CRITERIA FOR WHOLE GRAIN-RICH FOODS FOR PRESCHOOL MEALS
in the National School Lunch Program and School Breakfast Program

This information applies only to preschoolers (ages 1-4) in the U.S. Department of Agriculture’s (USDA) School Breakfast Program (SBP) and National School Lunch Program (NSLP), including the Afterschool Snack Program (ASP) and Seamless Summer Option (SSO) of the NSLP. For information on the whole grain-rich (WGR) requirement for grades K-12 in the SBP, NSLP, and SSO, see the Connecticut State Department of Education’s (CSDE) handout, Criteria for Whole Grain-rich Foods for Grades K-12 in the NSLP and SBP. The ASP for grades K-12 does not have a WGR requirement. For additional guidance on the grains component for preschoolers, see the CSDE’s Menu Planning Guide for Preschool Meals.

All grain items used to meet the grains component of the preschool meal patterns must be whole grain or enriched. Cereal grains (e.g., oats, barley, cornmeal, and bulgur) and ready-to-eat (RTE) breakfast cereals and cooked breakfast cereal grains (e.g., oatmeal and cream of wheat) must be whole grain, enriched, or fortified. This information must be specified on the product’s label in the ingredients statement.

Unlike the meal patterns for grades K-12, products that contain only enriched grains credit in the preschool meal patterns, if the preschool menus meet the whole grain-rich (WGR) requirement. For more information, see USDA Memo CACFP 02-2017: Grain Requirements in the CACFP: Q&As and the CSDE’s handout, Crediting Enriched Grains in the NSLP and SBP.

WGR REQUIREMENT
Effective October 1, 2017, at least one grain serving per day must be WGR, between all preschool meals and Afterschool Snack Program (ASP) snacks served to preschoolers. The WGR definition for preschool meals is different from the WGR definition for grades K-12. Foods that qualify as WGR for preschool meals contain at least 50 percent whole grains and any other grain ingredients are enriched. WGR foods include 100 percent whole grains (every grain ingredient is whole grain).

Unlike the WGR definition for grades K-12, the WGR definition for preschool meals does not include a limit for noncreditable grains. Table 1 summarizes the WGR criteria for preschool meals.

<table>
<thead>
<tr>
<th>Table 1. WGR Criteria for Preschool Meals</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The product must contain at least 50 percent whole grains, as indicated by at least one of the following criteria: the product lists a whole grain first (or second after water) in the ingredients statement; or the product includes the Food and Drug Administration’s (FDA) whole grain health claim. For information on evaluating products for compliance with this criterion, see Step 1 on page 2.</td>
</tr>
<tr>
<td>2. Any remaining grain ingredients in the product must be enriched. For information on evaluating products for compliance with this criterion, see Step 2 on page 5.</td>
</tr>
</tbody>
</table>

To determine if grain-based foods are WGR, school food authorities (SFAs) must review the product’s package label and product formulation statement (PFS), using the two steps below.

1. Determine if whole grains are at least 50 percent of the product’s total weight.
2. Determine if all other grain ingredients in the product are enriched.

Detailed guidance on each step follows. For examples of how to evaluate a product for compliance with the three WGR criteria, see “Determining if Products Meet WGR Criteria” on page 4.
STEP 1 – DETERMINE IF WHOLE GRAINS ARE AT LEAST 50 PERCENT

A product contains at least 50 percent whole grains by weight if it meets at least one of the two USDA criteria below: a whole grain is the first ingredient, or the product includes the FDA’s whole grain health claim. These criteria are summarized below. For information on identifying whole grains, see the CSDE’s handout, Identifying Whole Grains in the NSLP and SBP.

1. **Whole Grain is First Ingredient:** The product’s ingredients statement lists a whole grain first, or lists a whole grain second after water. The ingredients statement below shows an example for a whole-wheat bagel. The first ingredient is whole-wheat flour.

   **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.

   The method for determining if a whole grain is the first ingredient is different for products that contain only the grains component (such as breads and cereals), and combination foods that contain grains with other food components such as meat/meat alternates and vegetables, e.g., pizza, burritos, and breaded chicken nuggets.

   **Grain-only Products:** For foods containing only the grains component, a whole grain must be listed first or listed second after water. The ingredients statement below shows an example for an English muffin. The first ingredient after water is whole-wheat flour.

