

# EXHIBIT K

**DECLARATION OF** [REDACTED]

I, [REDACTED] declare as follows:

1. I am the owner of [REDACTED], a day care based in [REDACTED]. I make this declaration as a representative of [REDACTED] based on my personal knowledge and my review of [REDACTED]'s business records.
2. I founded [REDACTED] in 2007. [REDACTED]. We provide childcare services funded in part via the Child Care and Development Block Grant ("CCDBG") through the Department of Health and Human Services' Office of Child Care, and the Department of Agriculture's Child and Adult Food Program ("USDA CACFP").
3. [REDACTED] is licensed to provide families childcare for children from six weeks to 12 years. The business relies heavily on federal funding programs. Without that funding support, the business would not be able to operate.
4. For instance, [REDACTED] began participating in YoungStar in 2010. YoungStar is Wisconsin's Quality Rating and Improvement System. YoungStar is funded through the federal CCDBG. YoungStar provides support to both parents and childcare providers in Wisconsin. [REDACTED] has a five-star rating, so we receive "bonus" funding from YoungStar. [REDACTED] has received YoungStar bonus payments from time to time, whenever we have enrolled a family who qualifies for subsidy. The most recent period during which [REDACTED] has received YoungStar bonus funding has been from June 2024 to present; during calendar year 2024, [REDACTED] received a total of \$[REDACTED] from the YoungStar five-star quality adjustment. Separately, because of our five-star rating, [REDACTED] received an additional \$[REDACTED] in calendar year 2024 from Wisconsin's Child Care Counts program. These are in addition to the base amount that every regulated child care program is eligible for. Wisconsin Shares adjustment on Program A (operational costs), and quality incentive amount for program B (wages), which is subsidized by federal funding from the American Rescue Plan Act. This year, I will receive that adjustment of \$[REDACTED] per month from Child Care Counts until the program ends in July.
5. [REDACTED] first applied for and was approved to participate in the USDA Child and Adult Care Food Program ("CACFP") in 2010. CACFP is a federal program that promotes children's healthy growth and development by ensuring access to balanced meals and snacks throughout the day. The program provides reimbursements for meals

and snacks that we serve to children whom we care for. Parents also must fill out paperwork when they begin and when they renew each year in April. In addition, a program representative comes in three times per year unannounced to check in on the food and the paperwork to ensure that we are in compliance.

6. Upon completion of eligibility requirements, the USDA CACFP will determine how much we are approved for and sets up a direct deposit for approved reimbursements to [REDACTED]. To be reimbursed, [REDACTED] documents what we feed the children, who is fed, the total costs, and we must submit every month's data by the fifth day of the following month, in order to be reimbursed for the food we provide to the children we care for.
7. After the month's paperwork is turned in, the reimbursement payment for food costs comes in about one month later. For example, we just received December 2024's food payment on Monday, January 27, 2025. During calendar year 2024, [REDACTED] received \$[REDACTED] through the USDA CACFP program.
8. On Monday, January 27, 2025, I became aware of a memorandum issued by the Office of Management and Budget ("OMB Memo") ordering that federal agencies suspend funding to grantees.
9. Prior to that Monday, I had concerns about the future of the CCDBG, based on some of the Trump campaign's language, but I had not expected this to come so soon.
10. I did not receive any communications from administrators of any of the federally funded programs in which I participate regarding the OMB Memo prior to Monday, January 27, 2025.
11. Because of my concerns, and in the face of no communications following the OMB Memo's issuance, I reached out myself. I called an official at the Wisconsin Department of Children and Families to ask if my business would be affected by the federal funding freeze. She said that it would affect my business, unless access to the payment portal was restored.
12. I also emailed the USDA CACFP for information on the funding freeze. The person to whom I spoke at USDA reported to me that she didn't know, but that I should reach out to [REDACTED], the Deputy State Superintendent at the Wisconsin Department of Public Instruction.

13. I emailed [REDACTED] at the Wisconsin Department of Public Instruction, who also said that he did not know what would happen in the face of the funding freeze.
14. The funding freeze's effect on business goes even further, though. [REDACTED] participation in the YoungStar program, [REDACTED] is eligible to participate in the Wisconsin Shares Child Care Subsidy Program ("Wisconsin Shares"), which is primarily funded through the federal CCDBG.
15. In 2009, [REDACTED] began accepting children whose tuition is subsidized by Wisconsin Shares. Since 2009, we have had many children funded through this program. Wisconsin Shares covers a portion of low-income families' childcare costs to help them access quality childcare.
16. Each month, Wisconsin Shares allocates its federally subsidized payments to parents. Parents then pay the funds to me to continue their childcare. Typically, parents receive their federally subsidized Wisconsin Shares funds on the last business day of each month on their EBT cards, and they authorize payment to [REDACTED] (per their contracts with [REDACTED]). Those payments typically arrive in my bank account on the following business day.
17. I received an e-mail from the Wisconsin Department of Children and Families on Thursday, January 30, 2025, at 1:48 PM with the subject line "January 30 Child Care Provider Updates - Federal Funding Questions | 2025 Year of the Kid | CCC Due Feb. 2" ("DCF Email").
18. The DCF Email addressed the funding freeze briefly, stating that "DCF has received a number of questions about the rapidly evolving situation regarding federal funds. At this point, we anticipate Wisconsin Shares payments and YoungStar Quality Adjustments going out as scheduled on January 31."
19. Accordingly, on Friday, January 31, 2025, I reminded one of my parents at morning drop-off to check her EBT balance to see whether the Wisconsin Shares subsidy had arrived in her account. Afterward, at 8:24 a.m. Central Time on Friday, January 31, 2025, she sent me a screenshot showing that the subsidy funds had not arrived in her account. That is atypical. I cannot remember a parent ever not receiving their federally subsidized Wisconsin Shares funds by the last business day of the month. I asked her to check again at around noon on Friday, January 31, 2025, and she still had not received the subsidy funds.



20. Without access to the federal funding programs in which [REDACTED] participates, my business will begin sliding toward imminent and certain closure. This is not speculative. It is a mathematical fact.
21. Without the federal funding available, my daycare would not be able to continue caring for the two children whose tuition payments are subsidized by Wisconsin Shares.
22. Without the income from the two children whose families' tuition payments are subsidized, [REDACTED] would not be able to meet its monthly operating costs. The result would be that I will need to begin looking for other employment, and my business will close in two months, at most. My business would not be able to immediately make up the lost income. To do so, I would need to enroll more children to replace those who are terminated for lack of payment, which takes time and is uncertain. The only alternative would be to raise rates for the rest of the parents, but my contracts with our parents require one month's notice of a rate increase. That makes an immediate rate increase impossible.
23. Furthermore, [REDACTED] raised rates by \$ [REDACTED] per month in mid-2024, and parents already have told me that if rates increase again, they will have to withdraw their children. Losing USDA funding would have the same result.
24. To be clear, losing any of these federal funding streams would bring imminent closure of my business. Losing both of them would bring that result sooner, but losing even one would be fatal.
25. The federal government's funding freeze creates an imminent risk to my business' ability to stay afloat. If my access to federal funding streams is not restored, I would not be able to schedule [REDACTED] part-time employee any later than February 28, 2025 (if [REDACTED] has not already closed by then).
26. [REDACTED] has been a member of the Main Street Alliance (MSA) since 2020, when they expanded into Wisconsin.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on January 31, 2025.

/s/ [REDACTED]

[REDACTED]  
Sole Proprietor, [REDACTED]