Office of Consumer Information and Insurance Oversight

**State Planning and Establishment Grants for the
Affordable Care Act's Exchanges**

Minnesota Quarterly Project Report

Date: 10/31/2011

State: Minnesota

Project Title: State Planning and Establishment Grants for the Affordable Care Act's Exchanges

Project Quarter Reporting Period: Quarter 3 (7/1/2011– 9/30/11)

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Award number: 1 HBEIE110058-01-00

Date submitted: 10/31/2011

Project Summary

Please provide a narrative description (about 5-10 sentences) describing your progress so far in planning activities under each core area. We would like to know what activities you have undertaken to date and what you plan to undertake in the next quarter. Please refer to the Reference section at the end of this template for some examples of what you could include under each core area.

Core Areas

❖ **Background Research** – *May include research to determine the number of uninsured in the State including, but not limited to, those potentially eligible for the Exchange, and those eligible for Medicaid or their employer's coverage and currently not enrolled.*

To understand the requirements, options, costs and coverage impacts of an Exchange, Minnesota entered into a research contract with Jonathan Gruber and Gorman Actuarial to estimate the local impact of insurance market and public program changes and options such as the size of the small group market, merger of the individual and small group markets, and implementation of a Basic Health Plan on enrollment, premium levels, state spending, and overall health care costs. This analysis will inform policy discussions and planning efforts in developing upfront and ongoing cost estimates for IT infrastructure and operations.

Staff from the Departments of Commerce, Human Services and Health have reviewed the draft results. Draft results have also been shared with health insurers and Minnesota's high risk pool (MCHA) that supplied data used in the analysis to discuss testing of sensitivities and assumptions. Final results will be shared in public forums next month, including with the Health Insurance Exchange Advisory Task Force.

❖ **Stakeholder Involvement** – *May include a list of the stakeholders within the State who will be involved in the State's decision about whether to operate the Exchange and planning/ implementation of the Exchange, including the role proposed for each stakeholder as well as agreements with those stakeholders that may be in place at this time. Developing stakeholder involvement may include a plan to gain public awareness and commitment of key stakeholders through task forces and activities in various venues to obtain stakeholders' input.*

In August 2011, Minnesota received Level-One Exchange funding. Part of this funding is being used to establish and operate an Advisory Task Force, under authority granted in Minnesota Statutes §15.014, to provide guidance on the design and development of a Minnesota Exchange. Task Force members were selected this month and include Commissioners of State agencies, consumers, employers, health care market experts, health care providers, health insurers, insurance brokers, counties, organizations with experience assisting people with public programs and legislators. The Advisory Task Force will provide guidance on a number of issues, including but not limited to:
- Size of the small employer market
- Merger of the individual and small group markets

- Establishment of a Basic Health Plan versus Exchange subsidies
- Provisions to avoid adverse selection
- Risk adjustment
- Regulatory simplification
- Cost, quality, satisfaction rating for insurers and health benefit plans
- Navigator program provisions
- Long-term governance
- Ongoing funding mechanisms

Level-One funding was also granted to engage stakeholders via monthly meetings and conference calls and develop a process for consultation with federally recognized tribal governments. Minnesota will start holding monthly open meeting and conference calls with a variety of stakeholders over the next few months. Half (six) of the monthly in-person meetings will take place in the Minneapolis/St. Paul metropolitan area and half (six) of them will be held in various locations throughout Greater Minnesota. In August 2011, Minnesota started regular consultation with representatives of tribal governments in the State.

❖ **Program Integration and IT Infrastructure** – *May include a description of how an Exchange will build on existing State and Federal programs such as Medicaid and CHIP. This may also include current State activities similar to an Exchange. May include the planning for a web portal and/or a call center to meet the increased need for consumer education, the coordination of Medicaid and Exchange-related activities, and the integration of Health Information Exchange standards for program interoperability.*

Minnesota's Exchange planning efforts have included the establishment of a Program Integration and IT Infrastructure Sub-Group under the Interagency Exchange Work Group with broad state agency participation and coordination from the Minnesota Departments of Commerce, Human Services (Minnesota's Medicaid Agency,) and Health. These coordinated efforts have worked on creating a positive user experience by focusing on the technical and operational aspects of an Exchange related to:

- Integration of programs and information for private and public coverage;
- Creating mechanisms to incent value and competition by health insurers and health care providers;
- Simplifying regulation; and
- Streamlining eligibility and enrollment for public health care programs, including where possible, social services.