   **Ingredients:** Water, whole-wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), yeast, wheat gluten, contains less than 2% of each of the following: soybean oil, sugar, salt, calcium propionate (preservative), fumaric acid, baking soda, monocalcium phosphate, calcium sulfate, ammonium sulfate.

   **Combination Foods:** For foods that contain grains with other food components such as meat/meat alternates and vegetables, a whole grain must be the first grain ingredient in the list of grains. The ingredients statement below shows an example for cheese ravioli. The first ingredient is fat-free ricotta cheese in the filling (nongrain ingredient), but the first grain ingredient in the pasta (grains component) is whole-wheat flour.

   **Ingredients:** FILLING: Fat-free ricotta cheese (whey, skim milk [made from nonfat dry milk powder], vinegar, xanthan gum, carrageenan), water, egg, low moisture part skim mozzarella cheese (cultured part skim milk, salt, enzymes), whey protein isolate, sodium caseinate, romano cheese made from cow’s milk (cultured milk, salt, enzymes), bleached wheat flour, garlic salt (salt, dehydrated garlic), salt, corn starch-modified, sugar, dehydrated garlic. PASTA: whole wheat flour, enriched durum wheat flour (wheat flour, niacin, ferrous sulfate, thiamin mononitrate, riboflavin, folic acid), water, egg.
For foods made on site, SFAs must use the standardized recipe to determine if the total weight of all whole-grain ingredients exceeds the total weight of enriched grain ingredients. For example, a pizza dough recipe containing 6 pounds of whole-wheat flour and 5 pounds of enriched flour contains more than 50 percent whole grains because the whole-wheat flour weighs more than the enriched flour. For more information on standardized recipes, see section 2 of the CSDE’s Menu Planning Guide for Preschool Meals.

2. Whole Grain Health Claim: The product packaging includes one of the FDA’s whole grain health claims, which are allowed for whole-grain foods. These claims are not commonly found on most grain products. The low-fat claim is “Diets rich in whole grain foods and other plant foods and low in total fat, saturated fats, and cholesterol, may help reduce the risk of heart disease and certain cancers.” The moderate-fat claim is “Diets rich in whole grain foods and other plant foods, and low in saturated fats and cholesterol, may help reduce the risk of heart disease.” The health claim on the package label must be identical to one of these statements. For consistency with the Dietary Guidelines for Americans, the USDA recommends choosing grain products with the FDA’s low-fat health claim.

Products with Multiple Grain Ingredients
If a product’s whole grain content comes from multiple grain ingredients, the amount of whole grains includes the combined weight of all whole-grain ingredients. The whole-grain ingredients could be the greatest ingredient by weight, even if a whole grain is not listed as the first ingredient. This product could meet the WGR criteria with proper documentation from the manufacturer. If the combined weight of all whole grains is more than the first ingredient, the product contains at least 50 percent whole grains.

For example, the PFS for a multigrain bread indicates that the product contains three grain ingredients: enriched flour (40 percent of grains); whole-wheat flour (30 percent of grains); and whole oats (30 percent of grains). For this product, whole grains are the primary ingredient by weight since the combined weight of the whole-wheat flour and whole oats (60 percent) is greater than the weight of the enriched flour (40 percent), even though enriched flour is listed first in the ingredients statement.

The ingredients statement below shows an example for oat bread. If the product’s PFS documents that the combined weight of the whole-wheat flour and whole oats is more than the weight of the enriched flour, the product meets the criteria for at least 50 percent whole grains.

Ingredients: Water, unbleached enriched wheat flour [flour, malted barley flour, reduced iron, niacin, thiamin mononitrate (vitamin B1), riboflavin (vitamin B2), folic acid], 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 with Flour Blends

When products contain a flour blend grouped together with parentheses, e.g., “flour blend (whole wheat flour, enriched flour),” SFAs must obtain a PFS from the manufacturer that documents the weight of each creditable grain ingredient. The PFS must indicate that the weight of the whole grain is more than the first ingredient listed after the flour blend. The ingredients statement below shows an example for a roll that lists a flour blend as the first ingredient after water.

Ingredients: Water, flour blend [whole-wheat flour, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, enzyme, folic acid)], water, brown sugar, corn oil, dough conditioner (soybean oil, vegetable glycerides, soy flakes), yeast, salt, wheat gluten, enzyme.

