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June 22, 2026

Jill DeCarteret
Arc of the South Shore- First EIP
574 Main St.
S. Weymouth, MA 02190

Dear Jill,

The purpose of this monitoring report is to provide a summary of the results of the Cyclical Monitoring activities conducted by the Department of Public Health's (the Department's) Early Intervention (EI) Division. As part of its general supervision process, early intervention service programs and specialty service programs are monitored on their policies and procedures and implementation of those policies and procedures to meet the requirements of the Individuals with Disabilities Education Act (IDEA or the Act).

Those requirements include:

- 1) Improving educational results and functional outcomes for all infants, toddlers, children, and youth with disabilities; and
- 2) Ensuring that public agencies meet the program requirements under Part C of IDEA, with a particular emphasis on those requirements that are most closely related to improving educational results for infants and toddlers with disabilities.

During the cyclical monitoring process the EI Division examined the program's policies and procedures regarding the following monitoring priorities and components of IDEA part C:

- Compliance (45 Day IFSP timeline, timely services, service delivery, and supervision)
- Results (services provided in the natural environment, child find, evaluations, assessments, and outcomes)
- Dispute Resolution and family rights
- Data Quality (timely and accurate data entry)
- Fiscal (claims and responsibility)

This cyclical monitoring report summarizes the Early Intervention Division's review of IDEA Part C requirements and Massachusetts Early Intervention Operational Standards regarding these monitoring priorities and components. The EI Division conducted Cyclical Monitoring activities through interviews with representatives from Arc of the South Shore- First EIP and families that participated in Part C

services at First EIP. In addition to interviews, the EI Division reviewed records (individualized family service plans, service progress notes, claims) of a sample of children with data submitted into the Early Intervention Client System, policies and procedures, and other related documents submitted to the Early Intervention Division.

Based on its review of available documents, information, and interviews conducted, the EI Division has identified 8 findings of noncompliance with IDEA and state requirements described in further detail in the monitoring report, including any required actions.

The EI Division has not identified any noncompliance in the following components: Data. Therefore, these items are not included in the narrative below.

Summary of Monitoring Priorities and Outcomes

MONITORING COMPONENT	FINDINGS SUMMARY
Compliance	1.1 The EI Division finds that the EIS program has not established reasonably designed IFSP policies related to multidisciplinary IFSPs, as required under 34 CFR §303.24 and prior written notice for IFSPs as required by 34 CFR §303.421. The EI Division finds that the program does not complete the requirement to provide IFSPs in the family's native language under (34 CFR 303.342 (d) (1). 1.2 The EI Division finds that the EIS program does not complete the service delivery requirement under EIOS Page 32 and (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)).
Results	2.1 The EI Division finds that the program does not complete the natural environment requirement under 34 CFR § 303.344 (d) 2.2 The EI Division finds that the program does not complete the Native Language requirement under 34 CFR § 303.421.
Dispute Resolution	3.1 The EI Division finds that the EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to prior written notice requirements under 34 CFR §303.421.
Fiscal	4.1 The EI Division finds that the program does not complete the claims service log validation requirements under Massachusetts Department of

	Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services, version 11 p.10. 4.2 The EI Division finds that the program has not established reasonably designed insurance member eligibility policies as required in accordance with Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services v. 11 Page 4. 4.3 The EI Division finds that the program has not established reasonably designed parental consent disclosure policies as required under 34 CFR 303.520 and 34 CFR 303.7.
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The EI Division appreciates First EIP's continued efforts to improve the implementation of IDEA Part C and the development and implementation of a reasonably designed EIS program which ensures compliance and improving results for infants and toddlers with disabilities and their families. The EI Division notes that having a consistent and transparent system for identifying and correcting noncompliance, particularly noncompliance that impacts the delivery of early intervention services, in accordance with individualized family service plans (IFSPs), and dispute resolution systems that protect the rights of parents, are essential elements to ensuring improved results for infants and toddlers with disabilities and their families. If you have any questions, please contact your Clinical Oversight and Support Specialist.

Sincerely,

Julie Longpre
Clinical Oversight and Support Specialist, Early Intervention Division

cc: Molly Gilbride, Clinical Quality Manager, Early Intervention Division
Michelle Conlon, Clinical Quality Assurance Coordinator, Early Intervention Division

