Commonwealth of Massachusetts
Department of Early Education and Care

Board Meeting

December 13, 2022

Agenda

Routine Business

- Approval of Minutes from November 8, 2022 Meeting – VOTE
- Board Working Group: Workforce Recruitment & Retention – UPDATE

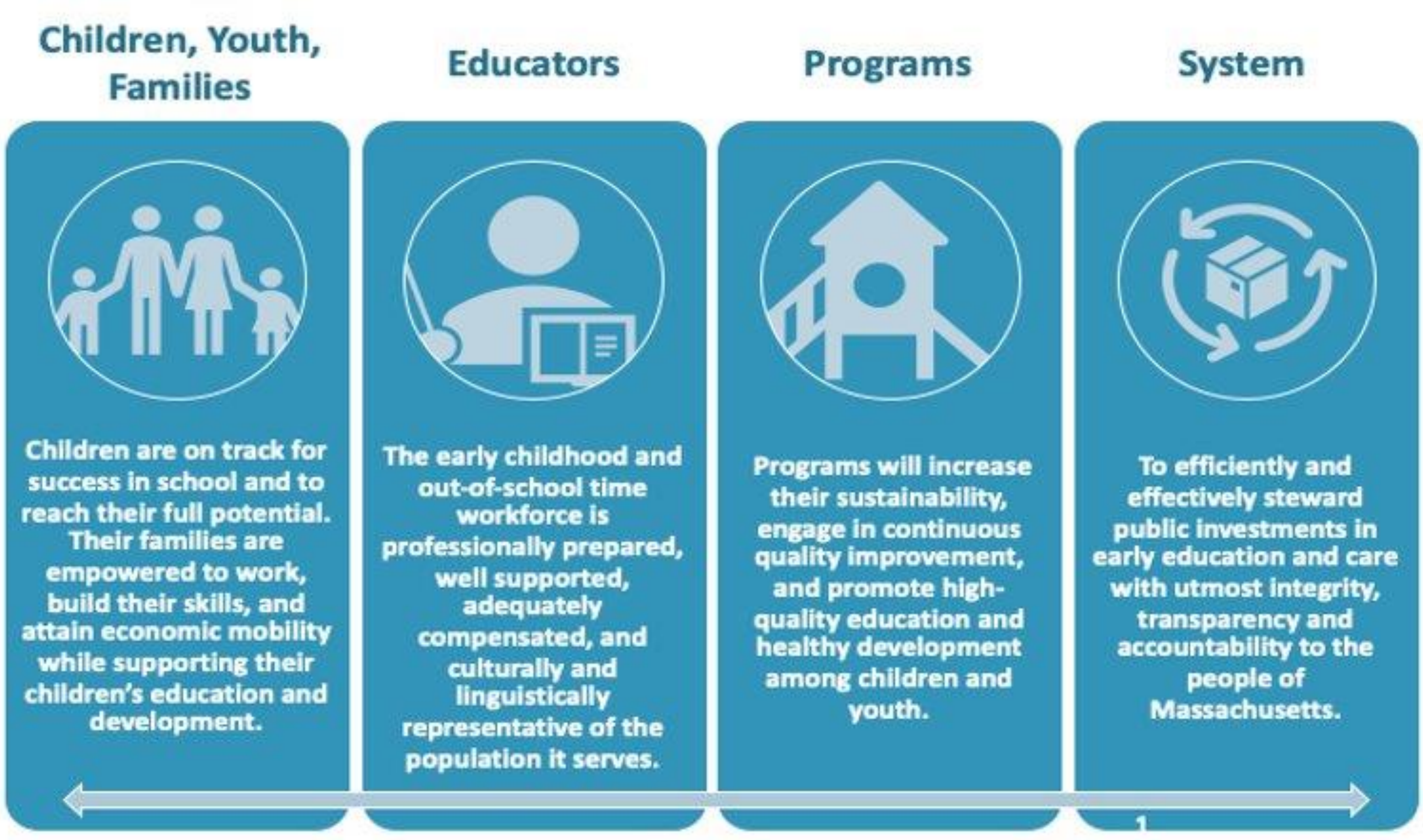
Items for Discussion and Action

- 2022 End of Year Review
- Child Care Financial Assistance (Subsidy)
  - Proposed Regulation Revisions - VOTE
- Commonwealth Cares for Children (C3) Program Update & Preliminary Survey Findings

Board Working Group:
Workforce Recruitment & Retention

End of Year Review

Operationalizing EEC's Strategic Action Plan



Operationalizing the EEC Strategic Action Plan Implementation Framework & Operational Focus

Human/user-centered restructuring of agency operations and business processes to modernize and improve the staff and user experience

Key User Groups

Children, Youth and Families	Programs	Educators
Maximize access, streamline procedures and expand early education and care options	Provide consistent, ongoing supports that promote stable financing, quality services and health and safety	Facilitate meaningful career pathways, professional advancement and retention of educators in the field

Enabling Mechanisms

- Data-driven decision making
- New and expanded technology
- Staff expertise and engagement
- On-going stakeholder engagement
- Targeted Program Integrity

Operationalizing the EEC Strategic Action Plan
Immediate Priority Projects

Leveraging cross-secretariat resources to accelerate enhancements and improvements that will improve user experiences and increase access for families.

Children and Families

Programs

Educators

Financial Assistance for Child Care (Subsidy)

- ✓ End to end review of existing subsidy, regulations, policy and processes to identify and reduce barriers for families and administrative burden for programs
- ✓ Waitlist analysis/clean-up
- ✓ Enroll additional children across all programs (IE, DCF, DTA)

Background Record Check (BRC)

- ✓ End to end review of existing process to identify business process and technology enhancements to reduce time from candidate selection to start date
- ✓ Federal Compliance (out of state checks, NSOR)

Building the Workforce System
Transitioning from Current to Future State

EEC is working on two parallel, but equally important efforts to address system needs.

Work to build robust professional opportunities and career pathways for educators

Immediate steps to address workforce capacity challenges

- Provide access to child care financial assistance to early education and care staff
- Develop public awareness/outreach campaign to build the pipeline
- Build new capacity through target supports for new new family child care businesses
- Promote recruitment and retention of new early educators through apprenticeship opportunities

2022 Progress – End of Year Review

Investing in Agency Capacity

- New organizational structure to operationalize strategic action plan and align the agency's operations with key users: families, educators, providers and EEC staff
- 3 new divisions:
- **Family Access & Engagement** as a dedicated team in the agency
    - **Research & Policy** to reflect the agency's commitment to increasing its use of data for decision-making
    - **Operations** to consolidate and better align existing functions across finance and budget, internal operations, HR and IT teams
- Recruitment and hiring in key programmatic areas: applied behavioral analysis regulatory structure, workforce development, family child care program support, child care facilities and business operations, external (partner) engagement
- "Digital future" road map to update, enhance, integrate and build new IT capacity (family, provider and staff facing)

Modernizing Background Records Checks

- Large-scale modernization of EEC's Background Record Checks system to implement two new processes and bring Family Child Care providers into the state's Navigator system
- One of the country's first out-of-state background records check process
- Enhanced background record checks process to include two additional checks maintaining compliance with federal requirements
- In partnership with residential programs, planning for retirement of Legacy system, allowing the Department to process checks for all applicants over 10x faster (average of 1.5 days versus 60 days for applicants with no findings).

2022 Progress – End of Year Review

Reimagining Child Care Financial Assistance

- Initiated procurement activities for resource and referral services and Income-Eligible, Supportive, Homeless and Young Parent program contracts
- Amended financial assistance regulations to ensure continuity of care during appeals process for families
- Completed full review of current regulations, policies, procedures and processes resulting in a significant package of child care financial assistance regulation changes aimed at simplifying and streamlining processes for families and program administration
- Launched pilot program aimed at enhanced outreach to families, streamlined intake an application processes and clean-up/updating of waitlist for child care financial assistance
- Implemented an historic $80M increase to the daily reimbursement rates to providers who serve EEC subsidized families

Supporting ECE Providers and Educators

- Continued monthly distribution of C3 funding to more than 7,150 programs across the Commonwealth
- Distributed $14M as a workforce bonus for programs participating in C3
- Established EEC Board Workforce Working Group with focus on recruitment and retention
- Secured funding to launch new Community College system-building partnership
- Added 7 CPPI communities to a total of 16 working to expand local preschool access
- Expansion of professional learning opportunities through Professional Development Centers, the StrongStart Learning Management System and the Early Childhood Mental Health Grantees
- Provided 30 additional programs access to the ECSO leadership coaching for a total of 83

Child Care Financial Assistance (Subsidy) Proposed Regulation Revisions

Timeline to Regulation Revision Proposal, April 2022 to Present

Information Gathering. Stakeholder Interviews & Reviewing Existing Materials

April: Reviewed previous engagements, family surveys, EEC strategic plan, and legislative reports

May: Interviewed EEC staff, CCRR's, Mass211 about pain points

June: Reviewed current regulations, policies, forms, and procedures

July: Engaged KPMG to provide support for resource and referral and contracted provider procurements

August: Launched Pilot with intake application and waitlist reconciliation

September: Assess feedback from first month of pilot, iterate and improve processes

October: Stakeholder Visioning Sessions with internal EEC staff, families, CCRR's, community groups

November: Preview regulation changes under consideration with Board

December 13, 2022: Draft Regulation Changes to Board for vote to send to public comment

We are **here.**

Guiding Principles for Improving Financial Assistance for Child Care

Family-Centered: Reorient the financial assistance for child care system to prioritize the experience and needs of Massachusetts families

Accessible & Equitable: Promote expanded and equitable access to child care promoting inclusive practices and communication

Simplified: Reduce the bureaucratic burden on families and subsidy administrators through increased flexibility and simplification of processes

Innovative: Introduce evidence-based, proven solutions and technology to improve overall system efficiency

Align Eligibility Requirements and Processes: Align across agency, state, and federal systems to create consistent processes

Collaborative: Work in tandem with internal and external partners to make improvements

Key Metrics for Child Care Financial Assistance Reforms

Increase…

- The number of children in families receiving child care financial assistance, including:
  – Low-income families (income-eligible)
  – Infants and toddlers
  – Families receiving SNAP and/or TAFDC through DTA
  – Supportive Child Care through DCF
  – Families facing housing insecurity/homelessness
- The number of providers participating in the child care financial assistance system

Decrease…

- The number of families on the Income Eligible Waitlist
- The timeline between a family's application for assistance to placement in a program.
- The timeline for appeals decisions

Three Areas of Reform
Child Care Financial Assistance Regulations

Currently **41** regulatory changes under consideration, categorized into **three core areas of reform:**

1 Increase overall system efficiency

13 proposed regulatory changes

2 Prioritize family needs and experience

17 proposed regulatory changes

3 Modernize and update system

11 proposed regulatory changes

1

Increase overall system efficiency

Approach:

- **Streamline and clarify roles/responsibilities** (i.e., revisit subsidy administrators' responsibilities to shift the burden away from the parent, consider affirmative outreach at different stages of child care financial assistance engagement)
- **Reduce documentation burdens** (paystubs, reduce duplication at reauthorization issues, broaden documentation options/streamline requirements, eligibility alignment with participation in other public assistance programs)
- **Use more inclusive and accessible language** to ensure policies and regulations are streamlined and written in simplified, clear, strength-based language

2

Prioritize family needs and experience

Approach:

- **More supports for families** (i.e., at the beginning of the application process with pre-application consultation, and updated one-pagers)
- **Alleviate burdens on families** (streamline and reduce duplication in the verification process)
- **Extend timelines** to ensure the stability of care for children and families are supported completely (i.e., post-transitional)
- **Reduce rigidity/increase flexibility** for families, without compromising the integrity or strength of our CCDF obligation

3

Modernize and update system

Approach:

- **Improve alignment** across EEC regulatory frameworks and partner agency policies and procedures
- **Strengthen partnerships** with financial assistance for child care-involved agencies to ensure processes are efficient and families are supported through seamless coordination and communication
- Evaluate and either extend or remove **COVID flexibilities**

Next Steps: Child Care Financial Assistance Regulation Reform

From Approval, Promulgation to Implementation

We are **here.**

Present Final Draft Regulation Changes to Board for vote to send to public comment

December 13, 2022

Regulation packet sent to Secretary of State; public comment period commences*

December 14

**EEC has discretion over timeline of public comment period*

Board reviews public comment; potentially votes time on Regulations for promulgation

March 14, 2023

Finalize revised policies and procedures based off newly approved regulations

March/April 2023

Deployment of new policies and procedures to field (trainings, new materials)

May/June 2023

Effective Date of Regulations and Policies

July 1, 2023

December 13, 2022

Child Care Financial Assistance (Subsidy) Proposed Regulations Revisions - VOTE

Approval of Proposed Amendments to Financial Assistance for Subsidized Care Regulations (606 CMR § 10) and Authorization to Solicit Public Comment on the Proposed Regulatory Changes

EEC seeks authority to revise its Financial Assistance for Subsidized Care regulations to increase overall system efficiency; prioritize family needs and experience; and modernize and update the overall child care financial assistance system. In addition to changes that make the regulations more user-friendly and readable, the substantive changes:

- Reduce and eliminate unnecessary and duplicative documentation and reporting requirements that create an undue burden for families.
- Update employment definitions and requirements to reflect the changing nature of work, including more flexibility for hourly wage earners and those working from home.
- Add qualifying service needs for individuals experiencing domestic violence, waive fees for homeless families, and ease and update reporting requirements for individuals with disabilities or participating in treatment for substance abuse.
- Amend the definitions of possible sanctions to clarify the intentional nature of program violations and eliminate the imposition of penalties and loss of assistance where there is no clear intent to defraud.
- Align requirements with associated agencies to streamline processes and reduce administrative burdens.

Vote: that the Board of Early Education and Care approves the Department's proposed amendments to 606 CMR § 10 and authorizes the Commissioner of Early Education and Care to solicit public comment on the proposed amendments, subject to Board approval of the final regulations.