The ingredients statement indicates that the total weight of the flour blend (whole-wheat flour and enriched flour) is more than the weight of the brown sugar. However, the ingredients statement does not indicate the weight of each individual ingredient in the flour blend. For example, if the flour blend is 40 percent of the product’s total weight (25 percent whole-wheat flour and 15 percent enriched flour) and sugar is 30 percent, the whole-wheat flour is not the greatest ingredient by weight. To determine if this product meets the criteria for at least 50 percent whole grains, the PFS must document that the weight of the whole-wheat flour is more than the weight of the brown sugar.

STEP 2 – DETERMINE IF OTHER GRAINS ARE ENRICHED

Enriched grains are refined grains (such as wheat, rice, and corn) and grain products (such as cereal, pasta, and bread) that have vitamins and minerals added to replace some of the nutrients lost during processing. The five enrichment nutrients are defined by the Food and Drug Administration (FDA) and include thiamin (vitamin B1, thiamin mononitrate, thiamin hydrochloride), riboflavin (vitamin B2), niacin (vitamin B3, niacinamide), folic acid (folate), and iron (reduced iron, ferrous sulfate). To determine if a grain is enriched, check the label for the term “enriched” and check the ingredients statement for the five enrichment nutrients. If the ingredients statement includes all five nutrients, the product is enriched.

The ingredients statement below shows an example of a cracker that contains enriched flour in addition to whole-wheat flour. For more information, see the CSDE’s handout, Crediting Enriched Grains in the NSLP and SBP.

Ingredients: Whole wheat flour, unbleached enriched wheat flour (niacin, iron, thiamin mononitrate, tricalcium phosphate, riboflavin, folic acid), water, canola oil, all natural molasses, salt, cornstarch, baking soda.

DETERMINING IF PRODUCTS MEET WGR CRITERIA

Table 2 shows examples of how to evaluate products for compliance with the two WGR criteria for preschool meals. SFAs must obtain a PFS for any products that require additional documentation to determine compliance.

A product meets criterion 1 (whole grain) if a whole grain is the first ingredient, or water is the first ingredient and a whole grain is the second ingredient, or a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight. A product meets
criterion 2 (enriched) if all creditable grains other than whole grains are enriched or the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain. SFAs must obtain a PFS for any products that require additional documentation to determine compliance.

Table 2. Evaluating Sample Products for Compliance with the WGR Criteria

For each ingredients statement below, creditable grains (whole and enriched) are indicated in green and whole grains are capitalized.

<table>
<thead>
<tr>
<th>Ingredients Statement</th>
<th>WGR Criteria for Preschool Meals</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>English Muffin</strong></td>
<td></td>
</tr>
<tr>
<td>Ingredients: Water, WHOLE-WHEAT FLOUR, enriched flour (wheat flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid), yeast, wheat gluten, contains less than 2% of each of the following: soybean oil, sugar, salt, calcium propionate (preservative), fumaric acid, baking soda, monocalcium phosphate, calcium sulfate, ammonium sulfate.</td>
<td>✅ Criterion 1 (Whole Grain): A whole grain is the first ingredient OR water is the first ingredient and a whole grain is the second ingredient OR a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight. ✅ Criterion 2 (Enriched): All creditable grains other than whole grains are enriched OR the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain. Is Product WGR? ☑ Yes ☐ No ☐ PFS Needed</td>
</tr>
</tbody>
</table>

Whole-wheat flour is the first ingredient after water (criterion 1). The only other creditable grain ingredient is enriched flour (criterion 2).

| **Oat Bread**                                              |                                  |
| Ingredients: Unbleached enriched wheat flour (flour, malted barley flour, reduced iron, niacin, thiamin mononitrate (vitamin B1), riboflavin (vitamin B2), folic acid), 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. | ☐ Criterion 1 (Whole Grain): A whole grain is the first ingredient OR water is the first ingredient and a whole grain is the second ingredient OR a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight. ☐ Criterion 2 (Enriched): All creditable grains other than whole grains are enriched OR the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain. Is Product WGR? ☐ Yes ☑ No ☐ PFS Needed |

To determine if this product meets criterion 1, the SFA must obtain a PFS from the manufacturer. Enriched flour is the first ingredient (criterion 2) but this product also contains two whole grains (whole-wheat flour and whole oats). If the combined weight of the whole-wheat flour and whole oats is more than the weight of the enriched flour, this product contains at least 50 percent whole grains and meets criterion 1. For more information, see “Products with Multiple Grain Ingredients” on page 3.
### Table 2. Evaluating Sample Products for Compliance with the WGR Criteria, continued