Minnesota's efforts have focused on creating a high quality experience with seamless coordination between the Exchange, Medicaid, CHIP, and other State health care programs as well as between the Exchange and insurers, employers, and Navigators/brokers. Minnesota's goal is to ensure an equally high-quality experience for all individuals seeking coverage, regardless of the private or public source of coverage or amount of financial assistance for which they may qualify.

In June 2011, Minnesota published a Request for Proposals (RFP) for a two-staged, proof of concept approach to evaluate IT infrastructure options and costs for an Exchange with Planning Grant funds. During stage one, RFP respondents proposed prototypes for a fully functioning Exchange technical infrastructure and/or specific component modules. This month, successful respondents were awarded contracts with stipends under Planning Grant funds to create proposals including prototypes, detailed cost estimates, work plans, and timeline proposals for potential implementation in stage two. The proposals and prototypes for stage two are due in December 2011. The prototypes will be available for public viewing in December 2011.

Stage two includes an evaluation of the proposals and prototypes, funded under stage one for possible Exchange implementation. Only respondents that received a stipend in stage one are eligible to participate in stage two. Actual Exchange implementation may include work done by other States including Early Innovator States, utilization of systems used by Minnesota State agencies, or work based upon a submitted prototype. Future contract awards for respondents evaluated under stage two for possible inclusion in Exchange implementation are contingent on receipt of future Federal Establishment Grant funding.

Minnesota has requested proposals for the development of the following Exchange modules:
1. Individual eligibility and exemption
2. Individual enrollment
3. Small employer eligibility and enrollment
4. Health benefit plan and Navigator/broker certification and display
5. Provider display
6. Fund aggregation and payment
7. Account administration
8. Mobile application or accessibility

The RFP is seeking innovative, flexible, and interoperable solutions for design and development of Exchange IT components. Solutions must be flexible to adapt to changing policies and business rules, interoperable within the Exchange and with external systems, and foster the continuous inclusion of new technology that enhances performance and the consumer experience. All proposals are required to comply with HIPAA transaction standards (including those adopted by the Secretary pursuant to sections 1104 and 1561 of the Affordable Care Act), as well as State and Federal security and privacy standards consistent with Federal law.

Minnesota also received funds in the Level-One grant to contract for technical assistance for IT architecture integration and interaction that builds on the RFP modules. This RFP is anticipated to be released over the next two months.

In the area of IT Infrastructure, Minnesota representatives from the Departments of Commerce, Human Services, and Health have also elected to participate in the UX 2014 project, sponsored by the California HealthCare Foundation and several other national and state health care philanthropies. The project focuses on researching components of a "best-in-class" user experience for an Exchange. As the project develops, Minnesota will share stakeholders' feedback with this effort to ensure that Minnesota both contributes to and learns from the UX2014 project.

❖ **Business Operations and Resources and Capabilities** – *May include an assessment of current and future staff levels, contracting capabilities and needs, and information technology. May include plans for eligibility determinations, plan qualification, plan bidding, application of quality rating systems and rate justification, administration of premium credits and cost-sharing assistance, and risk adjustment.*

Minnesota's planning activities regarding Business Operations and Resources and Capabilities have included the establishment of a Sub-Group under the Interagency Exchange Work Group with representatives from the Minnesota Departments of Commerce, Human Services, and Health. The goal of this Sub-Group was to create an initial assessment of existing functions related to the operations of an Exchange and to develop preliminary cost estimates for various Exchange business operations.

Minnesota recently received Level-One grant funds to hire full-time Exchange staff devoted to building on the work of the Sub-Group under the Planning Grant to design and develop detailed work plans, timelines, and budget estimates through 2014 related to Business Operations and Exchange Functions. These staff, with the assistance of stakeholder work groups soon to be established, will assess options for business operations and Exchange functions including: services, processes and timing for call resolution, and training requirements for call center staff; consumer assistance; quality rating systems; outreach and education, risk adjustment – including methods, data sources, and the costs of obtaining, maintaining, and using data sources for existing risk adjustment mechanisms; Navigators/brokers – including training/education requirements and compensation; premium collection and aggregation; notices; regulation of health insurers and health benefit plan certification; providing information about consumer protections; and collecting data on inquiries and complaints and how issues are resolved.

