy breaded square chicken strips	Breaded chicken strips	Yes. The description is similar.
Crispy breaded square chicken strips	Chicken	No. "Chicken" does not indicate the type or form of the food, i.e., that the chicken is breaded or in the form of strips.
Early Harvest Green Beans	Beans	No. "Beans" does not sufficiently match the description on the product label because it does not indicate the type of beans.
Early Harvest Green Beans	Green beans	Yes. This matches the type of beans listed on the product label.

- 2. **Product code:** A unique identifier assigned by the manufacturer that may include numbers, letters, or a combination of both.
- 3. Serving or portion size: The serving size stated on the PFS should represent the amount of the product as purchased or ready for serving. This is the amount of food needed to provide the creditable amount stated on the PFS. The serving size may be stated as a weight or measure. Servings listed as measures should also include the weight of the measure. Some examples include one beef patty (2 ounces or 56 grams) and 2 pancakes (50 grams).
- 4. **Creditable ingredients:** The creditable ingredients must match or have a similar description to the ingredients listed on the product's label and a food item in the FBG.
  - The PFS must provide information about the creditable ingredients, including the specific type or form, e.g., fresh, frozen, canned, or dry.
  - The PFS must include the percentage of fat for ground beef or ground pork ingredients because this directly correlates to the cooking yield. The percentage of fat is not required for ground poultry, such as turkey and chicken.
  - If the manufacturer claims that the product provides a higher creditable amount than the amount listed in the FBG, the PFS must clarify all credited ingredients and demonstrate how the product provides that creditable amount according to the USDA's regulations, guidance, or policies.
- 5. **Information demonstrating meal pattern contribution:** The PFS must demonstrate how the creditable ingredients contribute to the USDA's meal patterns for the school nutrition programs.
  - Rounding rules: The manufacturer's crediting calculations must follow the USDA's rounding rules for the meal pattern contribution. All creditable amounts must round down to the nearest creditable amount for the specific meal component, i.e., ¼ oz eq for MMA and grains and ¼ cup for fruits and vegetables. For example, 1.49 oz eq of grains credit as 1.25 oz eq and 2½ tablespoons of vegetables credit as 2 tablespoons (¼ cup).
  - **Product weight versus creditable amount:** The creditable amount cannot exceed the total weight of the product. For example, a hamburger that weighs 1½ ounces cannot credit as 2 oz eq of the MMA component.

• Visible meal components: The creditable meal components in the finished product must be visible (recognizable). For example, to credit toward the MMA component, the product must have a visible meat or meat alternate (such as a sausage link, beans, cheese, or peanut butter) and the PFS must specify the method for crediting these items.

**Note:** Unrecognizable ingredients do not credit. Some examples include peanut butter in smoothies, pureed tofu in soups, applesauce in muffins, and pureed fruits and vegetables foods other than smoothies. The USDA's intent for this requirement is to ensure that children can easily identify the foods in reimbursable meals and afterschool snacks. The USDA emphasizes the importance of the nutrition education aspect of the Child Nutrition Programs, which includes the goal of helping children easily recognize the key food groups that contribute to a healthy meal.

Supporting documentation for APPs: The PFS for products that contain APPs must provide supporting documentation to indicate that these ingredients meet the USDA's APP requirements (Appendix A of the NSLP and SBP regulations). Acceptable documentation includes a CN label, or a PFS from the manufacturer with supporting documentation on company letterhead that the APP ingredient meets the USDA's requirements (refer to the sample documentation on page 6 of the USDA's Questions and Answers on Alternate Protein Products). For additional guidance, refer to the CSDE's resource, Requirements for Alternate Protein Products in the School Nutrition Programs.

PFS forms that do not contain the required elements cannot be accepted as crediting documentation. For more detailed guidance, refer to the CSDE's resource, *Using Product Formulation Statements in the School Nutrition Programs*.

Manufacturers are responsible for ensuring that commercial products are processed to meet the meal pattern contribution stated on the PFS. SFAs are responsible for verifying the PFS form's crediting information before serving the product and maintaining this documentation on file for the CSDE's Administrative Review of the school nutrition programs.

## **Guidance for Reviewing PFS Forms**

Training on PFS forms is provided in "Module 6: Meal Pattern Documentation" of the CSDE's training program, *What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12.* For guidance on how to review a grain PFS, refer to the CSDE's *When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs.* Additional guidance on PFS forms is available in the "Product Formulation Statements" section of the CSDE's Crediting Foods in School Nutrition Programs webpage and Meal Patterns for Preschoolers in School Nutrition Programs webpage.