Commonwealth Cares for Children (C3) Program Update & Preliminary Fall Survey Findings

Presentation Roadmap

- Context: Child Care Market and Program Financing
- C3 Fall 2022 Survey Overview and Preliminary Survey Findings
  - Overall Impact of C3
  - C3 Spending
  - Capacity, Staffing and Compensation
  - Family Access and Enrollment
- C3 Funding Allocation and FY23 & FY24 Planning

Program Financing and C3

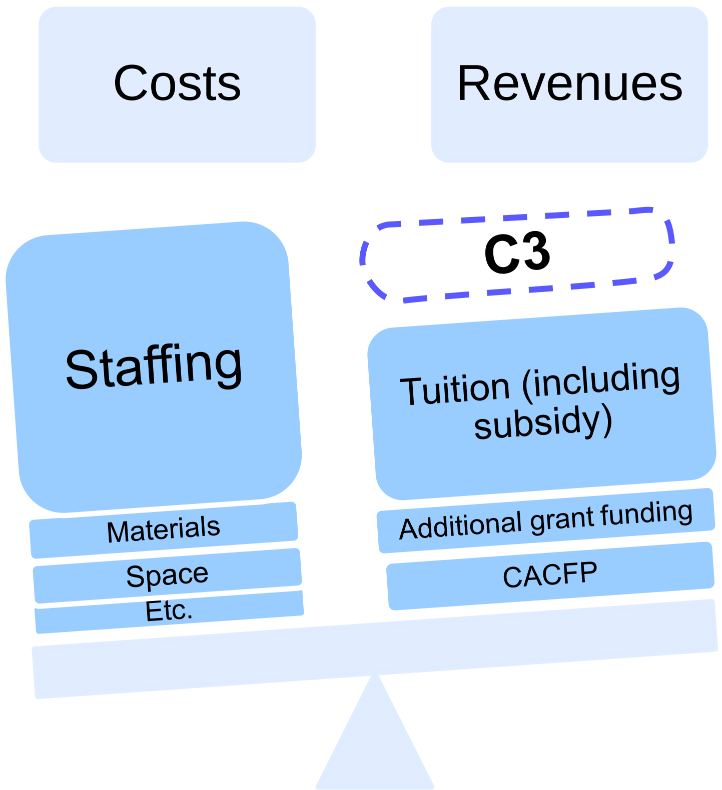
Programs

Programs will increase their sustainability, engage in continuous quality improvement, and promote high-quality education and healthy development among children and youth.

Key Takeaways:

- Market rate and preliminary cost analysis highlight the persistent gap for most programs between revenue and cost.
- C3 is playing a critical role in addressing this gap by providing operational supports and funds to invest in compensation and benefit increases for educators.
- C3 has helped to stabilize (maintain) capacity and avoid tuition increases, but staffing shortages continue to limit expanded capacity.
- C3 formula has been effective in targeting resources to both staffing and to programs serving EEC subsidized families and operating in communities with high SVI.
- C3 has strengthened the relationship between EEC and participating early education and care programs (88% participation rate), providing new insight and data about the system.
- Data on the system and program efficacy can help inform future development/focus for C3.

Context: Child Care Market and C3

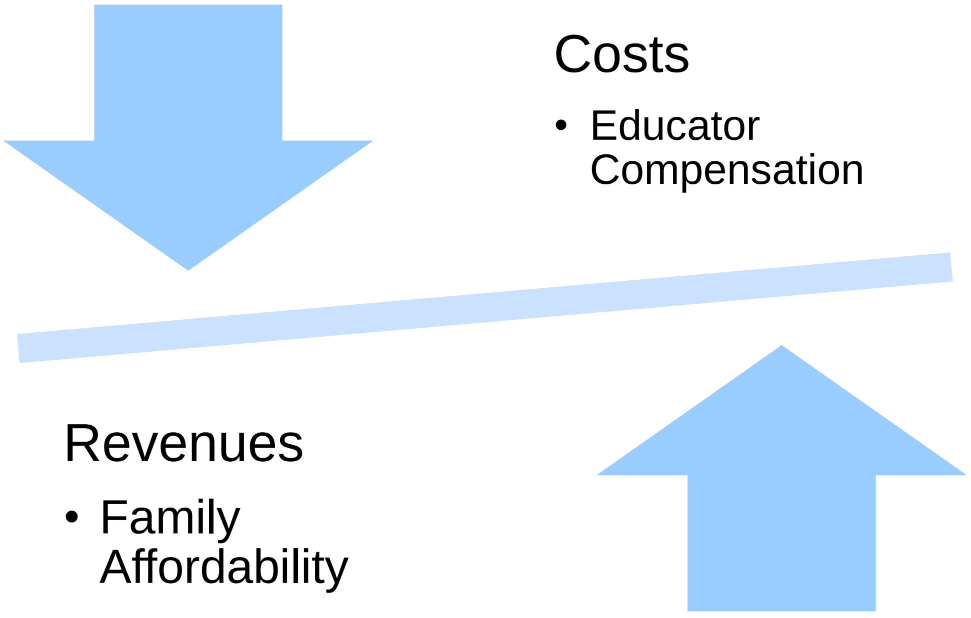


In a functioning market, revenues are expected to be greater than costs, allowing for reasonable reserves and opportunities for reinvestments.

Child care revenue comes largely from tuition, whether in the form of parent fees of subsidies from EEC, which, if increased too much, can threaten affordability and access for families.

C3 grants were designed to replace lost revenue due to pandemic-related enrollment fluctuations. Data from grantees points to ongoing challenges in balancing costs associated with workforce retention with affordability for families.

Primary Pain Points in Child Care Market



Current market pressures require increases to educator compensation to retain and hire qualified staff and quality improvements while restricting tuition increases to ensure family affordability.

These pressures are driving an already unstable business model further out of balance.

C3 Fall 2022 Survey Overview

In September, EEC launched the third in a series of surveys to gather additional information about programs' use of C3 grant funds, ongoing financial needs, investments in educators, and services provided to families.

The fall survey launched on September 28 and providers were required to complete the survey when they applied for their next monthly C3 grant.

This analysis includes responses from 6,010 providers (78%) that completed the survey prior to November 10, 2022. Respondents include:

- 2,103 GSA programs (73%)
- 3,907 FCC programs (81%)
- 3,757 programs (87%) that serve children with subsidies*

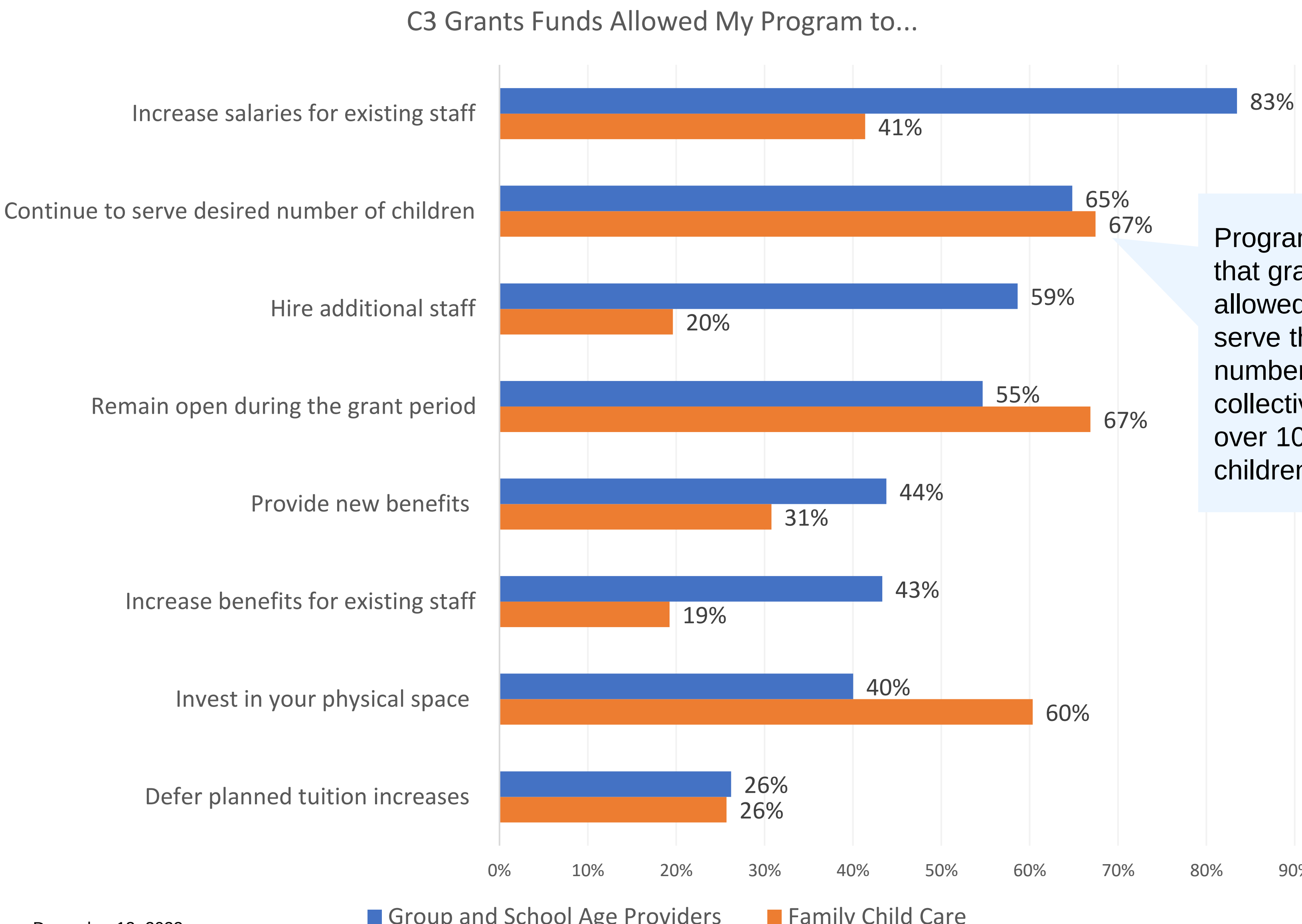
Response rates by region range from 76% on the Southeast and Cape to 82% in Western MA.

*Note: For purposes of this survey analysis, "serve children with subsidies" is defined as a program that served a child with a subsidy in Feb 2020, May 2021, Nov 2021, March 2022, June 2022, and/or Sept 2022, as these are the points in time incorporated into the C3 formula.

Commonwealth Cares For Children (C3)
Program Update & Preliminary Survey Findings

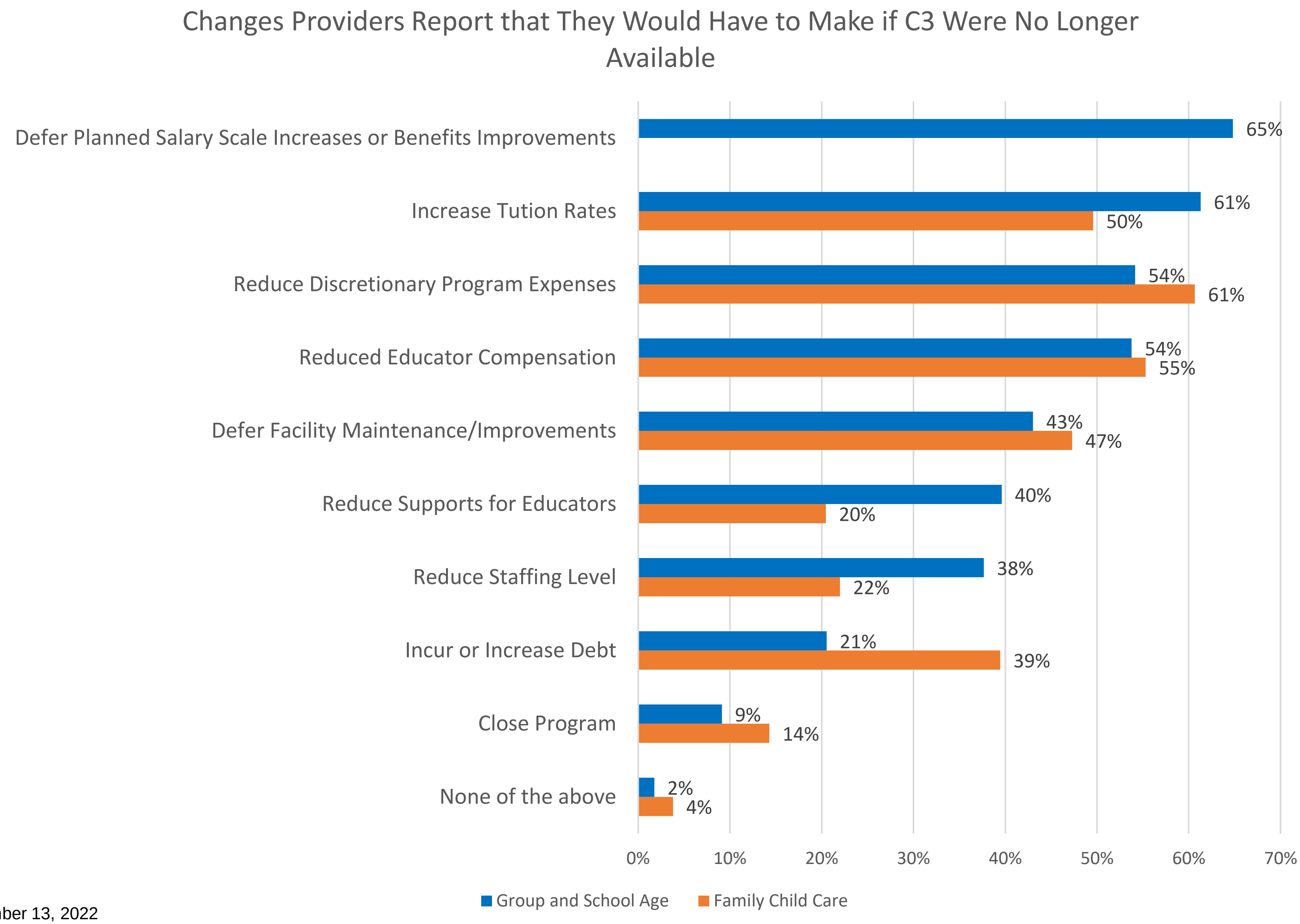
Overall Impact of C3

C3 funds have helped programs remain open and serving children, hire staff, invest in staff and facilities, and defer family tuition increases



Programs that report that grant funding allowed them to serve their desired number of children collectively serve over 100,000 children.