Funding was also granted as part of Minnesota's Level-One request to conduct marketing research to assist in the development of options and cost estimates for public education, outreach, and marketing efforts for an Exchange. The goal of this research is to better understand the communications, public awareness, engagement strategies, and timing that will be most effective in educating Minnesotans about an Exchange. Minnesota will solicit bids for marketing research via an RFP process over the next two months.

❖ **Governance** – *May include planning for a State-run Exchange or an Exchange run by an independent entity. If an Exchange is expected to be State-run, planning could include determinations of where the Exchange would reside, what the governing structure would be, and to what departments or*

officials it would be accountable. If an Exchange is expected to be established through an independent entity, planning could include the development of the governance structure, appointment process, conflict of interest rules, and mechanisms of accountability. If the State is planning to coordinate with other States for a regional Exchange, activities relating to coordination with other States to establish an Exchange, determine markets, and ensure licensure and consumer protections could be developed.

Minnesota recently received Level-One establishment funding for the establishment of an initial Exchange governance structure and full-time Exchange staff within the Department of Commerce to incubate the design and development of a Minnesota Exchange. A request for use of Exchange Establishment Grant funds was included and authorized as part of Governor Dayton's biennial budget request to the 2011 Minnesota Legislature under Minnesota Statutes §3.3005. Level-One funding was also granted for the Commissioner of Commerce to establish an Advisory Task Force, under authority granted in Minnesota Statutes §15.014, to provide guidance on the design and development of an Exchange for Minnesota, including long-term governance. Advisory Task Force members were selected this month and will serve for two years.

❖ **Finance** *– May include pathways to developing accounting and auditing standards, mechanisms of transparency to the public, and procedures to facilitate reporting to the Secretary.*

A Finance Director was hired and began work in mid-September. The Finance Director is responsible for creating detailed work plans and budget estimates through 2014 related to financial management, program integrity activities to prevent fraud, waste, and abuse, and upfront and ongoing Exchange financing mechanisms, including cost allocation between Medicaid and Exchange funding streams.

❖ **Regulatory or Policy Actions** *– May include a determination of the scope and detail of enabling legislation and implementing State regulations.*

To date, State agency staff from the Departments of Commerce, Human Services, and Health analyzed and monitored two Exchange establishment bills (HF1204/SF917 and HF497) that were introduced in the Minnesota State Legislature in the 2011 Legislative Session. There were two informational committee hearings, one in the House of Representatives and one in the Senate, that addressed general Exchange related issues; however, neither of the bills that were introduced had a formal hearing. Multiple Exchange amendments were offered in committee hearings and on the House floor, but none were adopted.

Barriers, Lessons Learned, and Recommendations to the Program

Please report on any issues or problems that have impacted the development and implementation of the project during the reporting period. Detail what impact any issues may have on the achievement of project targets, and set out how you plan to tackle these issues.

Minnesota experienced a State government shutdown in July 2011. As a result, some of Minnesota's planning activities have been delayed.

Also provide any lessons that you have learned during this quarter that you think would be helpful to share with other states as well as any recommendations you have for the program.

Minnesota continues to be open to sharing lessons with other states.

Technical Assistance

Please describe in detail any technical assistance needs you have identified through your planning activities. Please be as specific as possible about the kind of assistance needed and the topic areas you need to address. Discuss any plans you have for securing such assistance.

Minnesota has no technical assistance requests at this time.

Draft Exchange Budget

In order to understand state budgetary requirements moving forward, we ask that you provide a draft budget to the extent possible for Federal fiscal years 2011 through 2014. You may specify functional areas as you deem appropriate based on the types of costs you anticipate incurring. Examples of possible functional areas include personnel, other overhead, IT and systems costs, and other operational costs. When developing IT and systems cost estimates, please ensure that you separate costs for updating Medicaid systems from costs for Exchange systems.

Draft budget information through 2014 is not yet available. Budget estimates will be available in the next quarter as stage two of the IT RFP is completed in December and as new staff including the Finance Director develop detailed work plans and budget estimates.