### **Storing PFS Forms**

SFAs must maintain PFS forms and crediting documentation on file in accordance with the records retention requirements for the school nutrition programs (refer to the CSDE's resource, *Records Retention Requirements for the School Nutrition Programs*). This documentation must be current.

The CSDE recommends maintaining PFS forms in a designated binder or folder for easy reference. Electronic copies of PFS forms should be stored in an easily accessible electronic folder. This documentation must be available for the Administrative Review of the school nutrition programs.



## **USDA PFS Forms**

The USDA's Food Manufacturers/Industry webpage provides PFS templates for the MMA, grains, fruits, and vegetables components, and resources to assist SFAs with evaluating the accuracy of a PFS. These resources are listed below.

Manufacturers are not required to use the USDA forms. However, alternate PFS forms must include all required information from the USDA forms.

Manufacturers may modify the USDA's PFS forms for various types of commercial products. For example, a PFS for cheese pizza could include crediting information for the vegetables component (tomato sauce) in addition to the MMA component (cheese) and grains component (crust). Manufacturers may choose to use one PFS to document the crediting information for each meal component but must clearly identify how each component contributes to the meal pattern requirements. The PFS must include the information needed for SFAs to determine how the product credits in the school nutrition programs.

Through June 30, 2025, the NSLP, SBP, and ASP meal patterns for grades K-12 and preschoolers have different requirements. The applicable USDA PFS forms for each program are indicated below. Commercial products with appropriate crediting documentation on the PFS forms for grades K-12 in the NSLP and SBP also credit for grades K-12 in the ASP and preschoolers in the NSLP, SBP, and ASP.

#### PFS forms for MMA

This PFS is used to document the oz eq of MMA in one serving of a commercial product. This form is the same for all school nutrition programs and grade groups.

- Product Formulation Statement (Product Analysis) for Meat/Meat Alternate (M/MA) Products in Child Nutrition Programs (USDA): https://fns-prod.azureedge.us/sites/default/files/resource-files/PFS\_Meats-Meat\_ Alternates\_Fillable\_508.pdf
- Questions and Answers on Alternate Protein Products (APP) (USDA): https://www.fns.usda.gov/cn/questions-and-answers-alternate-protein-products
- Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements (Product Analysis) for Meat/Meat Alternate (M/MA) Products https://fns-prod.azureedge.us/sites/default/files/reviewer\_checklist.pdf

#### PFS forms for vegetables and fruits

These PFS forms are used to document the cups of fruits and vegetables in one serving of a commercial product. They also include the meal pattern contribution of the five vegetable subgroups (dark green, red/orange, beans, peas, and lentils, starchy, and other), which are required in the NSLP meal patterns for grades K-12. These subgroups are not required in the ASP or the preschool meal patterns.

- NSLP and SBP for grades K-12: Product Formulation Statement for Documenting Vegetables and Fruits in School Meal Programs (USDA): https://fns-prod.azureedge.us/sites/default/files/resource-files/PFS\_Veg\_Subgroups\_ Fruits\_Fillable\_508.pdf
- NSLP and SBP for grades K-12: Product Formulation Statement for Documenting Vegetables and Fruits in School Meal Programs – Completed Sample for Vegetables (USDA): https://fns-prod.azureedge.us/sites/default/files/resource-files/PFSsamplevegetables.pdf
- NSLP and SBP for grades K-12: Product Formulation Statement for Documenting Vegetables and Fruits in School Meal Programs: Completed Sample for Fruits (USDA): https://fns-prod.azureedge.us/sites/default/files/resource-files/PFSsamplefruits.pdf
- NSLP, SBP, and ASP for preschoolers: Product Formulation Statement for Documenting Vegetables and Fruits in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/PFS\_Total\_Veg\_Fruits\_ Fillable 508.pdf



#### PFS forms for grains

The PFS forms for the NSLP and SBP meal patterns for grades K-12 and the preschool meal patterns are used to document the grains oz eq contribution in one serving of a commercial product. The PFS form for the ASP meal pattern for grades K-12 is used to document the grains/breads servings in one serving of a commercial product.