Families and educators would be significantly impacted if C3 funds were no longer available



Many programs report that they would close if C3 funds were no longer available

Across the **751 providers** that report that they would have to close…

15,078
licensed seats

38%
are in the highest SVI communities (SVI > 0.75)

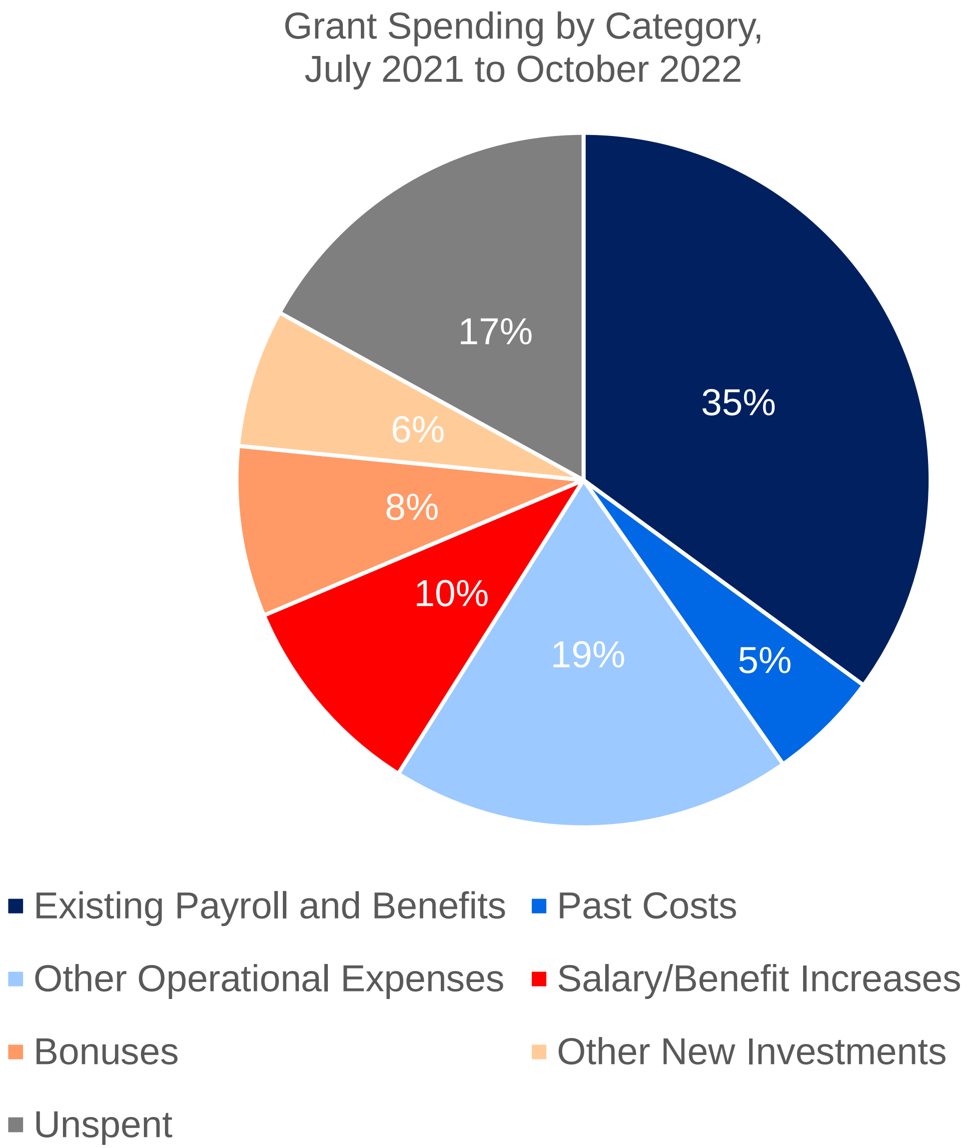
65%
serve children with subsidies

74%
are family child care providers

35%
do not serve children with subsidies

Commonwealth Cares For Children (C3)
Program Update & Preliminary Survey Findings
C3 Program Expenditures

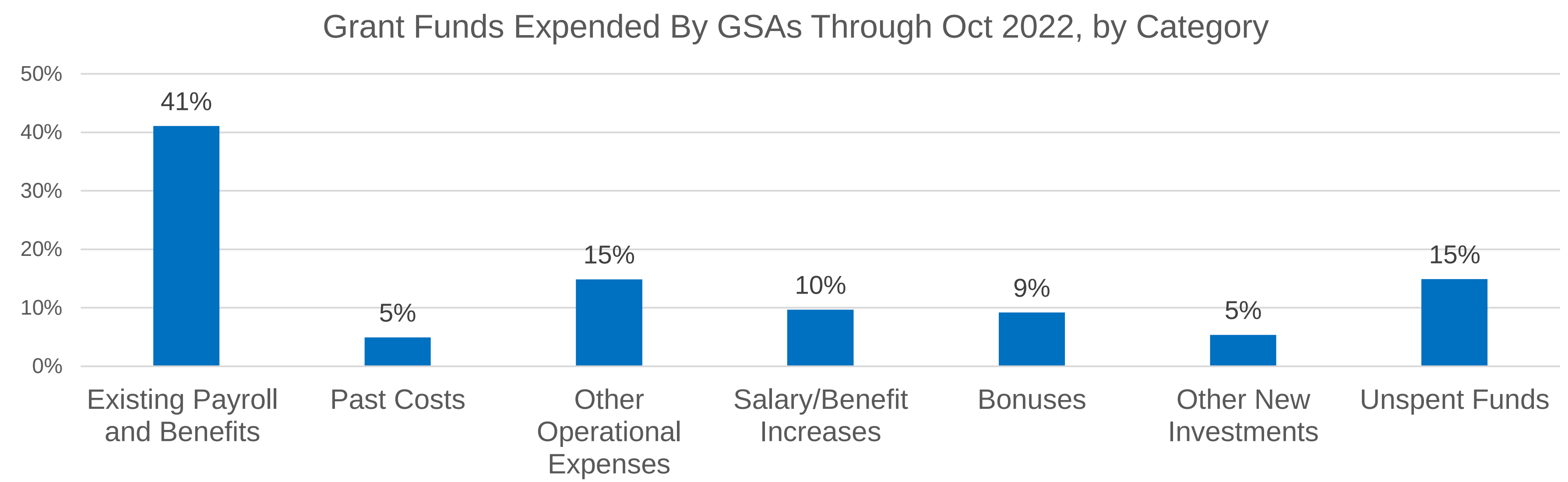
Providers continue to spend the majority of C3 funding on existing operational expenses

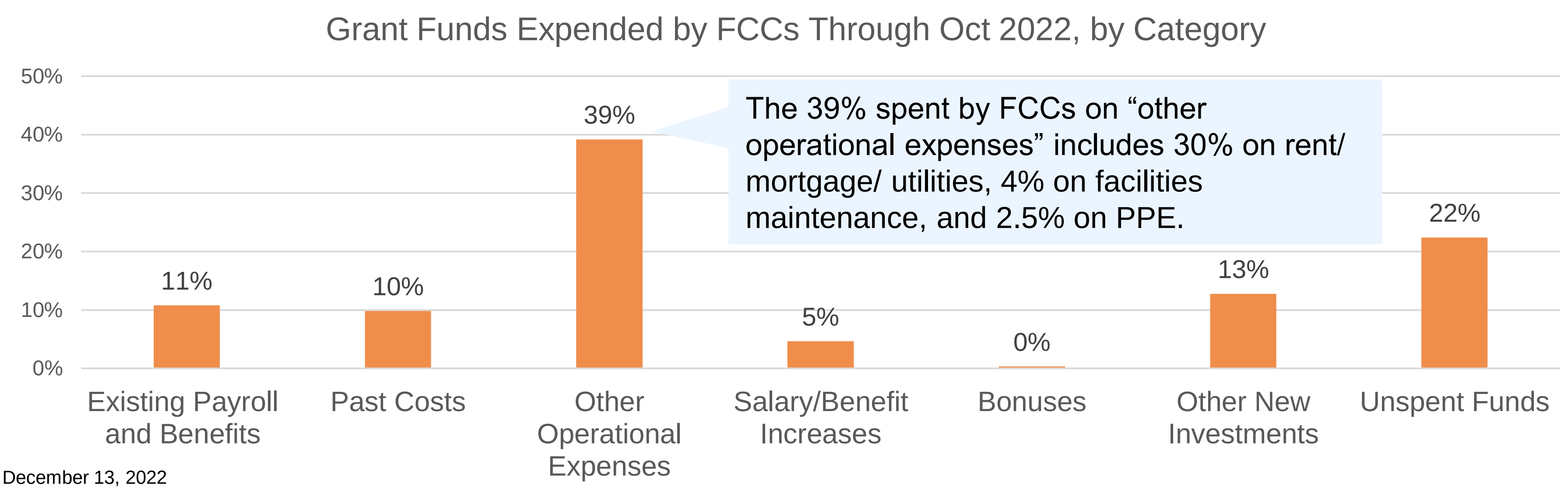


Operational Spending
To date, providers have spent almost 60% of all grant funds awarded on operational expenses (compared to 66% at the same time last year).

New Investments
Providers have invested 24% of grant funding in new investments (compared to 20% at the same time last year).

Operational Investments Vary By Program Type

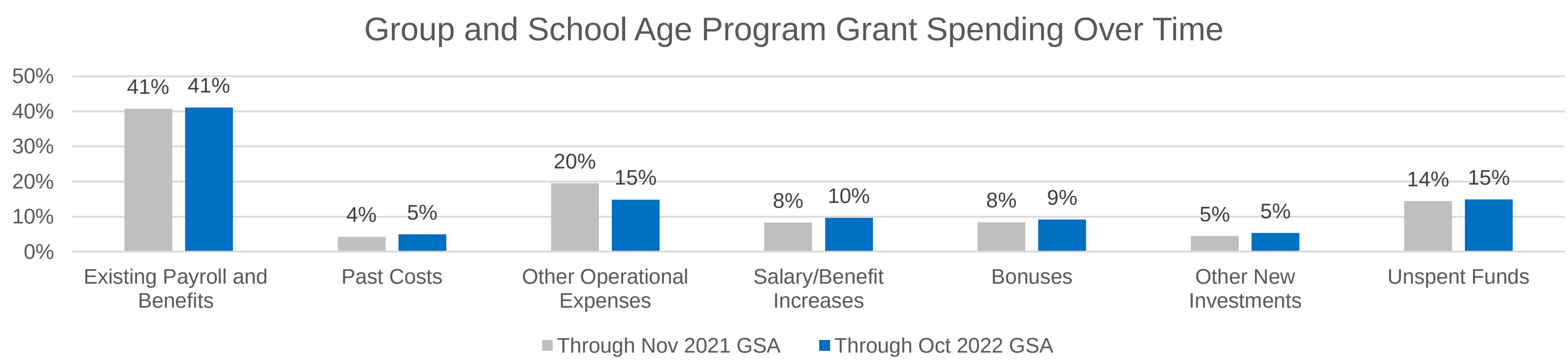


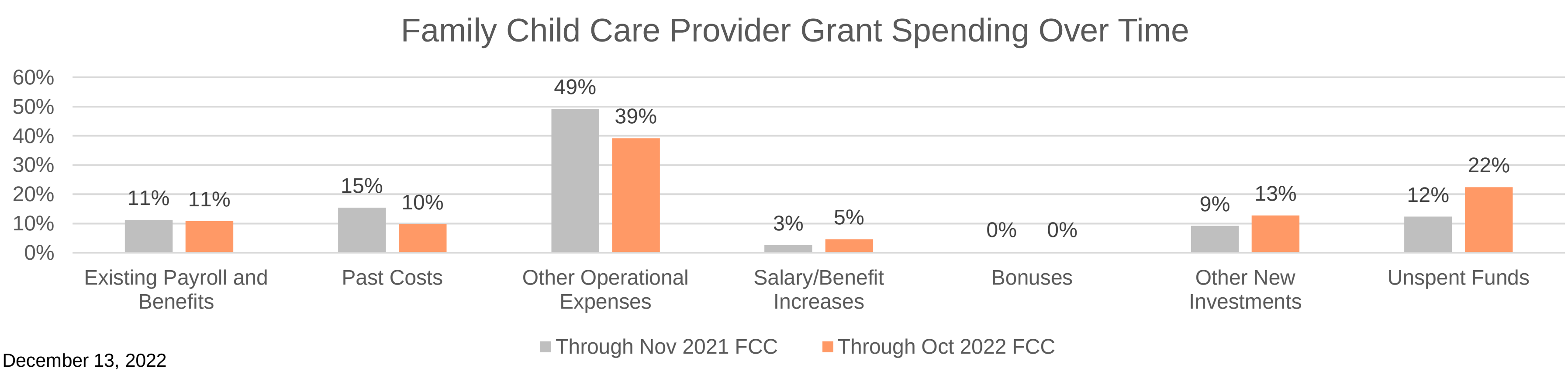


The 39% spent by FCCs on “other operational expenses” includes 30% on rent/ mortgage/ utilities, 4% on facilities maintenance, and 2.5% on PPE.