Work Plan

We ask that you begin working on a draft work plan for your Exchanges that will carry your planning and implementation efforts through January 1, 2014. On a quarterly basis, we would like to see your progress in developing this plan. We would like you to provide key objectives for implementing your exchange and corresponding milestones under each of these objectives. For your first quarterly report, please provide two milestones under each core area. In your second report, please provide four milestones. For your third report and the final report, we expect your work plan to be as comprehensive as possible.

Background Research

Activity	Timing	Status	Responsibility
Household survey with detailed information on sources of coverage and characteristics of the uninsured	Prior to February 2011	Prior to Planning Grant - Complete	Minnesota Department of Health (MDH)
Research on the size of the individual and small group markets	Prior to February 2011	Prior to Planning Grant - Complete	MDH
Research on the number of insurers in the individual and small group markets and their market share	Prior to February 2011	Prior to Planning Grant - Complete	MDH
Background Research Sub-Group created under Interagency Exchange Work Group	February 2011	Planning Grant - Complete	Exchange Director, MDH Research Supervisor
Contract finalized with Jonathan Gruber and Gorman Actuarial for economic and actuarial modeling	March 2011	Planning Grant - Complete	Exchange Director, MDH Research Supervisor, Contractors
Preliminary Exchange enrollment numbers and research findings from economic and actuarial modeling contractors available for review and testing of alternative assumptions	October 2011	Planning Grant - Complete	Exchange Director, MDH Research Supervisor, Interagency Staff, Contractors
Review preliminary Exchange economic and actuarial modeling results with health insurers and high risk pool	October 2011	Planning Grant - Complete	Exchange Director, MDH Research Supervisor, Interagency Staff, Contractors
Final Exchange enrollment numbers and research findings from economic and actuarial modeling contractors	November 2011	Planning Grant	Exchange Director, MDH Research Supervisor, Contractors
Present Exchange enrollment numbers and research findings to Advisory Task Force and stakeholders	November 2011	Planning Grant	Exchange Director, MDH Research Supervisor, Contractors
Final report with Exchange enrollment numbers and research findings from economic and actuarial modeling contractors	December 2011	Planning Grant	Exchange Director, MDH Research Supervisor, Contractors

Stakeholder Consultation

Activity	Timing	Status	Responsibility
55 meetings with over 90 stakeholder groups including representatives from the employer, consumer, health insurer, health care provider, Tribal, county, and Navigator/broker communities	March – August 2011	Planning Grant - Complete	Exchange Director, DHS Assistant Commissioner for Health Reform, MDOC Health Policy Director, Interagency Staff
Facilitated focus group sessions with employers, consumers, health insurers, providers, and potential Navigators/brokers, including Tribes, related to Program Integration and IT Infrastructure	May 2011	Planning Grant - Complete	Exchange Director, IT Project Manager, Project Manager, DHS Assistant Commissioner for Health Reform, MDOC Health Policy Director, Contracted Facilitators
Establish Advisory Task Force under Minnesota Statutes §15.014	October 2011	Level-One Grant – Complete	MDOC Commissioner, Exchange Director
Engage stakeholders, including monthly meetings and conference calls and process for consultation with Federally recognized Tribal governments	August 2011 - August 2012	Level-One Grant – In progress	Exchange Director, Communications and Marketing Director
Public evaluation of prototypes from stage two of RFP process	December 2011	Planning Grant	Exchange Director, IT Policy Director, Exchange IT Project Manager

Program Integration and IT Infrastructure

Activity	Timing	Status	Responsibility
Exchange Work Group created with interagency agreements for participation from the Departments of Commerce (MDOC), Human Services (DHS), and Health (MDH)	February – August 2011	Planning Grant - Complete	Exchange Director
Program Integration and IT Infrastructure Sub-Group created under Interagency Exchange Work Group	February – August 2011	Planning Grant - Complete	Exchange Director, IT Project Manager
Interagency work with facilitator to develop object framing, concept, and process models that specify the business and technical requirements for an Exchange to facilitate an innovative, modular, flexible, and interoperable framework	April – May 2011	Planning Grant - Complete	Exchange Director, IT Project Manager, Sub-Group, Contract Facilitators

