



The Commonwealth of Massachusetts
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June 22, 2026

Dr. Paulo Guilhardi, LABA, BCBA-D
Beacon ABA Services
300 E Main Street #103
Milford, MA 01757
pguilhardi@beaconservices.org

Dear Paulo,

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, insurance verification, 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 Beacon ABA Services and families that participated in Part C services at Beacon ABA Services. 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 2 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: Compliance, Results, or Dispute Resolution. Therefore, these items are not included in the narrative below.

Summary of Monitoring Priorities and Outcomes

MONITORING COMPONENT	FINDINGS SUMMARY
Data	1.1 The EI Division finds that the program does not complete the timely data requirements, as required under 34 C.F.R. § 303.124 and memorandum 25-09-11.
Fiscal	2.1 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.

The EI Division appreciates Beacon ABA Services' continued efforts to improve the implementation of IDEA Part C and the development and implementation of a reasonably designed Early Intensive Behavioral Intervention (EIBI) 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 Woodward

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

Andrew Pursley, Finance Manager, Early Intervention Division

DATA

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
1.1 Timely Data Under 34 CFR § 303.124, data collection- (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 Additionally, under Memorandum 25-09-11, Early Intervention Service Programs and Specialty Service Programs are required to have timely, accurate, and complete data entry in the Early Intervention Client System (EICS).	1.1 The EI Division finds that the program does not complete the timely data requirements, as required under 34 C.F.R. § 303.124 and memorandum 25-09-11. During record reviews, the EI Division found that the program did not consistently meet the timely data entry requirements; entering data into the EICS within 14 days of the event occurring. The EI division reviewed a total of 10 child records for satisfactory demonstration (100%) of timely data requirements. A total of 2 of these records demonstrated that the program did not complete the timely data 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: 1.1 The EI Division finds that the program does not complete the timely data requirements, as required under 34 C.F.R. § 303.124 and memorandum 25-09-11.	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 timely data entry requirements, 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
2.1 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)	2.1 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: 2.1 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.