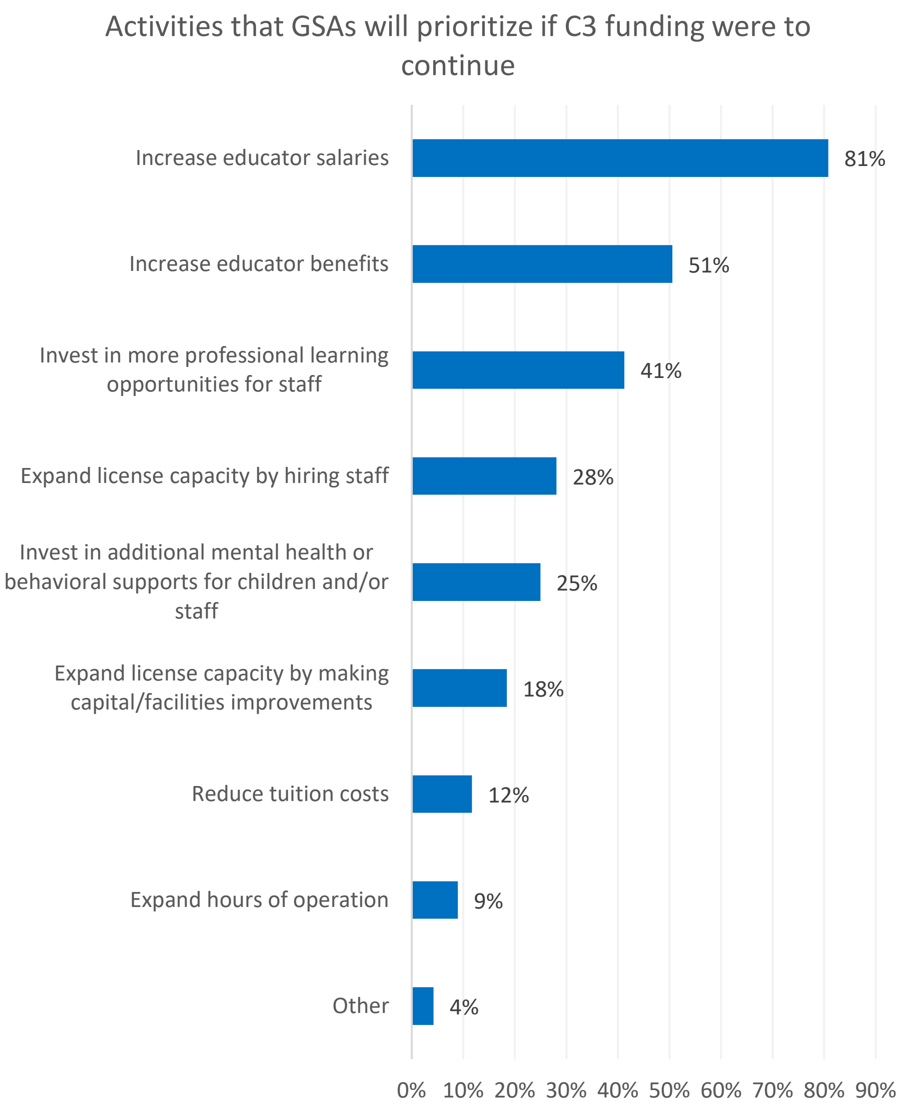
Spending patterns are consistent over time, with a slight shift from expenditures on existing operations to new investments

Overall, GSA programs continue to spend the largest share of C3 funds on existing payroll and benefits. Across program types, a smaller share of grant funds are being spent on other operational expenses (e.g., rent, mortgage, utilities, supplies) and GSA programs are spending slightly more funds on compensation increases over time.

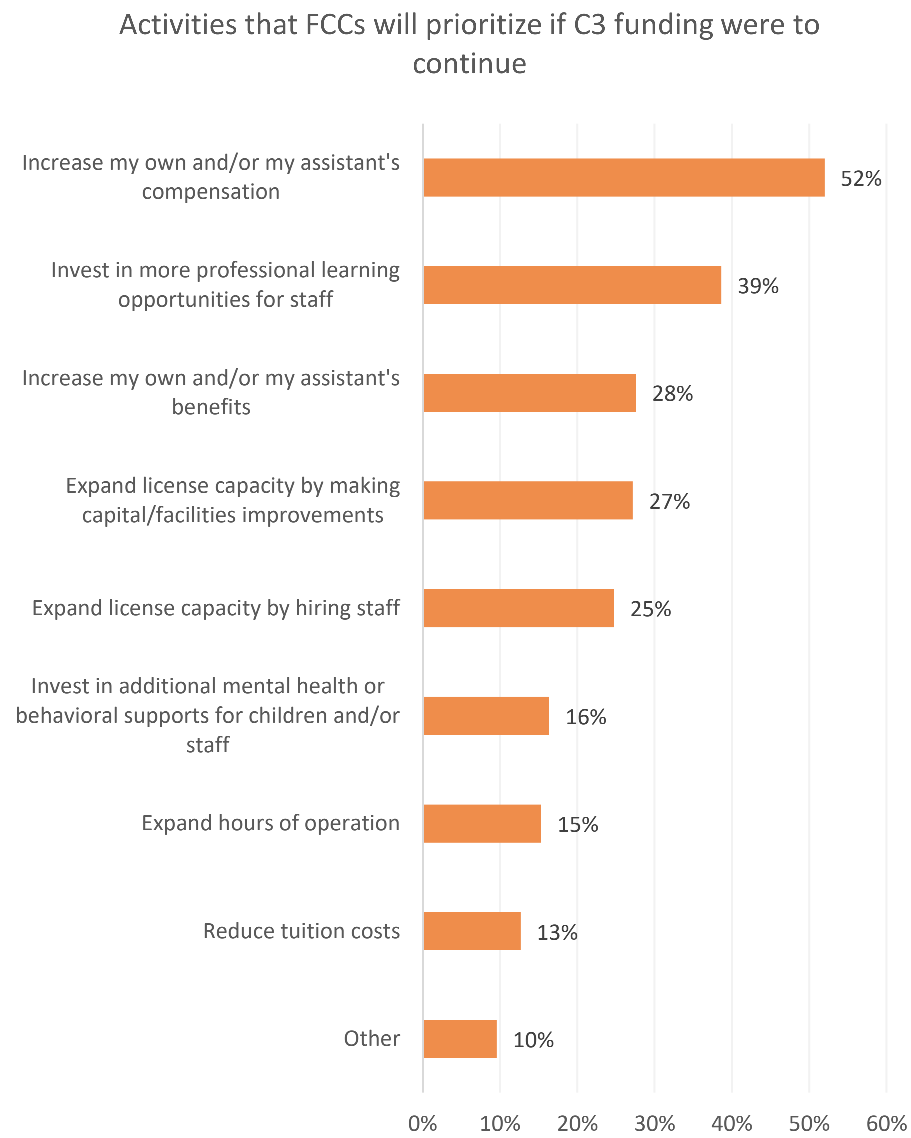




Most providers report that they would prioritize educator compensation and professional learning if the grant is extended



n = 2,103

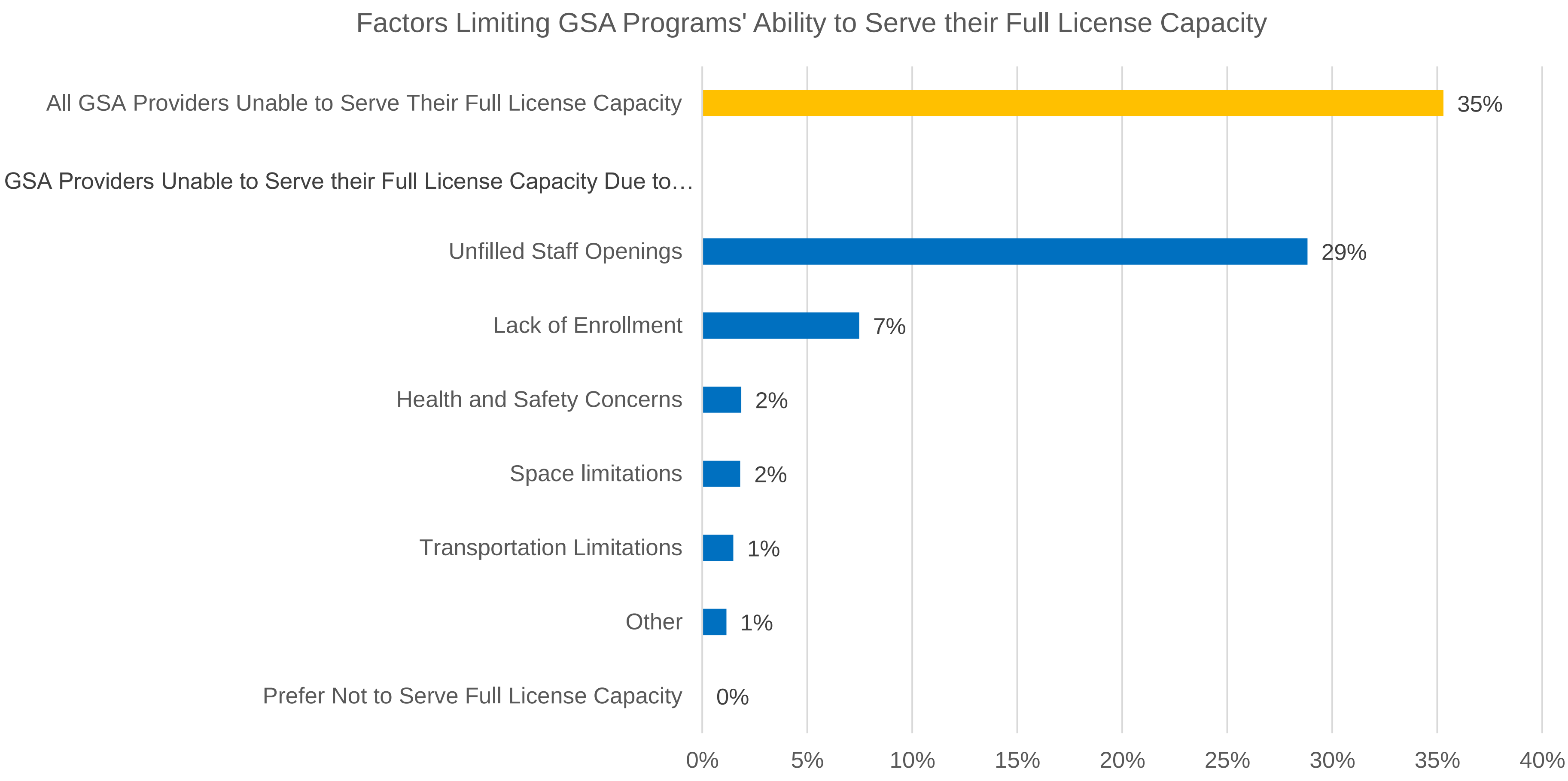


n = 3,907

Commonwealth Cares For Children (C3)
Program Update & Preliminary Survey Findings
Capacity, Staffing and Compensation

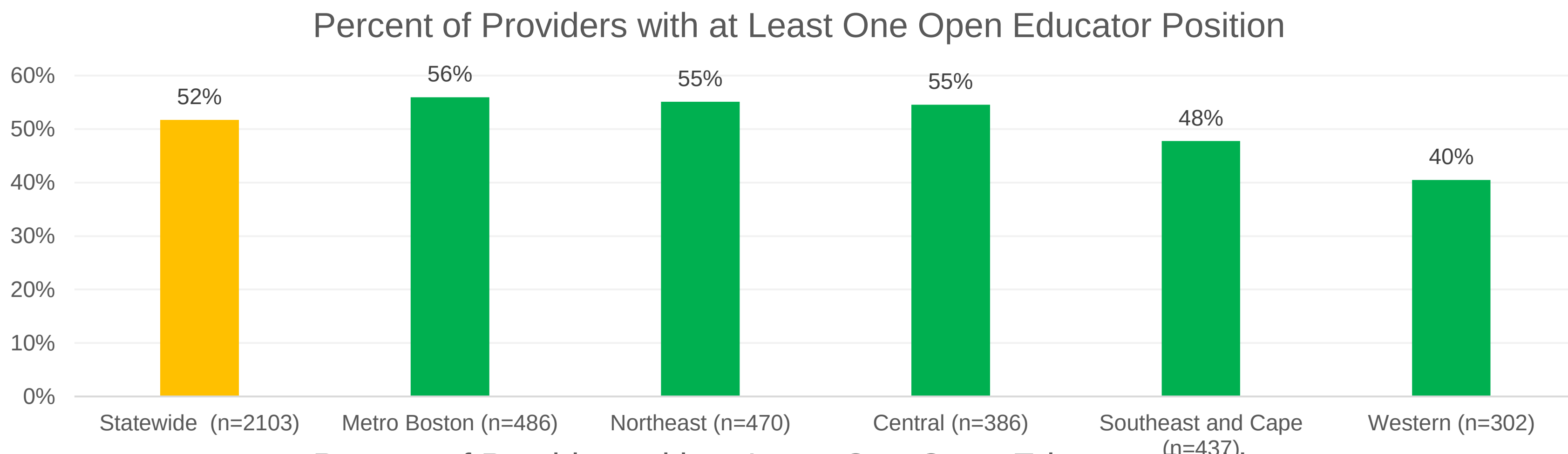
Overall, more than one-third of GSA providers report being unable to serve their full license capacity

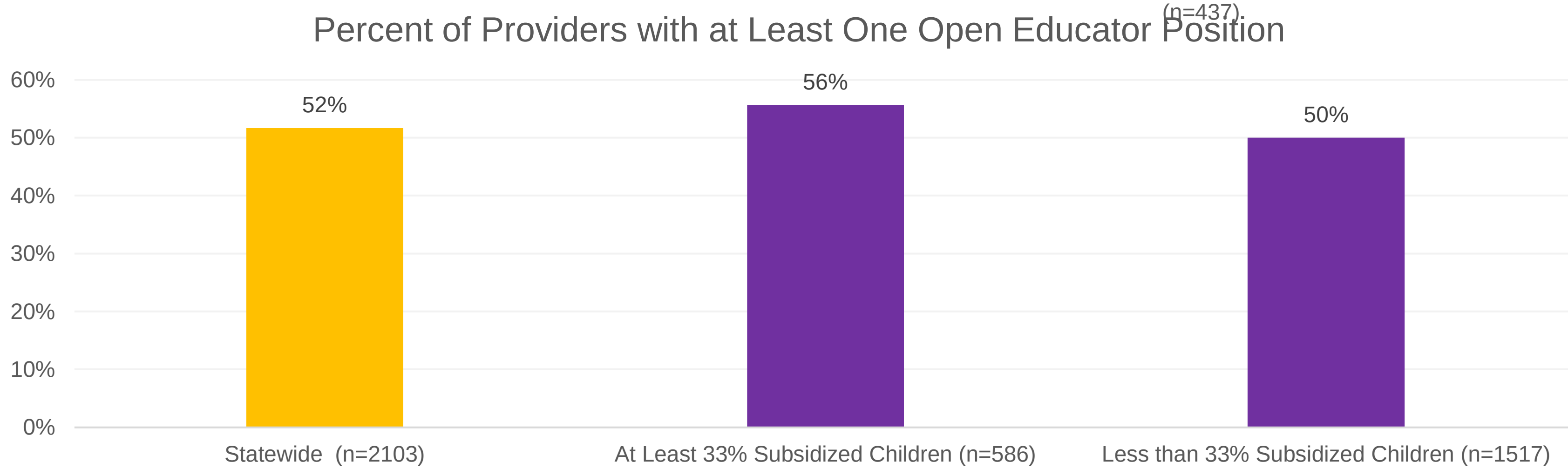
The proportion of GSA providers that **are unable to serve their full capacity has increased** since the spring (from 28% to 35%). If these programs were fully staffed, they **could serve between 10,000 and 15,000 more children**.



