



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
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Commissioner

**12/10/2025**

Amanda Kasica  
Bay Cove Early Intervention  
105 Victory Rd  
Dorchester, MA 02122  
akasica@baycove.org

Dear Amanda,

The purpose of this letter is to provide an update on the status of the findings and corrective actions identified by the Department of Public Health's (the Department) Early Intervention Division (EI Division) reported in the Cyclical Monitoring report to Bay Cove Early Intervention Program dated June 23, 2025. Based upon the EI Division's analysis of the revised policies and procedures and/or evidence submitted by Bay Cove Early Intervention, as well as subsequent data pulled from the Early Intervention Client System on 10/28/25 for all relevant requirements, the EI Division has determined that the Bay Cove Early Intervention Program has taken the necessary steps to address and resolve the findings of noncompliance and the required corrective actions outlined in the monitoring report.

The chart, included in this letter, summarizes the monitoring component, findings, required actions, EI Division analysis, and status of finding(s) based on the evidence received from Bay Cove Early Intervention.

The EI Division appreciates Bay Cove Early Intervention's continued efforts to improve the implementation of IDEA Part C and the development and implementation of a reasonably designed system which ensures compliance and improving results for infants and toddlers with disabilities. 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, and dispute resolutions systems that protect the rights of parents, are essential elements to ensuring

improved results for infants and toddlers with disabilities. If you have any questions, please reach out to your clinical oversight and support specialist, at [Kasey.M.Jaynes@mass.gov](mailto:Kasey.M.Jaynes@mass.gov).

Sincerely,

Susan Grossman  
Interim Clinical Oversight and Support Specialist

Molly Gilbride  
Clinical Quality Manager, Early Intervention Division

**Results**

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
<p><b>1.1 Determining Eligibility/ Evaluation and Assessment</b></p> <p>Under Federal Regulation 34 CFR §303.321 Evaluation of the child and assessment of the child and family.</p> <p>(4) All evaluations and assessments of the child and family must be conducted by qualified personnel, in a nondiscriminatory manner, and selected and administered so as not to be racially or culturally discriminatory.</p> <p>(5) Unless clearly not feasible to do so, all evaluations and assessments of a child must be conducted in the native language of the child, in accordance with the definition of native language in §303.25.</p> <p>(6) Unless clearly not feasible to do so, family assessments must be conducted in the native language of the family members being assessed, in accordance with the definition of native language in §303.25.</p> <p>In accordance with Early Intervention Operational Standards VI.ENTRY INTO PROGRAM, B, Pg. 23</p>	<p>1.1</p> <p>During policy review, the EI Division specifically identified that the program’s policy did not include language to ensure that when determining eligibility/ evaluation and assessments, all evaluations are culturally and linguistically appropriate.</p>	<p>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, the EI Division finds that:</p> <p>1.1 The program has not established reasonably designed policies to ensure Determining Eligibility/Evaluation and Assessment are culturally and linguistically appropriate for the infant/toddler and family as required under, Federal Regulation 34 CFR § 303.321 and in accordance with Early Intervention Operational Standards VI.ENTRY INTO PROGRAM, B, Pg. 23.</p>	<p>CORRECTED AND CLOSED</p>

<p>6.The eligibility evaluation process is culturally and linguistically appropriate for the infant/toddler and family. Unless clearly not feasible to do so, child evaluations and assessments must be conducted in the native language of the infant/toddler. The disciplines represented on the multidisciplinary evaluation team are determined, to the extent possible, by the developmental areas of concern for the infant/ toddler.</p>			
<p><b>Legal Requirement/State Standard</b></p>	<p>Noncompliant Policy, Procedure or Practice and EI Division analysis</p>	<p>Conclusion/Finding</p>	<p>Next Steps and Required Actions</p>
<p><b>1.2 Child Find and Referral</b>  Under 34 CFR 303.302 Scope of child find. The lead agency, as part of the child find system, must ensure that—  (1) All infants and toddlers with disabilities in the State who are eligible for early intervention services under this part are identified, located, and evaluated, including—  (i) Indian infants and toddlers with disabilities residing on a reservation geographically located in the State (including coordination, as necessary, with tribes, tribal organizations, and consortia to identify infants and toddlers with</p>	<p>1.2  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with referral timelines.  During interviews, families reported being told there were waitlists for the program and reported not hearing from the program for several months after first referral.</p>	<p>1.2  The program’s implementation of its policies and procedures does not ensure compliance with referral timeline requirements including staff training and parent involvement in accordance with Early Intervention Operational Standards VI(a)(1) pg. 22.</p>	<p>CORRECTED AND CLOSED</p>

<p>disabilities in the State based, in part, on the information provided by them to the lead agency under §303.731(e)(1)); and</p> <p>(ii) Infants and toddlers with disabilities who are homeless, in foster care, and wards of the State; and</p> <p>(iii) Infants and toddlers with disabilities that are referenced in §303.303(b); and</p> <p>(2) An effective method is developed and implemented to identify children who are in need of early intervention services.</p> <p>In accordance with Early Intervention Operational Standards VI(a)(1) pg. 22 Under EI Operational Standard § VI(a)(1), the program is required to provide a face-to-face or telephone response to the parent made within 14 calendar days following the initial referral. Attempts to contact the parent of a child referred are documented in the record. An infant or toddler may be re-referred at any time prior to his/her third birthday.</p>			
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**DATA**

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
<p><b>2.1 Timely Data Submitted in EICS</b> Under Federal Regulation (34 CFR §303.124) (a) Each statewide system must include a system for compiling and reporting timely and accurate data that meets the requirements in §303.124(b) of this section and §§303.700 through 303.702 and 303.720 through 303.724. (b) The data system required in §303.124(a) of this section must include a description of the process that the State uses, or will use, to compile data on infants or toddlers with disabilities receiving early intervention services under this part</p> <p>In accordance with Early Intervention Operational Standards Program Administration § XII E pg. 60 Early Intervention programs are expected to submit the data requested by the Department of Public Health within the timelines established.</p>	<p>2.1 During record reviews, the EI Division found that the program did not consistently meet the timely data submitted in EICS requirement.</p> <p>The EI division reviewed a total of 10 child records for satisfactory demonstration (100% compliance) of timely data submitted in EICS requirements. A total of 1 of these records demonstrated that the program did not complete the timely data submitted in EICS requirement.</p>	<p>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, the EI Division finds that:</p> <p>2.1 The program does not complete the adherence to timely data requirements, as required under 34 C.F.R. §303.124 and in accordance with Early Intervention Operational Standards Program Administration § XII E pg. 60.</p>	<p><b>CORRECTED AND CLOSED</b></p>