- NSLP and SBP for grades K-12 and NSLP, SBP, and ASP for preschoolers: Product Formulation Statement for Documenting Grains in Child Nutrition Programs (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/PFS\_Grains\_Oz\_Eq\_ Fillable\_508.pdf
- NSLP and SBP for grades K-12 and NSLP, SBP, and ASP for preschoolers: Product Formulation Statement for Documenting Grains in Child Nutrition Programs – Completed Sample (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/PFS\_Example\_Grains\_ Oz\_Eq.pdf
- ASP for grades K-12: 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): https://www.fns.usda.gov/sites/default/files/resource-files/PFS\_Grains-Breads\_ Servings Fillable 508.pdf
- ASP for grades K-12: Product Formulation Statement for Documenting Grains/Breads Servings in the Child and Adult Care Food Program, Summer Food Service Program, and NSLP Afterschool Snacks – Completed Sample (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/PFS\_Example\_Grains-Breads\_Servings.pdf

Effective July 1, 2025, the USDA final rule, *Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans*, aligns the ASP meal pattern for grades K-12 with the Child and Adult Care Food Program (CACFP) snack meal pattern requirements, except that the NSLP and SBP weekly juice limit and weekly whole grain-rich (WGR) requirement for grades K-12 apply. This means that the grains PFS for the NSLP and SBP meal patterns for grades K-12 (which is based on oz eq instead of servings) will also apply to the ASP meal pattern for grades K-12.

## Resources

- Afterschool Snack Program Meal Patterns (CSDE's Afterschool Snack Program webpage): https://portal.ct.gov/sde/nutrition/afterschool-snack-program#MealPatterns
- Appendix A to 7 CFR 210: Alternate Foods for Meals (USDA): https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#Appendix-Ato-Part-210
- Appendix A to 7 CFR 220: Alternate Foods for Meals (USDA): https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-220#Appendix-Ato-Part-220
- Crediting Foods in School Nutrition Programs (CSDE webpage): https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs
- FBG Module 3: Product Formulation Statements (Institute of Child Nutrition): https://theicn.docebosaas.com/learn/courses/139/fbg-module-3-product-formulationstatements-pfs
- Food Buying Guide for Child Nutrition Programs (USDA): https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs
- Food Manufacturers/Industry (USDA webpage): https://www.fns.usda.gov/cnlabeling/food-manufacturersindustry
- Guide to Meeting the Whole Grain-rich Requirement for the National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12 (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/wgr\_requirement\_snp\_grades\_ k-12.pdf
- Manufacturer's Product Formulation Statement: Is it Acceptable? (ICN and USDA): https://www.youtube.com/watch?v=xtUo70IP9cc
- Manufacturer's Product Formulation Statement: Is it Acceptable? Presentation Slides (ICN and USDA):

https://theicn.org/resources/930/march-2016/109876/manufacturers-product-formulation-statement-pfs03-31-16.pdf

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage): https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage): https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs/ documents

- Module 6: Meal Pattern Documentation (CSDE's training program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12): https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials
- Product Formulation Statements ("Related Resources" section of CSDE's Meal Patterns for Preschoolers in School Nutrition Programs webpage): https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutritionprograms/related-resources#PFS
- Product Formulation Statements (CSDE's Crediting Foods in School Nutrition Programs webpage):

https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs#PFS

- Records Retention Requirements for the School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/records\_retention\_snp.pdf
- Tips for Evaluating a Manufacturer's Product Formulation Statement (USDA): https://www.fns.usda.gov/sites/default/files/resource-files/manufacturerPFStipsheet.pdf
- USDA Final Rule: Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962): https://www.federalregister.gov/documents/2024/04/25/2024-08098/child-nutritionprograms-meal-patterns-consistent-with-the-2020-2025-dietary-guidelines-for
- USDA Memo SP 05-2025, CACFP 04-2025, and SFSP 02-2025: Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements: https://www.fns.usda.gov/cn/labeling/guidance-accepting-processed-product-documentation
- Using Child Nutrition (CN) Labels in the School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/cn\_labels\_snp.pdf
- When Commercial Grain Products Require a Product Formulation Statement to Credit in the School Nutrition Programs (CSDE): https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/when\_commercial\_grain\_ products\_require\_pfs\_snp.pdf

For more information, visit the CSDE's Meal Patterns for Grades K-12 in School Nutrition Programs webpage, Crediting Foods in School Nutrition Programs webpage, and Meal Patterns for Preschoolers in School Nutrition Programs webpage or contact the school nutrition programs 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/crediting/product\_formulation\_statements.pdf.

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- 2. fax: (833) 256-1665 or (202) 690-7442; or
- 3. email: program.intake@usda.gov

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