Providers Continue To Report Staffing Shortages

More than half (52%) of GSA programs report that they are currently hiring for at least one open educator position. Among these programs, the average program is hiring for 3.6 positions.



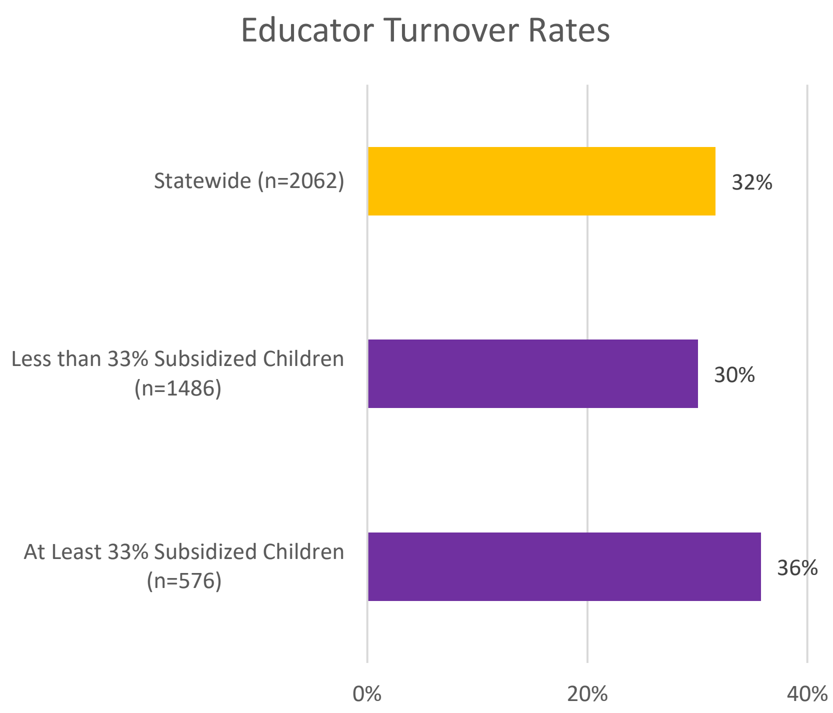


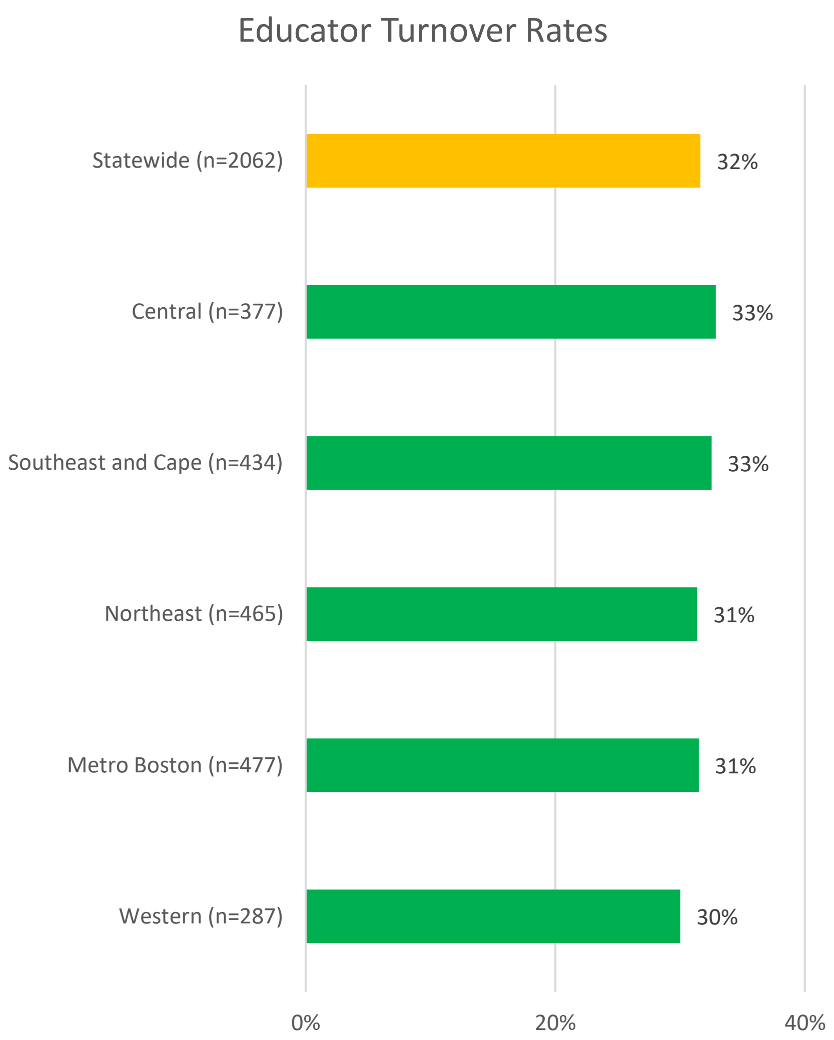
About 12% Of All GSA Positions Statewide Are Currently Open

Role	Number of Open Positions Statewide	Percent of All Open Positions Statewide	Percent of All Positions that are Currently Open
Teacher	2,022	51%	12%
Assistant Teacher	1,219	31%	17%
Group Leader	393	10%	14%
Assistant Leader	175	4%	12%
Site Coordinator	53	1%	6%
Center Director	45	1%	2%
Program Administrator	28	1%	3%
All Positions	**3,935**	**100%**	**12%**

Providers report 2,022 open teacher positions, which make up 51% of all open positions and 12% of all teacher positions statewide.

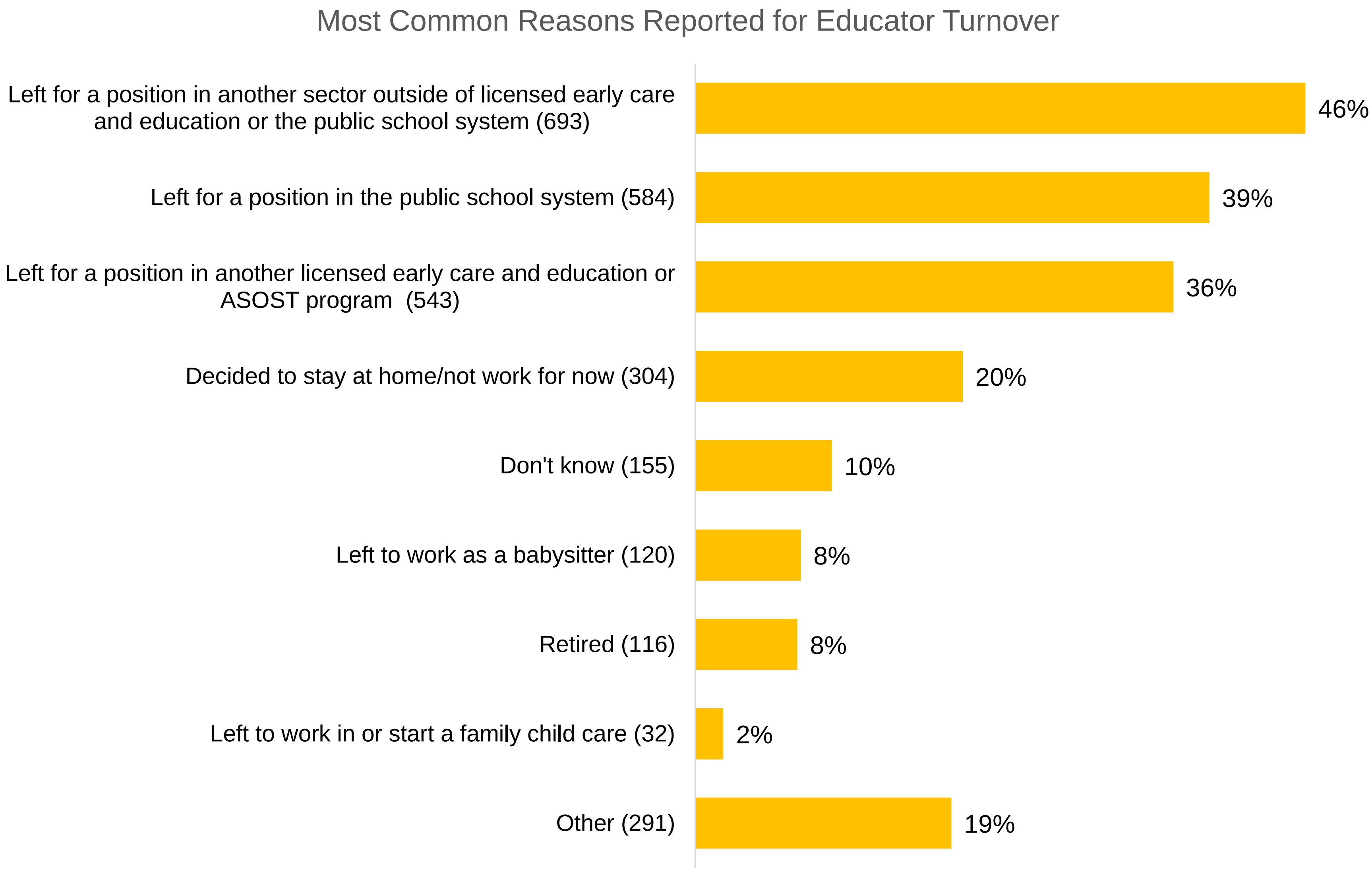
Almost 1/3 of educator positions have turned over in the past year





Educator turnover: The % of educators (all educator roles) employed 12 months ago who are no longer employed by the program.

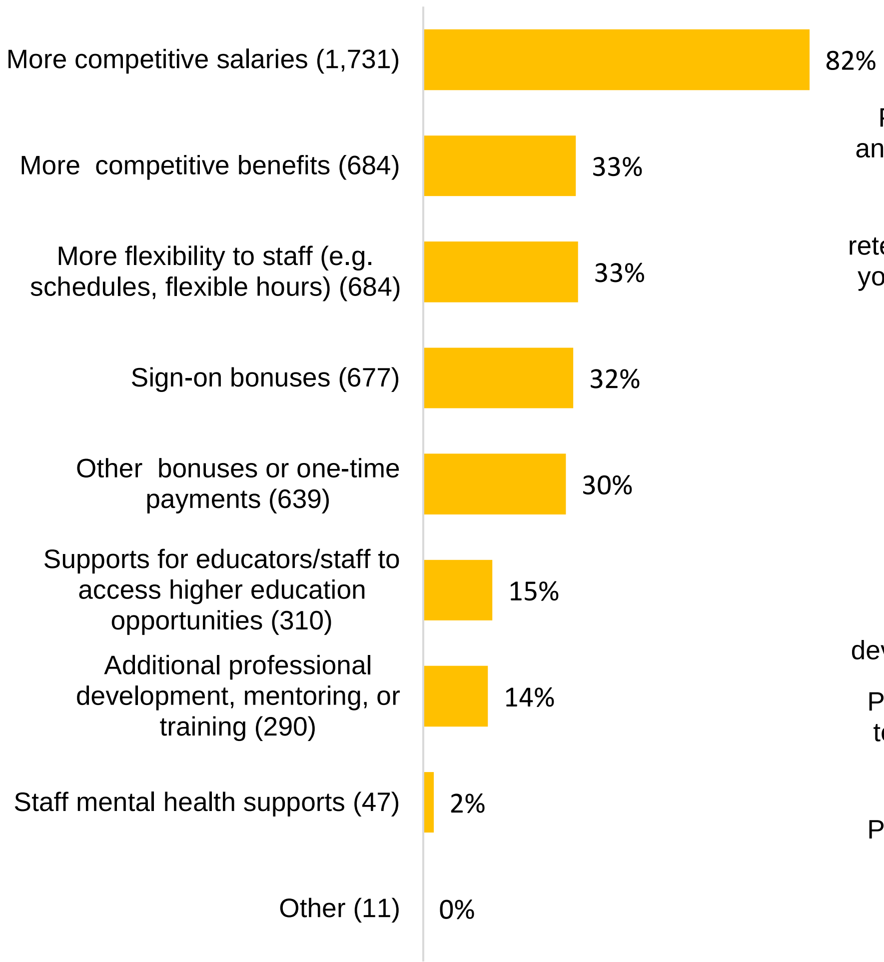
Providers report losing educators to opportunities outside of the ECE system, as well as to public schools and other ECE programs