Activity	Timing	Status	Responsibility
Facilitated focus group sessions with employers, consumers, health insurers, providers, and potential Navigators/brokers including Tribes, related to Program Integration and IT Infrastructure	May 2011	Planning Grant - Complete	Exchange Director, IT Project Manager, DHS Assistant Commissioner for Health Reform, MDOC Health Policy Director, Contract Facilitators
Program Integration and IT Infrastructure Sub-Group finalize Exchange IT Gap Analysis	June 2011	Planning Grant - Complete	IT Project Manager, DHS Information Systems Director, MDOC Information Management Services Director
Release Exchange IT "Proof of Concept" RFP that specifies broad Exchange goals, objectives, requirements, and program integration alignment	June 2011	Planning Grant – Complete	Exchange Director, IT Project Manager, Sub-Group , Interagency Staff
RFP stage one proposals due	August 2011	Planning Grant - Complete	Exchange Director, IT Project Manager
RFP stage one evaluation of all modules and vendor selection	September 2011	Planning Grant - Complete	Exchange Director, IT Project Manager, Interagency Staff
Hire IT Project Director and IT Policy Director	September – November 2011	Level-One Grant – In progress	MDOC Commissioner, Exchange Director
RFP stage one contracts executed for vendors selected to develop prototypes and detailed work plans and cost estimates	October 2011	Planning Grant - Complete	Exchange Director, IT Project Director
Receive completed prototypes and detailed work plan and cost estimates from RFP respondents for IT modules	December 2011	Planning Grant	Exchange Director, IT Project Director, IT Policy Director, Interagency Staff
RFP stage two evaluation of prototypes, proposals, work plans, and detailed cost estimates and execution of contracts for selected contractors	December 2011 – February 2012	Level-One and Future Grant	Exchange Director, IT Policy Director, IT Project Director, Senior Counsel, Exchange Staff, Interagency Staff
Release Exchange component integration and systems interaction RFP	December 2011	Level-One Grant	IT Policy Director, IT Project Director, Exchange Staff, Interagency Staff
Evaluate responses and select vendors for component integration and systems interaction RFP	January 2012	Level-One Grant	IT Policy Director, IT Project Director, Exchange Staff, Interagency Staff

Activity	Timing	Status	Responsibility
Execute contract for Exchange component integration and systems interaction RFP	February 2012	Level-One Grant	Exchange Director, IT Policy Director, IT Project Director, Senior Counsel, Exchange Staff, Interagency Staff
Produce detailed IT infrastructure and Program Integration work plans for component integration and systems interaction to include: SDLC implementation plan; security risk assessment (IV&V) and release plan; final business requirements, design and systems requirements, and requirements documentation	March 2012	Level-One Grant	IT Policy Director, IT Project Director, Exchange Staff, Interagency Staff, IT Integration and Interaction Contractor
Complete preliminary development for component integration and systems interaction for IT infrastructure	July 2012	Level-One Grant	IT Policy Director, IT Project Director, Exchange Staff, Interagency Staff, IT Integration and Interaction Contractor
Complete development for modules, component integration, and systems interaction for IT infrastructure	December 2012	Future Grant	IT Policy Director, IT Project Director, Exchange Staff, Interagency Staff, IT Contractors
System and user testing	January – September 2013	Future Grant	IT Policy Director, IT Project Director, Exchange Staff, Interagency Staff, IT Contractors

Program Integration, Business Operations, and Providing Assistance to Individuals and Small Businesses, Coverage Appeals and Complaints

Activity	Timing	Status	Responsibility
Business Operations Sub-Group created under Interagency Exchange Work Group	February 2011	Planning Grant - Complete	Project Manager, DHS Health Care Eligibility and Access Director, and MDOC Health Policy Director
Sub-Group initial assessment of existing processes at the Minnesota Departments of Commerce, Human Services, and Health.	March - August 2011	Planning Grant - Complete	Project Manager, DHS Health Care Eligibility and Access Director, and MDOC Health Policy Director

