

FILED  
Court Administrator

JUN 22 2011

STATE OF MINNESOTA

RAMSEY COUNTY

By  Deputy

DISTRICT COURT

SECOND JUDICIAL DISTRICT

**In Re Temporary Funding of Core  
Functions of the Executive Branch of the  
State of Minnesota.**

Case Type: Civil

File No. 62-cv-11-5203  
The Honorable Bruce W. Christopherson

**AFFIDAVIT OF MINNESOTA CHILD  
CARE ASSOCIATION IN SUPPORT  
OF MEMORANDUM OF LAW BY  
THE *AMICI* COALITION OF CHILD  
CARE PROVIDERS AND  
SUPPORTERS**

State of Minnesota    )  
  ) ss.  
County of Hennepin    )

I, Chad Dunkley, being first duly sworn, depose under oath and state as follows:

1. I am the President of the Minnesota Child Care Association (“MCCA”), whose mission is to ensure that all families have access to high quality early learning opportunities, and that vital-role child care providers have future prosperity in the State of Minnesota.

2. I make this Affidavit on behalf of the MCCA in support of the Memorandum of Law submitted by the *Amici* Coalition of Child Care Providers and Supporters.

3. The MCCA is a state-wide association of over 200 privately owned and operated licensed child care centers in Minnesota. MCCA centers serve over 27,000 children every day, and approximately 20 percent of those children currently receive assistance through the Minnesota Child Care Assistance Program (“CCAP”).

4. Child care is a critical service for many at-risk families. It provides family stabilization, and allows parents to work and young children to thrive.

5. As a group of small business owners, MCCA members have grave concerns regarding the potential exclusion of the child care assistance programs from the defined areas of essential services during a government shutdown in Minnesota.

6. The child care industry operates on very small margins and cannot absorb a significant loss of revenue.

7. Providers who rely on child care assistance as a primary source of income will be forced to

- a. Stop serving low-income families—and their young children—who receive child care assistance to pay for services;
- b. Lay off employees due to the loss of revenue and enrollment, which is the largest controllable cost in a child care center; and/or
- c. Close programs, most likely on a permanent basis, as the revenue loss cannot be absorbed during a shutdown period.

8. Currently, families supported by MCCA members are reporting that they will not bring their children to child care centers without a guarantee that payment will be made from the state. If they are to lose child care assistance, these families have stated that they will be forced to make choices not in their best interest.

9. MCCA is also deeply concerned that the most vulnerable child care centers are also the same centers that serve Minnesota's most vulnerable families. The loss of access to these centers will put the State in jeopardy of meeting the federal requirements of equal access

for all families.

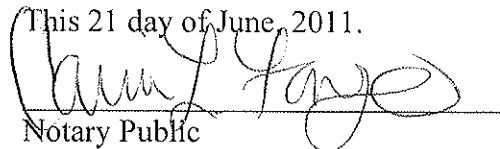
10. The omission of child care assistance from the identified list of essential services during the government shutdown will result in the loss of jobs (impacting both employees of child care centers and parents who are unable to continue working without affordable child care arrangements); the loss of small businesses in the State; and the missed opportunities for vulnerable children during a critical time of development.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: June 21, 2011.

  
By: Chad Dunkley

Subscribed and sworn to before me  
This 21 day of June, 2011.

  
Notary Public



fb.us.6955942.01