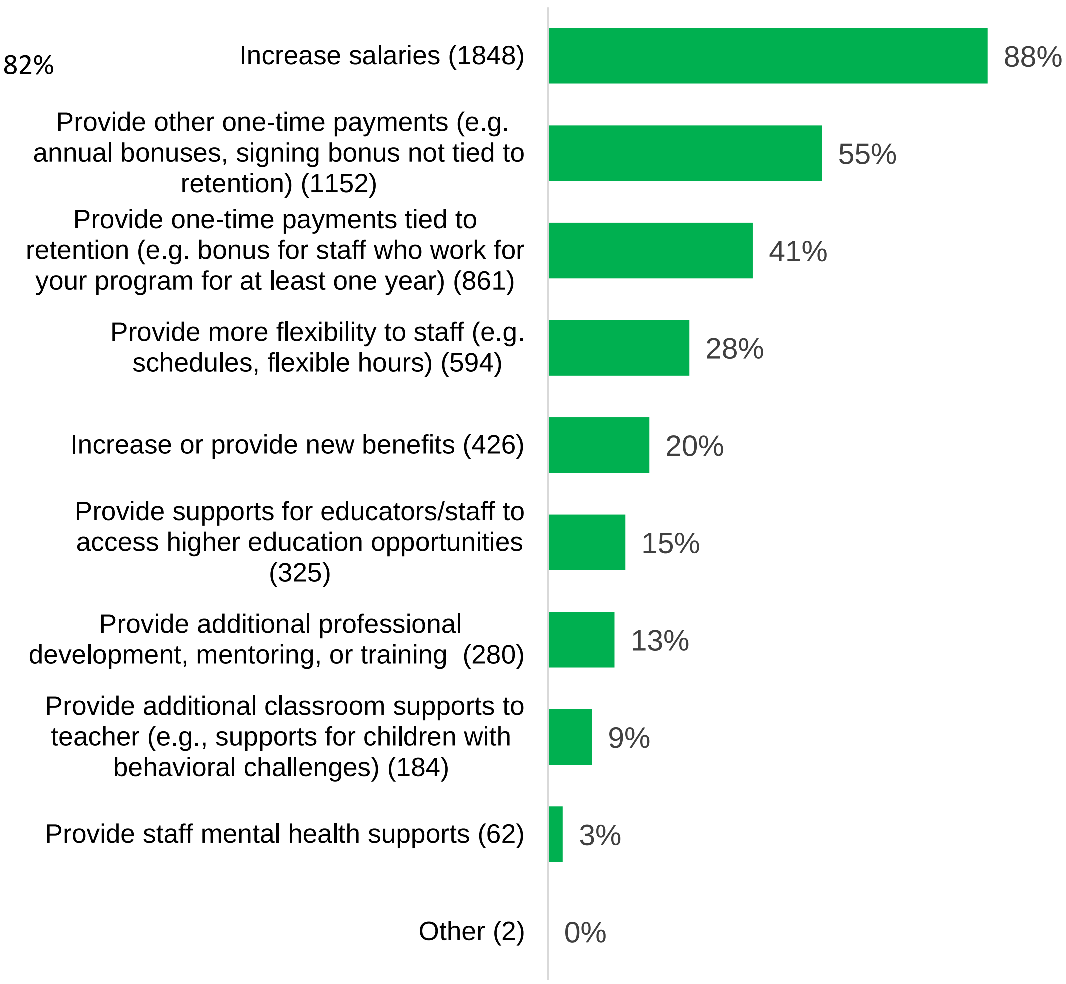
Note: Providers were able to select up to three most common reasons for which educators left their programs.

The most frequent recruitment and retention strategy is improving staff compensation

Strategies to Recruit New Staff (N = 2103)



Strategies to Retain Staff (N= 2103)



Most GSA providers increased educator salaries since July 2021

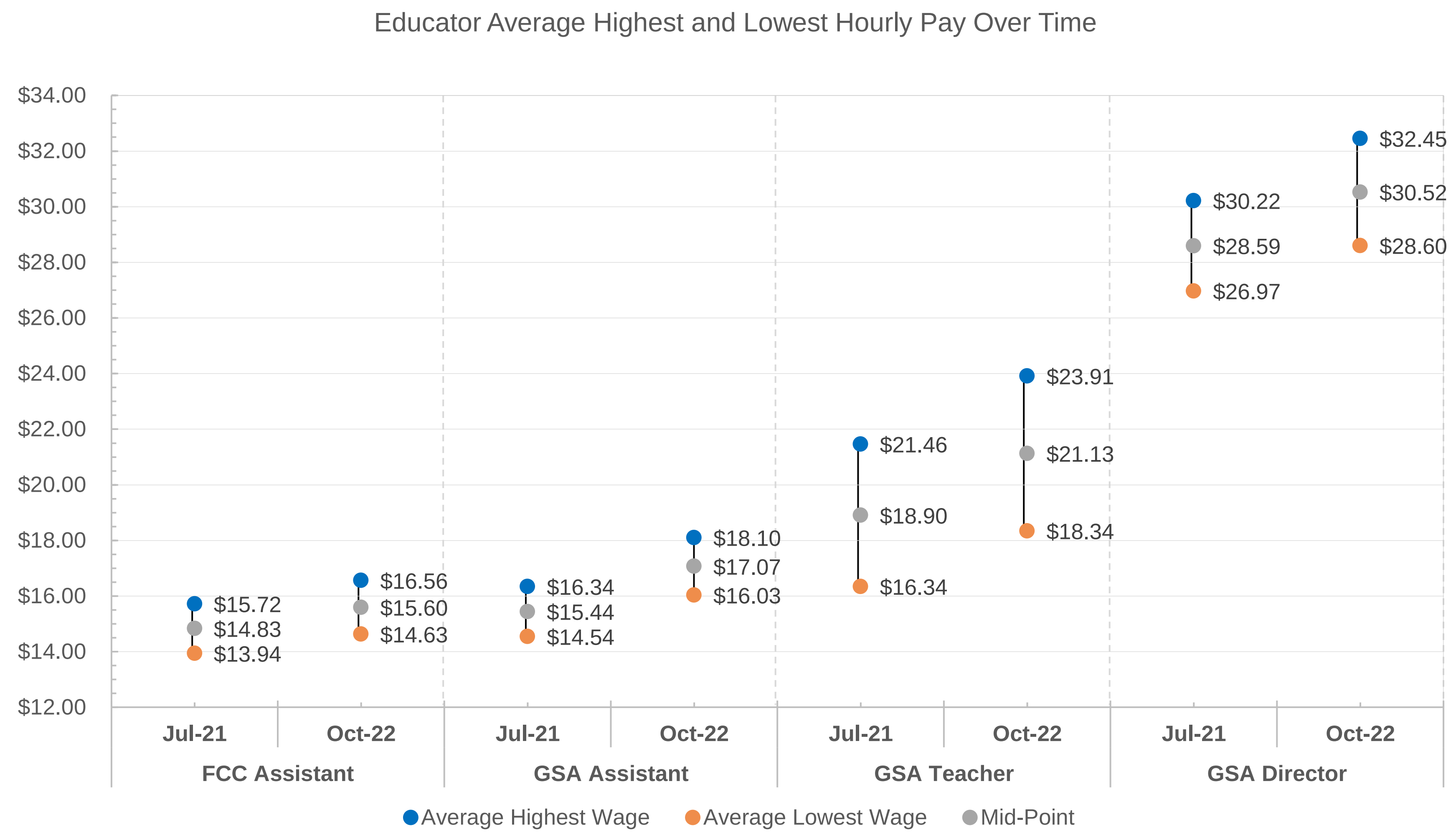
Almost all (94%) of GSA programs provided salary increases (with C3 funds and/or funds from other sources). Just under two-thirds (62%) used C3 funds to increase salaries and just over two-thirds (68%) of GSA providers provided salary increases to all educators.

Provided salary increases to all educators	Targeted salary increases by role (e.g. assistants, teachers)	Targeted salary increases by years employed at my program	Targeted salary increases to degrees or other professional accomplishments/ credentials	Targeted salary increases by performance
68%	**14%**	11%	6%	10%

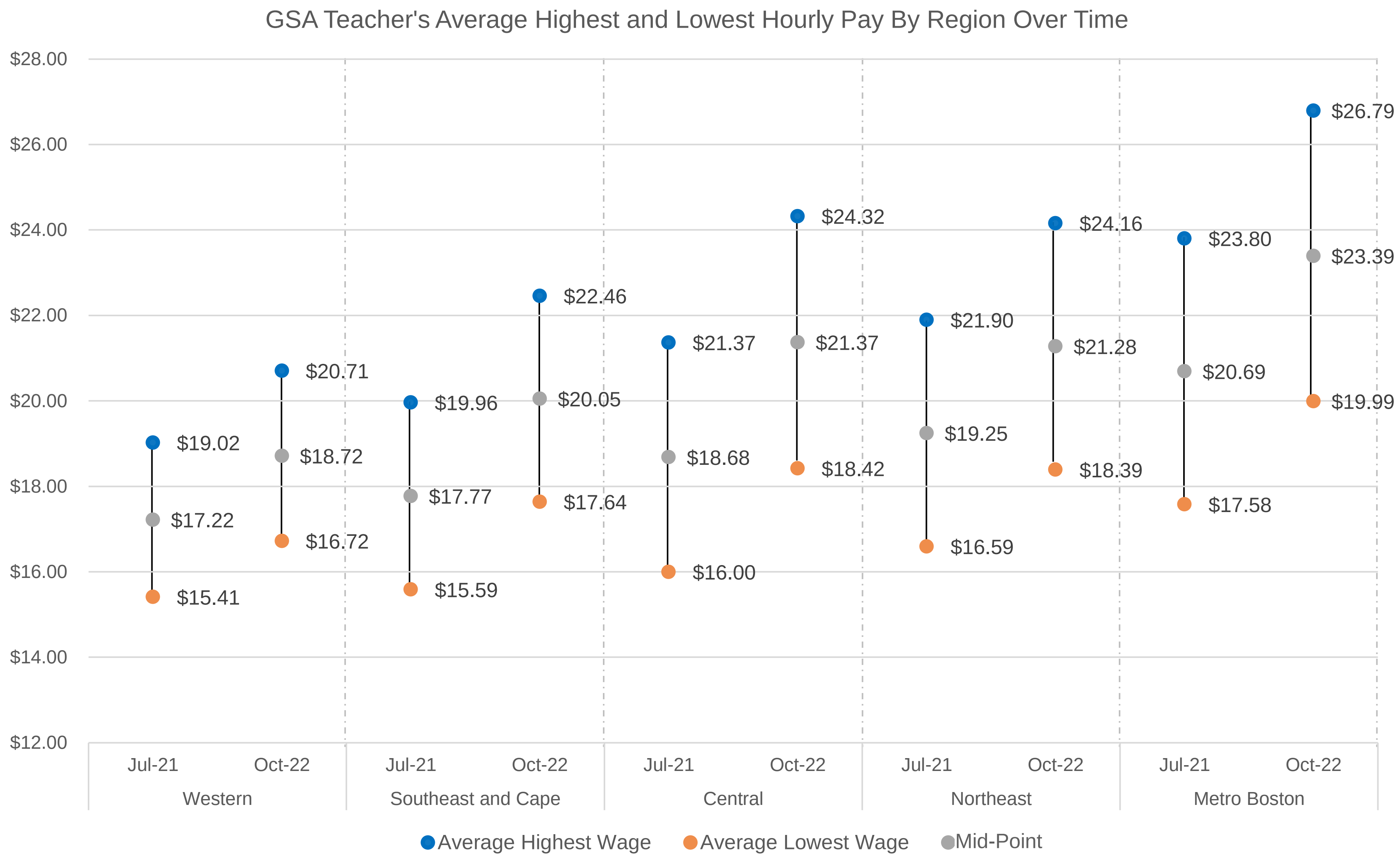
Of the 14% of providers that targeted salary increases based on roles, most targeted salary increases to Teachers, Assistant Teachers, and/or Center Directors.

