

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COMMONWEALTH OF
MASSACHUSETTS,
et al,

Plaintiffs,

v.

U.S. DEPARTMENT OF AGRICULTURE,
et al,

Defendants.

Case No. 26-cv-11396-MJJ

DECLARATION OF SHIELA CORLEY

I, Shiela Corley, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and accurate to the best of my information and belief:

1. I am the Chief of Staff for the Administrator of the United States Department of Agriculture's (USDA) Food and Nutrition Administration¹ (FNA). I have worked in this position since February 2025 and have worked at USDA in various capacities since 1995. In my capacity as Chief of Staff, I provide guidance and support to USDA senior leadership on matters pertaining to the administration of sixteen domestic nutrition and food security programs and promotion of dietary guidelines.
2. FNA is an agency within the USDA that administers nutrition assistance programs which ensure children, income eligible individuals, and families have access to healthy, safe, and affordable foods that promote optimal health and well-being, while building a more resilient food system.

¹ Effective June 1, 2026, the Food and Nutrition Service became the Food and Nutrition Administration.

3. Many of the nutrition assistance programs are administered at the State and local levels by State agencies through Federal/State Agreements (FSA). The funds issued for the following programs are administered through FSAs:
 - a. Nutrition Assistance Program (NAP) for American Samoa; NAP for Commonwealth of Northern Mariana Islands, and NAP for Puerto Rico;
 - b. Supplemental Nutrition Assistance Program (SNAP);
 - c. State Administrative Matching Grants for SNAP;
 - d. School Breakfast Program (SBP);
 - e. National School Lunch Program (NSLP);
 - f. Special Milk Program for Children (SMP);
 - g. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC);
 - h. Child and Adult Care Food Program (CACFP);
 - i. Summer Food Service Program for Children (SFSP);
 - j. State Administrative Expenses for Child Nutrition;
 - k. Commodity Supplemental Food Program (CSFP);
 - l. Food Distribution Program on Indian Reservations (FDPIR);
 - m. The Emergency Food Assistance Program (TEFAP);
 - n. WIC Farmers' Market Nutrition Program (FMNP);
 - o. Senior Farmers' Market Nutrition Program (SFMNP); and
 - p. Fresh Fruit and Vegetable Program (FFVP).
4. Summer EBT Program (S-EBT) is administered through terms and conditions similar to an FSA and is treated as an FSA program for the purposes of grant administration.

5. Secretarial Memorandum 1078-021 (SM), dated December 31, 2025, required USDA agencies and staff offices to adopt and implement the USDA General Terms and Conditions (GT&Cs) issued by the Office of the Chief Financial Officer (OCFO) for all future awards and significant modifications, unless authorized by a deviation granted by OCFO to implement an alternative policy, procedure, term, or condition.
6. Due to their unique nature, the FSA programs have historically operated through a unique set of terms and conditions. To date, FNA has not applied the GT&Cs to the FSAs, is not applying the GT&Cs to the FSAs, nor is FNA planning to apply the GT&Cs the FSAs.
7. To ensure compliance with the SM, on June 5, 2026, FNA requested and received a deviation from OCFO to authorize alternative terms and conditions in lieu of the GT&Cs for the FNA FSAs.
8. On May 14, 2026, OCFO approved a deviation for the fiscal year 2026 S-EBT program authorizing the use of alternative terms and conditions in lieu of the GT&Cs for Federal Awards. The deviation was based on the anticipated inclusion of the program within the FSAs in future fiscal years.

**SHIELA
CORLEY**

Shiela Corley
Chief of Staff
Food and Nutrition Administration
United States Department of Agriculture

Digitally signed by SHIELA
CORLEY

Date: 2026.06.05 14:40:25

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