<table>
<thead>
<tr>
<th>Ingredients Statement</th>
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</tr>
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<tbody>
<tr>
<td><strong>Tortilla Chips</strong></td>
<td></td>
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</tbody>
</table>
| Ingredients: Yellow corn (enriched with thiamine, riboflavin, niacin, iron, folic acid), vegetable oil (contains one or more of the following: canola oil, corn oil, sunflower oil), salt. | ☑ Criterion 1 (Whole Grain): A whole grain is the first ingredient OR water is the first ingredient and a whole grain is the second ingredient OR a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight.  
☑ Criterion 2 (Enriched): All creditable grains other than whole grains are enriched OR the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain.  
Is Product WGR? ☑ Yes ☐ No ☐ PFS Needed  
This product does not contain a whole grain as the first ingredient (criterion 1). Enriched yellow corn is the first and only creditable grain ingredient (criterion 2).  
Note: Products that are not WGR, but contain an enriched grain as the first ingredient, credit in the preschool meal patterns if the SFA offers at least one serving of WGR grains per day. |
| **Blueberry Muffin**  |                                 |
| Ingredients: WHOLE-WHEAT FLOUR, sugar, eggs, water, blueberries, enriched flour (flour, malted barley flour, niacin, reduced iron, thiam mononitrate, riboflavin, folic acid), invert sugar, soybean oil, contains 2% or less of: palm oil, canola oil, propylene glycol mono- and diesters of fats and fatty acids, oat fiber, leavening (baking soda, sodium aluminum phosphate, monocalcium phosphate), mono- and diglycerides, modified food starch, potassium sorbate (preservative), sodium alginate, salt, soy lecithin, natural and artificial flavor, sodium stearoyl lactylate, wheat starch, blackberry juice concentrate, blueberry juice concentrate, malic acid, enzymes. | ☑ Criterion 1 (Whole Grain): A whole grain is the first ingredient OR water is the first ingredient and a whole grain is the second ingredient OR a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight.  
☑ Criterion 2 (Enriched): All creditable grains other than whole grains are enriched OR the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain.  
Is Product WGR? ☑ Yes ☐ No ☐ PFS Needed  
Whole-wheat flour is the first ingredient (criterion 1). The only other creditable grain ingredient is enriched flour (criterion 2). |
Table 2. Evaluating Sample Products for Compliance with the WGR Criteria, continued

<table>
<thead>
<tr>
<th>Ingredients Statement</th>
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<tbody>
<tr>
<td><strong>Cheese Ravioli</strong></td>
<td>![Image](Cheese Ravioli.png)</td>
</tr>
</tbody>
</table>
| Ingredients: **FILLING**: Fat-free ricotta cheese (whey, skim milk [made from nonfat dry milk powder], vinegar, xanthan gum, carrageenan), water, egg, low moisture part skim mozzarella cheese (cultured part skim milk, salt, enzymes), whey protein isolate, sodium caseinate, romano cheese made from cow’s milk (cultured milk, salt, enzymes), bleached wheat flour, garlic salt (salt, dehydrated garlic), salt, corn starch-modified, sugar, dehydrated garlic. **PASTA**: WHOLE-WHEAT FLOUR, enriched durum wheat flour (wheat flour, niacin, ferrous sulfate, thiamin mononitrate, riboflavin, folic acid), water, egg. | ☑ Criterion 1 (Whole Grain): A whole grain is the first ingredient OR water is the first ingredient and a whole grain is the second ingredient OR a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight.  
☑ Criterion 2 (Enriched): All creditable grains other than whole grains are enriched OR the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain. |