Assistant Teacher	Teacher	Center Director	Site Coordinator	Program Administrator
60%	**86%**	**42%**	20%	20%

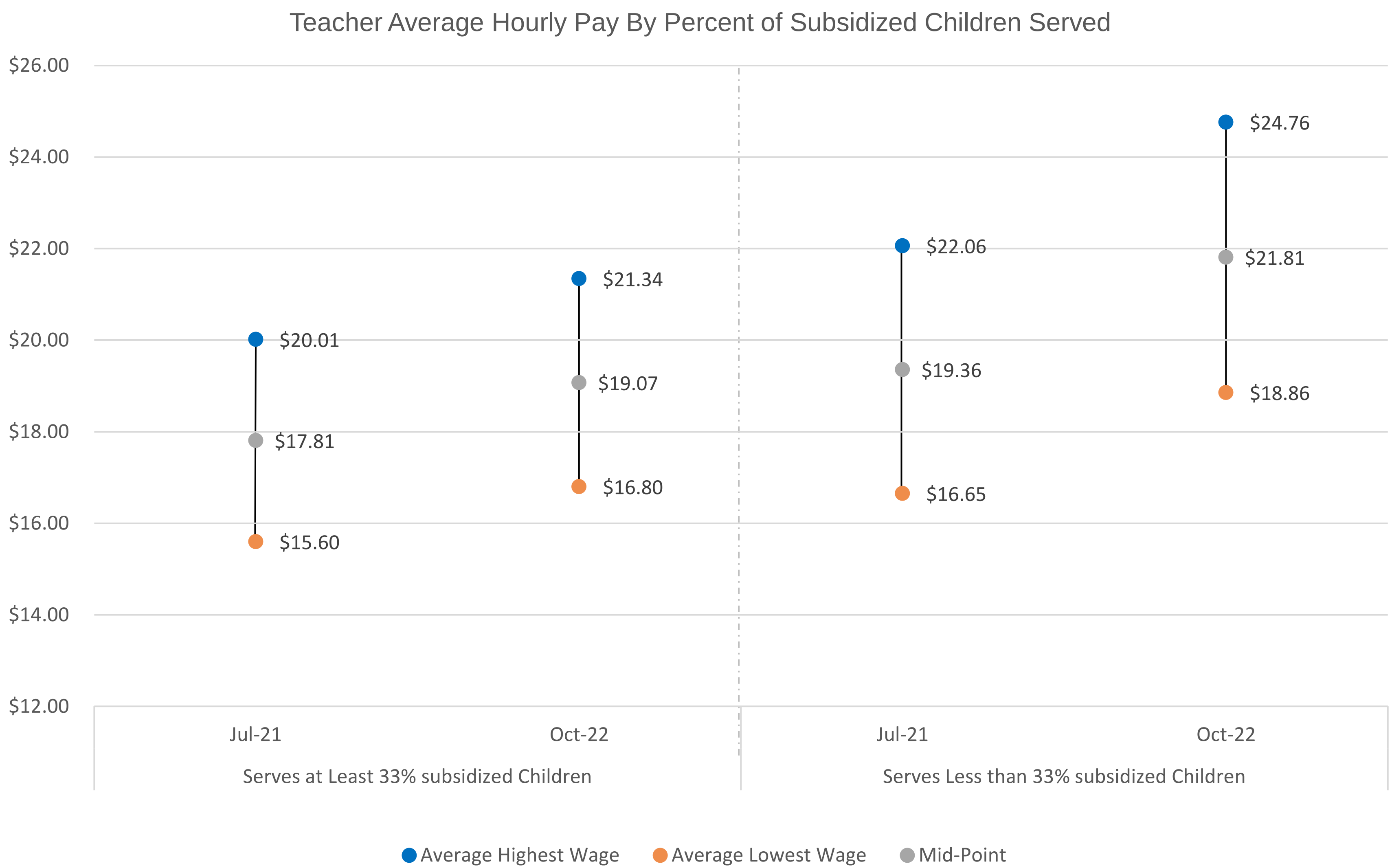
Educator hourly pay is increasing over time yet remains low



Educator hourly pay varies by region

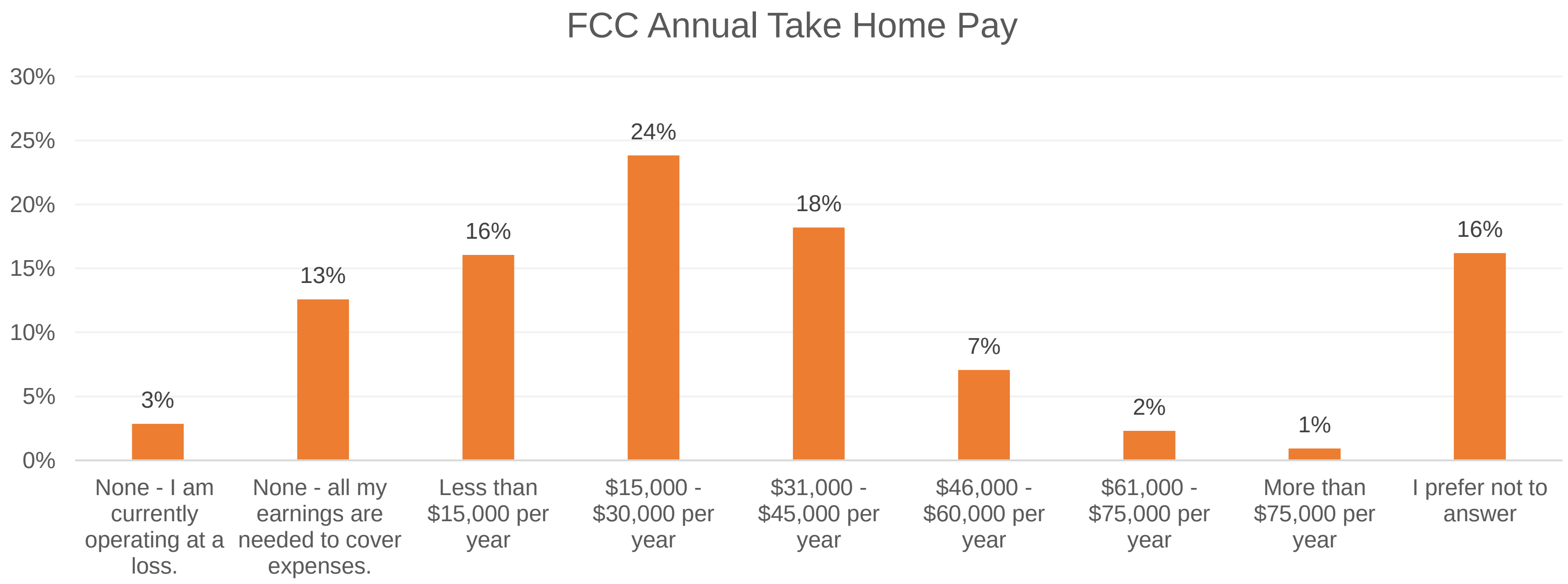


Educator hourly pay is lower in programs that serve more subsidized children



FCCs report low annual take home pay and long hours

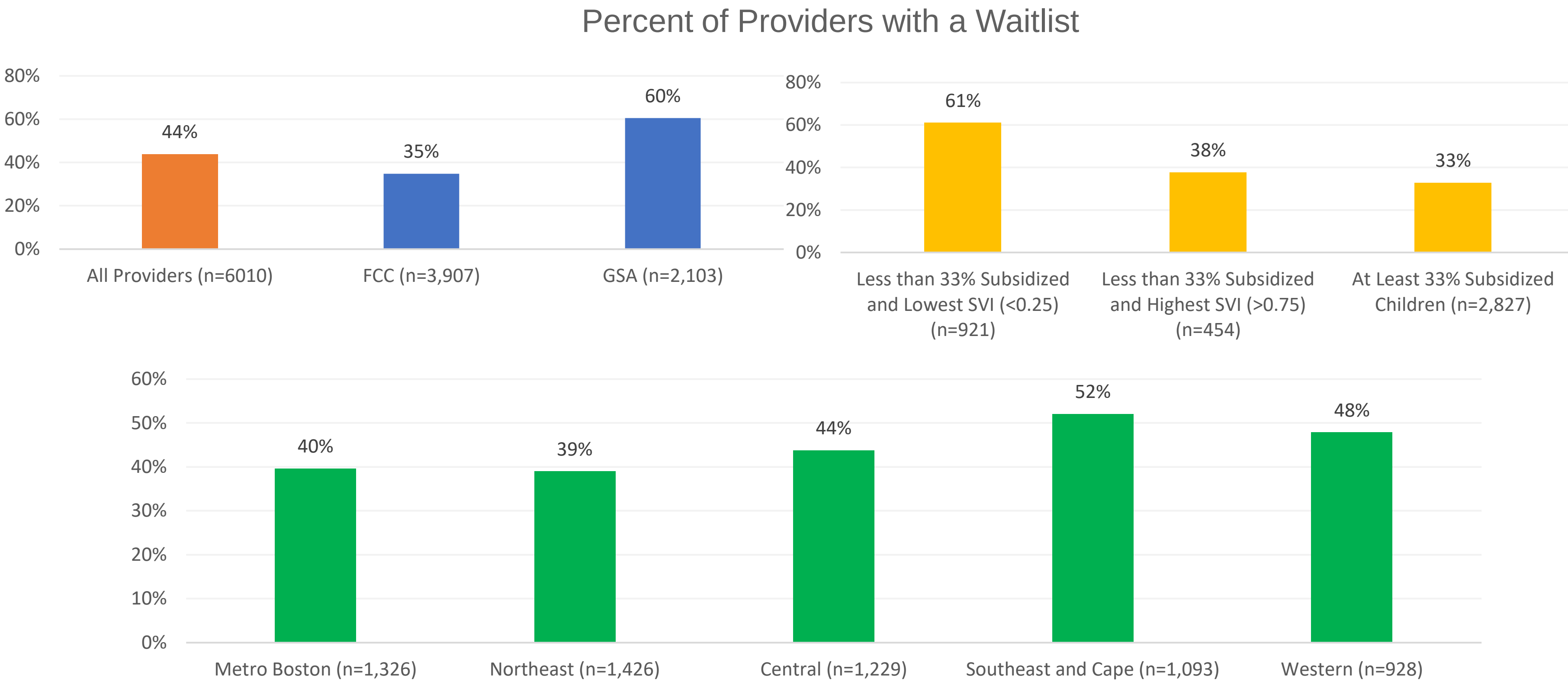
About one-quarter of FCC providers report **earning between $15,000 and $30,000 per year**, after subtracting all bills and expenses, and 16% (more than 600) report either operating at a loss or using all earnings to cover expenses.



More than half (53%) of FCC licensees report **spending between 41 and 50 hours per week with children**, and almost half (45%) report an additional **6-10 hours per week on other tasks** related to running their program outside of their time with children

Commonwealth Cares For Children (C3)
Program Update & Preliminary Survey Findings
Family Access and Enrollment

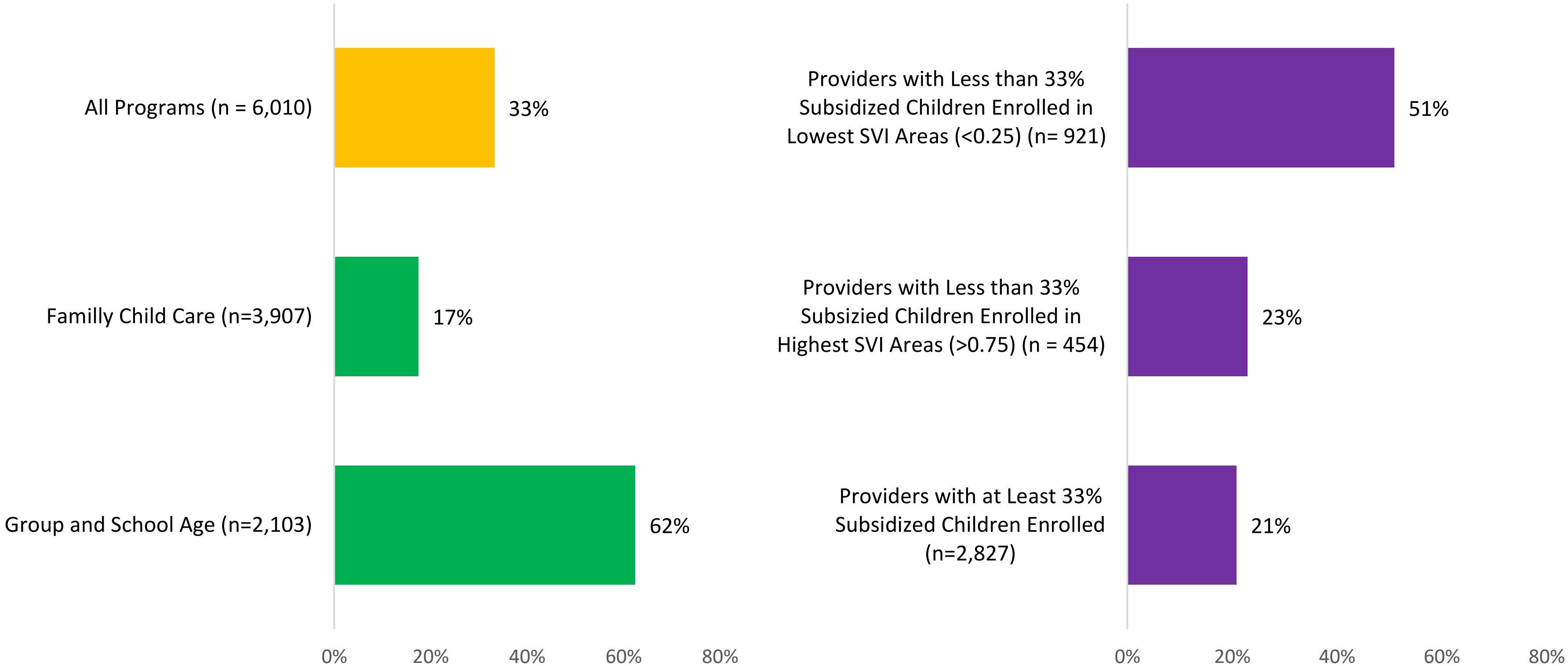
Almost half of providers have a waitlist for enrollment



While 44% of providers statewide report having a waitlist, they are more common among GSA providers (compared to FCCs), as well as for providers with lower subsidy enrollment in the lowest SVI areas.

FCCs that have a waitlist for enrollment report an average of **9 children on the waitlist**, and **GSAs** that have a waitlist report an average of **43 children on the waitlist**.