COMPLIANCE

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
1.1 IFSP- Multidisciplinary, Prior Written Notice, and Native Language Under, Federal Regulation 34 CFR §303.24 The IFSP Team in § 303.340 must include the involvement of the parent and two or more individuals from separate disciplines or professions and one of these individuals must be the service coordinator Under Federal Regulation 34 CFR §303.421 Prior written notice and procedural safeguards notice. a) <i>General</i>. Prior written notice must be provided to parents a reasonable time before the lead agency or an EIS provider proposes, or refuses, to initiate or change the identification, evaluation, or placement of their infant or toddler, or the provision of early intervention services to the infant or toddler with a disability and that infant's or toddler's family.	1.1 During policy review, the EI Division specifically identified that the program's policy did not include the requirements that all IFSPs are multidisciplinary and that prior written notice is required for IFSP meetings. During record reviews, the EI Division found that the program did not consistently meet the requirement to provide IFSPs in the native language. The EI Division reviewed a total of 11 child records for satisfactory demonstration of 100%. A total of 1/11 of these records demonstrated that the program did not complete the requirement.	The EI Division's analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 1.1 The EI Division finds that the EIS program has not established reasonably designed IFSP policies related to multidisciplinary IFSPs, as required under 34 CFR §303.24 and prior written notice for IFSPs as required by 34 CFR §303.421. The EI Division finds that the program does not complete the requirement to provide IFSPs in the family's native language under (34 CFR 303.342 (d) (1).	Policies and procedures— within 90 days of the date of this monitoring report the program must submit to the EI Division: 1. Policies and procedures documenting the program's process for multidisciplinary IFSPs and prior written notices for IFSPs. The policies and procedures must ensure that the program's process is reasonably designed under 34 CFR §303.24 for multidisciplinary IFSPs and under 34 CFR §303.421 for prior written notice. Evidence of implementation— as soon as possible, but no later than one year from the date of this monitoring report, the program must demonstrate to the EI Division: 2. Demonstration of 100% IFSPs in the native language as evidenced by the EI Division's review of subsequent records.

Under, Federal Regulation (34 CFR 303.342 (d) (1). (d) Accessibility and convenience of meetings. (1) IFSP meetings must be conducted— (i) In settings and at times that are convenient for the family; and (ii) In the native language of the family or other mode of communication used by the family, unless it is clearly not feasible to do so.			
1.2 Service Delivery (Consent and Accuracy) Under, Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)); 34 C.F.R. § 303.342(e), Service Provision: As a condition of receiving assistance under Part C of IDEA, each State must ensure that appropriate early intervention services are available to all infants and toddlers with disabilities and their families as required by 34 C.F.R. § 303.112. Under 34 C.F.R. § 303.342(e), each State must ensure that Part C services are provided to all eligible infants and toddlers with disabilities and their families in a timely manner and that each	1.2 During record reviews, the EI Division found that the program did not consistently meet the requirement of ongoing service delivery consistency as consented to by the parents on the IFSP. The EI Division reviewed a total of 11 child records for satisfactory demonstration of 100%. A total of 3/11 of these records demonstrated that the program did not complete the requirement.	The EI Division’s analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 1.2 The EI Division finds that the EIS program does not complete the service delivery requirement under EIOS Page 32 and (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)).	Evidence of implementation— as soon as possible, but no later than one year from the date of this monitoring report, the program must demonstrate to the EI Division: 1. Demonstration of 100% service delivery, as evidenced by the EI Division’s review of subsequent records.

eligible infant and toddler with a disability has available early intervention services that are designed to meet his or her unique individual needs as identified by the IFSP team as required by 34 C.F.R. §§ 303.13(c), 303.342, and 303.344(d). In accordance with Early Intervention Operational Standards, page 32: C. SERVICE COORDINATION Conducting activities which ensure the timely and consistent delivery of IFSP (Part C) services;			
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RESULTS

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
2.1 Natural Environment Under Federal Regulation 34 CFR § 303.344 (d) (1) The IFSP must include a statement of the specific early intervention services, based on peer-reviewed research (to the extent practicable), that are necessary to meet the unique needs of the child and the family to achieve the results or outcomes identified in paragraph (c) of this section, including—	2.1 During record reviews, the EI Division found that the program did not consistently meet the requirement for natural environments. The EI Division reviewed a total of 11 child records for satisfactory demonstration (100%) of services within the natural environment or with appropriate justifications. A total of 3/11 of these records	The EI Division's analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 2.1 The EI Division finds that the program does not complete the	Evidence of implementation— as soon as possible, but no later than one year from the date of this monitoring report, the program must demonstrate to the EI Division: 1. Demonstration of 100% compliance with natural environments or appropriate justification, as evidenced by the EI

(i) The length, duration, frequency, intensity, and method of delivering the early intervention services. (ii) A statement that each early intervention service is provided in the natural environment for that child or service to the maximum extent appropriate, consistent with §§ 303.13(a)(8), 303.26 and 303.126, or, subject to paragraph (d)(1)(ii)(B) of this section, a justification as to why an early intervention service will not be provided in the natural environment.	demonstrated that the program did not complete the requirement and were missing justifications.	natural environment requirement under 34 CFR § 303.344 (d).	Division's review of subsequent records.
2.2 Native Language Under, Federal Regulation 34 CFR § 303.421: Prior written notice and procedural safeguards notice The notice must be— Written in language understandable to the general public; and provided in language the parent understands, as defined in §303.25, of the parent or other mode of communication used by the parent, to empower parents as decision makers, unless it is clearly not feasible to do so.	2.2 During record reviews, the EI Division found that the program did not consistently meet the requirement of providing prior written notice in a family's native language. The EI Division reviewed a total of 11 child records for satisfactory demonstration (100%) of the requirements. A total of 8/11 of these records demonstrated that the program did not complete the requirement.	The EI Division's analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 2.2 The EI Division finds that the program does not complete the Native Language requirement under 34 CFR § 303.421.	Evidence of implementation— as soon as possible, but no later than one year from the date of this monitoring report, the program must demonstrate to the EI Division: 1. Demonstration of 100% prior written notices in the native language, as evidenced by the EI Division's review of subsequent records.