<table>
<thead>
<tr>
<th><strong>Is Product WGR?</strong></th>
<th>☑ Yes ☐ No ☐ PFS Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is Product WGR?</td>
<td>Yes</td>
</tr>
<tr>
<td>This product is a combination food that contains a filling (nongrain ingredient) made from cheese (meat/meat alternates components), in addition to the pasta (grains component). The <strong>pasta ingredients</strong> are highlighted in yellow. Whole-wheat flour is the first ingredient of the pasta (criterion 1) and the only other creditable grain ingredient is enriched flour (criterion 2). Criterion 2 does not apply to the bleached wheat flour in the cheese filling because this ingredient is part of the filling (nongrain ingredient) and not the <strong>pasta</strong> (grain ingredient).</td>
<td></td>
</tr>
</tbody>
</table>
**Crediting of Nongrain Components**: To credit the ricotta and mozzarella cheese toward the preschool meal patterns, the manufacturer’s PFS must document the amount of cheese per serving. |

| **Chicken Vegetable Egg Roll** | ![Image](Chicken Vegetable Egg Roll.png) |
| Ingredients: **FILLING**: Cabbage, ground chicken, carrots, textured soy protein (textured soy flour, zinc oxide, niacinamide, ferrous sulfate, copper gluconate, vitamin a palmitate, calcium pantothenate, thiamine mononitrate [B1], pyridoxine hydrochloride [B6], riboflavin [B2], cyanocobalamin [B12]), celery, water, onion, contains 2% or less of: dried whole egg, whey protein concentrate, flavor (autolyzed yeast extract, salt, dextrose, natural flavor), sugar, soy sauce powder (soy sauce [wheat, soybeans, salt], maltodextrin, salt), modified food starch, dehydrated onions, sea salt, garlic, spice; **WRAPPER**: WHITE WHOLE-WHEAT FLOUR, water, enriched flour (wheat flour [niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid]), enriched durum flour (wheat flour, niacin, ferrous sulfate, thiamine mononitrate, riboflavin, folic acid), contains 2% or less of: wheat gluten, vegetable oil (soybean, cottonseed, corn, and/or canola oil), flavor (autolyzed yeast extract, salt, dextrose, natural flavor), dried whole egg, salt, rice extract, ascorbic acid, cornstarch; water. Fried in vegetable oil (soybean, cottonseed, corn, and/or canola oil). | ☑ Criterion 1 (Whole Grain): A whole grain is the first ingredient OR water is the first ingredient and a whole grain is the second ingredient OR a whole grain is not the first ingredient but the combined weight of all whole grains is the greatest ingredient by weight.  
☑ Criterion 2 (Enriched): All creditable grains other than whole grains are enriched OR the ingredients statement only lists whole grains, i.e., the product is 100 percent whole grain. |

<table>
<thead>
<tr>
<th><strong>Is Product WGR?</strong></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Is Product WGR?</td>
<td>Yes</td>
</tr>
<tr>
<td>This product is a combination food that contains a filling (nongrain ingredient) made from vegetables and chicken (vegetables and meat/meat alternates components), in addition to the egg roll wrapper (grains component). The wrapper meets the three WGR criteria. The wrapper ingredients are highlighted in yellow: White whole-wheat flour is the first ingredient (criterion 1). The only other creditable grain ingredient is enriched flour (criterion 2).</td>
<td></td>
</tr>
</tbody>
</table>
**Crediting of Nongrain Components**: To credit the ricotta and mozzarella cheese toward the preschool meal patterns, the manufacturer’s PFS must document the amount of cheese per serving.
RESOURCES

Afterschool Snack Program Handbook:

Calculation Methods for Crediting Grains for Preschool Meals in the NSLP and SBP:

Crediting Enriched Grains in the NSLP and SBP:

Grain Serving Sizes for Preschool Meals in the NSLP and SBP (October 1, 2017 through September 30, 2019):

Identifying Whole Grains in the NSLP and SBP:

Product Formulation Statements:

USDA PFS for Documenting Grains in School Meals:

Tips for Evaluating a Manufacturer’s Product Formulation Statement: https://fns-prod.azureedge.net/sites/default/files/cn/manufacturerPFSstipsheet.pdf

USDA Memo CACFP 02-2017: Grain Requirements in the CACFP: Q&As.

Whole Grain-rich Ounce Equivalents (Oz Eq) for Preschool Meals: (Effective October 1, 2019):

For more information, see the Connecticut State Department of Education’s (CSDE) Menu Planning Guide for Preschool Meals and Meal Patterns for School Nutrition Programs and Crediting Foods in School Nutrition Programs webpages or contact the school nutrition programs staff in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103.

This handout is available at www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/nslp/crediting/wgrcriteriaforpreschool.pdf.

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mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

fax: (202) 690-7442; or

email: program.intake@usda.gov.

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