About one-third of programs have raised tuition in the past year

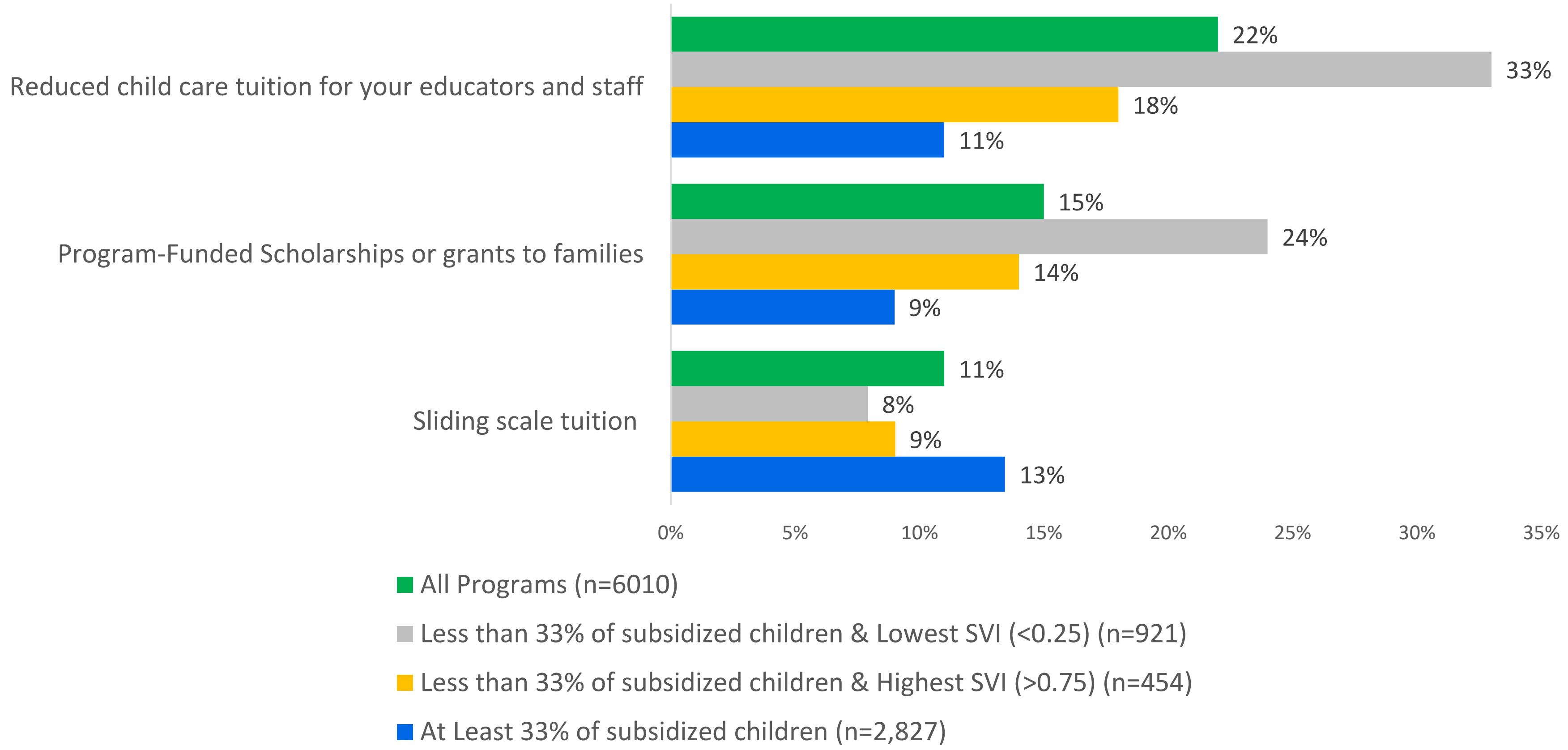


Across all provider types, most providers **report raising tuition rates between 0-5%** and that they do not raise tuition on a consistent schedule.

During recent focus groups, **programs (particularly FCC providers) noted that they do not want to increase tuition rates for families** and emphasized the importance of stable tuition rates to support families.

Almost half (44%) of programs report providing financial assistance to families beyond EEC subsidies

Types of financial assistance provided to families include….



Providers located in lower SVI areas that serve a smaller proportion of subsidized children are more likely to provide other types of additional financial assistance to families, including program-funded scholarships and reduced child care tuition.

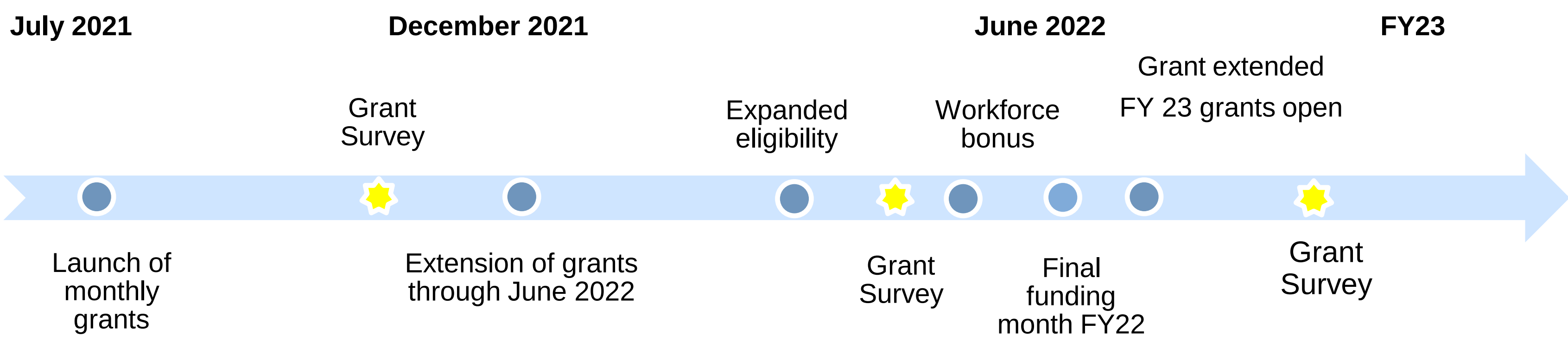
Commonwealth Cares For Children (C3)

C3 Funding Allocation and FY23 & FY24 Planning

Commonwealth Cares for Children (C3) Timeline & Funding Update

7,155 programs have received C3 funding to date

~$574 million awarded to programs to date



- FY22 grants were funded through a combination of Federal funds from the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) and the American Rescue Plan Act (ARPA).
- Through the FY23 budget, C3 grants were extended into FY23 at $250M, with a combination of ARPA Supplemental funds and state dollars.
- The Economic Development Bill recently passed includes $150M for the C3 program: $90M to support continuation of the grants through at least April 2023; and a $60M set-aside for additional payments to programs serving subsidized families.

*Data as of 11/22/22

C3 Funding Formula

Base Amount

Base Amount =

$83/month per licensed slot **X**

Licensed Capacity **X**

Staffing Level Adjustment

+

Equity Adjustment

Equity Adjustment

Level 1: (Base Amount **X** *30%*) for programs serving high need communities

Level 2: (Base Amount **X** *40%*) for programs serving highest need communities

=

Monthly payment

Base Amount
Eligible providers receive a base amount of $83.33/ month for each licensed seat in their program (or 10 seats for all FCCs).

Staffing Level Adjustment
GSA providers receive staffing level adjustment based on the ratio between the number of FTEs employed and minimum required by regulations to serve their license capacity. FCC providers receive an additional 1.5X their base amount for a part-time assistant and additional 2X for a full-time assistant.

Equity Adjustment
If a provider is located in a high SVI census tract or zip code and/or if a provider serves between 1/3 to 2/3 of its license capacity with children receiving subsidies, their base amount per slot and staffing adjustment is multiplied by 1.3. If a provider is in a highest SVI census tract or zip code and/or serves more than 2/3 of its capacity with children receiving subsidies, their base amount per slot and staffing adjustment is multiplied by 1.4.

C3 Expenditures to Date
By Provider Type and Subsidized Children Served

	Total Grant Funds Approved*	Total Grant Funds Via Equity Adjustment	Percent of C3 Funds Resulting From Equity Adjustment	Total Number of Providers Receiving Grants	Percent of All Providers Receiving Grants
All Providers	**$560,681,747**	**$119,512,215**	**21%**	**7,155**	**100%**
FCC Providers	$100,296,487	$25,189,491	25%	4,516	63%
GSA Providers	$460,385,260	$94,322,724	20%	2,639	37%
Providers Serving Children with Subsidies	$358,307,437	$85,267,785	24%	4,425*	62%
Providers NOT Serving Children with Subsidies	$202,374,310	$34,244,430	17%	2,730	38%

Data as of 11/22/22. Table includes funds disbursed as part of the monthly application process and does not include one-time 2022 workforce bonus payments.
*This number includes providers who served a child with a subsidy at any point in the grant period.

C3 Expenditures to Date
By Region

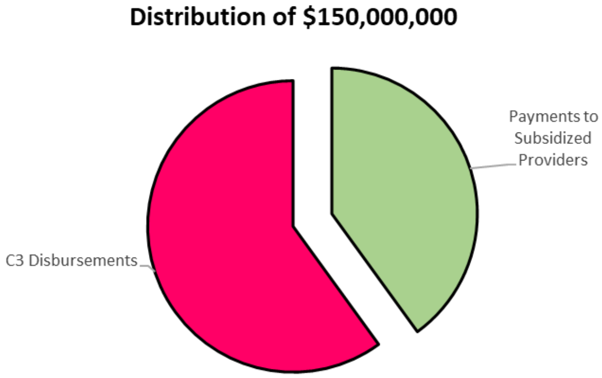
	Total Grant Funds Approved*	Total Grant Funds Via Equity Adjustment	Percent of C3 Funds Resulting From Equity Adjustment	Total Number of Providers Receiving Grants	Percent of All Providers Receiving Grants
All Providers	**$560,681,747**	**$119,512,215**	**21%**	**7,155**	**100%**
Central**	$104,961,119	$17,660,447	**17%**	1,424	20%
Metro Boston	$129,065,482	$30,555,758	**24%**	1,576	22%
Northeast	$137,459,110	$30,063,338	**22%**	1,727	24%
Southeast and Cape	$108,927,547	$21,418,931	**20%**	1,316	18%
Western	$71,617,132	$17,847,358	**25%**	1,072	15%

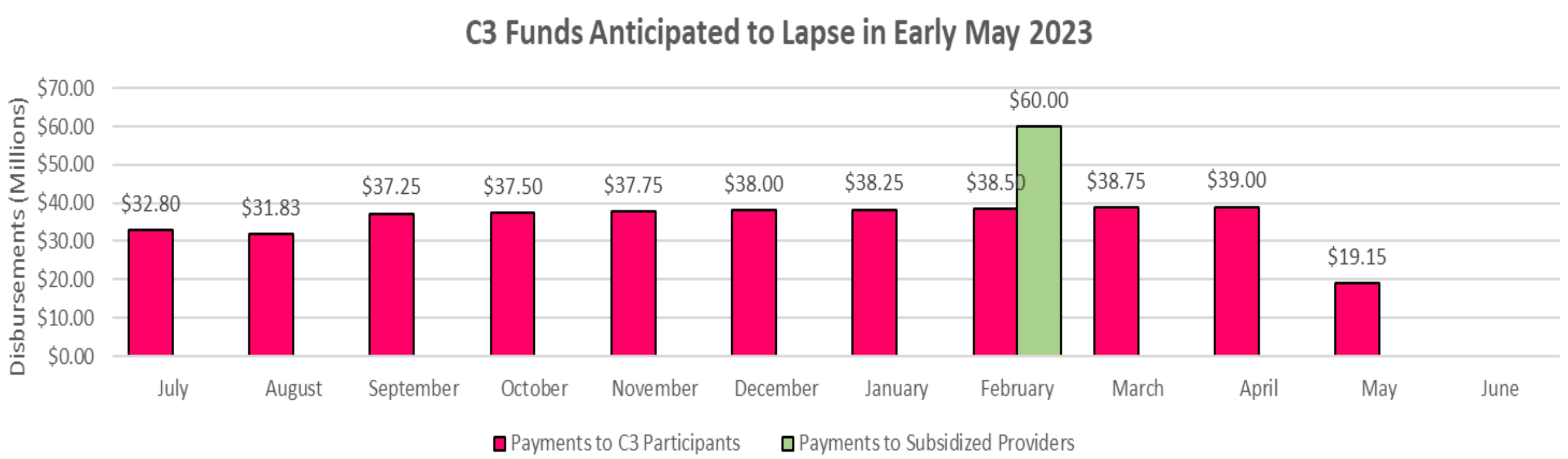
*Table includes funds disbursed as part of the monthly application process and does not include one-time 2022 workforce bonus payments.
** Data by licensing region does not include license exempt Boys and Girls Clubs, as they are not assigned to an EEC licensing region.
*** Data as of 11/22/2023

Economic Development Bill – C3 Funding Implications

Adds $150,000,000 to 3000-1047

provided that *<u>not less than $60,000,000</u>* shall be made available as grants to providers serving subsidized children, calculated using an equal amount per subsidized child served by each provider, including children receiving both Head Start and subsidy





Note: Subsidized providers will continue to be eligible for C3 disbursements as long as they are available

Key Learnings: Summary

- Programs are relying on C3 funds to support core operational expenses and maintain capacity for working families.
  - A significant number of programs report they would close without C3 funds.
- C3 is supporting new investments in the workforce through increased compensation, benefits, and professional development.
- C3 has helped programs mitigate the need for tuition/fee increases in the face of significant rising costs, benefiting a broad range of working families.
- C3 has directed additional investment into programs serving low-income families: both families receiving subsidies and those living and/or working in socially vulnerable communities that are not accessing subsidies.
- Programs have been reluctant to make systemic investments (e.g., increase salary scales) with C3 funds due to one-time/short term nature of the funding to date.

Planning for FY24: Design Considerations

- Eligibility criteria
  - Evidence that field continues to rely on this grant suggesting broad-based eligibility remains important
- Funding formula
  - Cost modeling will inform more in-depth review of extent to which the per slot amount and staffing adjustments account for differential in costs vs. revenues across ages, program types, regions and for programs serving families with EEC subsidies
- Additional design considerations
  - Consider structuring grant to better support longer term investments that address workforce challenges, such as salary increases
  - Consider strengthening relationship between C3 funding and family affordability and access
  - Develop data collection plan to inform ongoing understanding of the broad early education and care sector and C3 grant decision points