DISPUTE RESOLUTION

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
3.1 Prior Written Notice for Transition Conference Under Federal Regulation 34 CFR §303.421 Prior written notice and procedural safeguards notice. a) <i>General</i>. Prior written notice must be provided to parents a reasonable time before the lead agency or an EIS provider proposes, or refuses, to initiate or change the identification, evaluation, or placement of their infant or toddler, or the provision of early intervention services to the infant or toddler with a disability and that infant's or toddler's family.	3.1 During record reviews, the EI Division found that the program did not consistently meet the requirement for providing prior written notice for transition conferences. The EI Division reviewed a total of 11 child records for satisfactory demonstration (100%) of requirements. A total of 8/11 of these records demonstrated that the program did not complete the requirement. During policy review, the EI Division specifically identified that the program's policy did not include all the activities that require prior written notice.	The EI Division's analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 3.1 The EI Division finds that the EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to prior written notice requirements under 34 CFR §303.421.	Policies and procedures— within 90 days of the date of this monitoring report the program must submit to the EI Division: 1. Policies and procedures documenting the program's process for prior written notice. The policies and procedures must ensure that the program's process is reasonably designed as required by 34 CFR §303.421. Evidence of implementation— as soon as possible, but no later than one year from the date of this monitoring report, the program must demonstrate to the EI Division: 1. Demonstration of 100% prior written notices for transition conferences, as evidenced by the EI Division's review of subsequent records.

FISCAL

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
4.1 Claims Charge claims and encounter claims are required to match the service log data on the Progress Note in the DPH EI Client System. (Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services, version 11 p.10)	4.1 During record reviews, the EI Division found that the program did not consistently meet the claims service log validation requirements. The EI division reviewed a total of 11 child records for satisfactory demonstration (100%) of claims service log validation requirements. A total of 6 of these records demonstrated that the program did not complete the claims service log validation requirement.	The EI Divisions' analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 4.1 The EI Division finds that the program has not established reasonably designed claim service log validation requirement procedures as required in accordance with Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services, version 11 Page 10.	Evidence of implementation— as soon as possible, but no later than one year from the date of this monitoring report, the program must demonstrate to the EI Division: 1. Demonstration of 100% claims service log validations, as evidenced by the EI Division's review of subsequent records.
4.2 Insurance Verification Contracted programs are required to verify insurance member eligibility for MassHealth, MassHealth MCO's and ACO's, and commercial insurance, on a regular basis, to ensure that claims	4.2 During policy review, the EI Division specifically identified that the program's policy did not include specific procedures for verifying insurance member eligibility for payors.	The EI Divisions' analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program	Policies and procedures— within 90 days of the date of this monitoring report the program must submit to the EI Division: 1. Policies and procedures documenting the

are submitted to the appropriate payor. (Early Intervention Division Reimbursement Policy Manual version 11, Page 4)		staff and families/caregivers. Based on this analysis: 4.2 The EI Division finds that the program has not established reasonably designed insurance member eligibility policies as required in accordance with Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services v. 11 Page 4.	program's process for verifying the insurance member eligibility for MassHealth, MassHealth MCO's and ACO's, and commercial insurance on a regular basis. The policies and procedures must ensure that the program's process is reasonably designed in accordance with the Early Intervention Division Reimbursement Policy Manual (version 11, Page 4).
4.3 Parental Refusal to Access Insurance Prior to obtaining parental consent, contracted programs are required to inform parents, in writing and in the native language of the parents, of their rights regarding consent to bill insurance, that services to their family will not be negatively impacted should consent not be given, and that consent can be revoked at any time, although revocation is not retroactive. (34 CFR 303.7 & 34 CFR 303.520)	4.3 During policy review, the EI Division specifically identified that the program's policy did not include specific procedures for providing documentation in the native language of the parents detailing their rights relating to consent before obtaining said consent.	The EI Divisions' analysis is based on documents and information provided by the program, records located within the EICS, as well as interviews with program staff and families/caregivers. Based on this analysis: 4.3 The EI Division finds that the program has not established reasonably designed parental consent disclosure policies as required under 34 CFR 303.520 and 34 CFR 303.7.	Policies and procedures—within 90 days of the date of this monitoring report the program must submit to the EI Division: 1. Policies and procedures documenting the program's process for providing written notice to the parents, (in their native language). The policies and procedures must ensure that the program's process is reasonably designed as required by 34 CFR 303.7 and 34 CFR 303.520.