Activity	Timing	Status	Responsibility
Hire full-time operations staff, including Operations Director, Commercial Operations Director, Public Programs Operations Director, Measurement and Reporting Director, and Communications and Marketing Director	September – November 2011	Level-One Grant – In progress	MDOC Commissioner, Exchange Director
Develop detailed work plans and budget estimates for business operations	September – December 2011	Level-One Grant – In progress	Operations Director, Commercial Operations Director, Public Programs Operations Director, Measurement and Reporting Director, and Communications and Marketing Director, Project Manager
Release RFP for Minnesota-specific marketing research	January 2012	Level-One Grant	Communications and Marketing Director
Evaluate responses and execute contract for marketing research from RFP	February 2012	Level-One Grant	Exchange Director, Communications and Marketing Director, Senior Counsel, Exchange Staff, Interagency Staff
Complete marketing research	April 2012	Level-One Grant	Communications and Marketing Director, Exchange Staff, Interagency Staff, Contractor
Execution of detailed work plans for business operations	January – August 2012	Level-One Grant	Operations Director, Commercial Operations Director, Public Programs Operations Director, Measurement and Reporting Director, and Communications and Marketing Director, Project Manager
RFPs and contracts for vendor assistance with implementation of business operations	February – December 2012	Future Grant	Exchange Director, Operations Director, Senior Counsel, Exchange Staff, Interagency Staff

Governance

Activity	Timing	Status	Responsibility
Establish initial governance structure for incubating design and development of a Minnesota Exchange	August 2011	Level-One Grant – Complete	MDOC Commissioner, Exchange Director
Hire full-time Exchange staff for design and development of a Minnesota Exchange	September – November 2011	Level-One Grant – In progress	MDOC Commissioner, Exchange Director
Establish and select members for Advisory Task Force under Minnesota Statutes §15.014 to provide guidance and recommendations on design and development of a Minnesota Exchange	October 2011	Level-One Grant – Complete	MDOC Commissioner, Exchange Director
Advisory Task Force first meeting	November 2011	Level-One Grant	MDOC Commissioner, Exchange Director
Regular Advisory Task Force Meetings	November 2011 - August 2012 +	Level-One Grant	MDOC Commissioner, Exchange Director, Exchange Staff, Interagency Staff

Financial Management and Program Integrity

Activity	Timing	Status	Responsibility
Utilize existing state processes and procedures to ensure adequate financial management of Exchange planning and establishment funds	February 2011 – ongoing	Planning Grant and Level-One Grant	MDOC Commissioner, Exchange Director, Finance Director
Financing Options Sub-Group created under Interagency Exchange Work Group	February 2011	Planning Grant - Complete	Exchange Director, Executive Budget Officer
Hire Finance Director	September 2011	Level-One Grant - Complete	MDOC Commissioner, Exchange Director
Develop detailed financial management and program integrity work plans	September – December 2011	Level-One Grant	Finance Director, Project Manager
Provide strategic direction for financial operations and financing mechanisms – including cost allocation between Medicaid and the Exchange, and ensure financial monitoring and reporting compliance	August 2011- August 2012	Level-One Grant – In progress	Finance Director, Project Manager, Interagency Staff
RFPs and contracts for vendor assistance with implementation of financial operations	February – December 2012	Future Grant	Exchange Director, Finance Director , Senior Counsel, Exchange Staff, interagency Staff

State Legislative/Regulatory Actions and Health Insurance Market Reforms

Activity	Timing	Status	Responsibility
Monitor and review Exchange and health insurance market reform legislation and amendments during Regular Legislative Session	January – May 2011	Planning Grant - Complete	MDOC, DHS, and MDH Legislative Staff, Exchange Director, DHS Assistant Commissioner for Health Reform
Receive authority to accept Federal Exchange Establishment funds	May 2011	Planning Grant - Complete	MDOC Commissioner, Exchange Director
Engage Task Force on possible legislative/regulatory actions	November 2011 – August 2012	Level-One Grant	MDOC Commissioner, Exchange Director

Collaborations/Partnerships

Report on who you are working with outside of your office or department, and any changes or issues in your institutional context and/or any progress or issues with your project partners (where applicable).

The activities included in this Planning Grant are being carried out as a collaborative effort from a number of State agencies including the Departments of Commerce, Health, Human Services and Management and Budget. A number of stakeholder groups including employers, consumers, health insurers, health care providers, brokers/navigators and representatives of tribal governments in the State have been, and will continue to be, consulted regarding specific components of the Planning Grant.