



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
250 Washington Street, Boston, MA 02108-4619
617-624-6000 | mass.gov/dph

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Kiame Mahaniah, MD, MBA
Secretary

Robert Goldstein, MD, PhD
Commissioner

June 22, 2026

Melanie Griffin
Boston Children's Hospital
75 Bickford Street
Jamaica Plain, MA 02130

Dear Melanie,

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 Boston Children's Hospital EI program and families that participated in Part C

services at Boston Children's. 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 9 findings of noncompliance with IDEA and state requirements described in further detail in the monitoring report, including any required actions.

Summary of Monitoring Priorities and Outcomes

MONITORING COMPONENT	FINDINGS SUMMARY
Compliance	1.1 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 program has not established reasonably designed timely services policies as required under 34 CFR 303.342 and EIOS page 28. 1.3 The EI Division finds that the EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to ongoing service delivery requirements 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 has not established reasonably designed evaluation policies as required under EIOS page 11. 2.2 The EI Division finds that the EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to requirements to provide prior written notice in the native language 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 the requirement to provide prior written notice for transition conferences under 34 CFR §303.421.

Data	4.1 The EI Division finds that the EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to the timely data requirements under 34 CFR § 303.124 and EIOS page 60.
Fiscal	5.1 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. 5.2 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 Boston Children’s Hospital’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 in the Native Language 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.	During record reviews, the EI Division found that the program did not consistently meet the requirement to provide the IFSP in the native language. The EI Division reviewed a total of 10 child records for satisfactory demonstration of 100%. A total of 1 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 program does not complete the requirement to provide IFSPs in the family’s native language under (34 CFR 303.342 (d) (1).	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% IFSPs in the family’s native language, as evidenced by the EI Division’s review of subsequent records.
1.2 Timely Services Under, Federal Regulation 34 CFR § 303.342 Each early intervention service must be provided as soon as possible after the parent provides consent for that service. In accordance with Early Intervention Operational Standards, Page 28:	During policy review, the EI Division specifically identified that the program’s policy did not include a process to provide services consented to on the IFSP within 30 days.	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 program has not established reasonably designed timely services policies as required under 34 CFR § 303.342 and EIOS pg. 28.	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 timely services. The policies and procedures must ensure that the program’s process is reasonably designed as required by 34

IFSP services for which consent has been provided must occur as soon as possible but no later than 30 days after consent has been granted.			CFR § 303.342 and EIOS pg. 28.
1.3 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 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).	During record reviews, the EI Division found that the program did not consistently meet the requirement of service delivery at the frequency consented to by the parents on the IFSP. The EI Division reviewed a total of 10 child records for satisfactory demonstration of 100%. A total of 4/10 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 the requirements that: - Ongoing Services are provided that reflect the IFSP including frequency, length and discipline - Service coordinators facilitate and monitor the delivery of services to ensure that the services are	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: 1.3 The EI Division finds that the EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to ongoing service delivery requirements under EIOS Page 32 and (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)).	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 Service Delivery. The policies and procedures must ensure that the program's process is reasonably designed as required by 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: 2. Demonstration of 100% consistent service delivery, as evidenced by the EI Division's review of subsequent records.

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;	provided in a timely manner - Service Coordinators conduct follow-up activities to determine that appropriate Part C services are being provided		
--	---	--	--

RESULTS

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
2.1 Evaluation Under EIOS, page 11: DETERMINATION OF ELIGIBILITY Massachusetts Department of Public Health Certified Early Intervention programs determine eligibility through an evaluation conducted by a multidisciplinary team based on informed clinical opinion and utilizing a DPH-approved developmental inventory tool. The Battelle Developmental Inventory, 2nd Edition ("BDI-2")* is used to establish eligibility by delay for all children entering the system. *Updated to BDI-3 on January 6, 2025.	During policy review, the EI Division specifically identified that the programs policy did not include reference to the Battelle Developmental Inventory 3, (BDI-3), as the DPH approved tool for determining eligibility.	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 has not established reasonably designed evaluation policies as required under EIOS page 11.	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 determining eligibility. The policies and procedures must ensure that the program's process is reasonably designed as required by EIOS Page 11.

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.	During record reviews, the EI Division found that the program did not consistently meet the requirement to provide prior written notice in the family’s native language. The EI Division reviewed a total of 10 child records for satisfactory demonstration of 100%. A total of 10 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 are required to be conducted in a family’s native language and the requirement to translate the IFSP and prior written notice documents.	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 EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to requirements to provide prior written notice in the native language 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 native language. 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: 2. 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 Under Federal Regulation 34 CFR §303.421	During record reviews, the EI Division found that the program did not consistently meet the	The EI Division’s analysis is based on documents and information provided by the program, records	Policies and procedures—

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.	requirement to provide prior written notice for the transition conference. The EI Division reviewed a total of 10 child records for satisfactory demonstration of 100%. A total of 10 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.	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 the requirement to provide prior written notice for transition conferences under 34 CFR §303.421.	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 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: 2. Demonstration of 100% prior written notices for transition conferences, as evidenced by the EI Divisions review of subsequent records.
--	--	---	---

DATA

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
4.1 Timely Data Under Federal Regulation 34 CFR § 303.124:(a) Each statewide system	During policy review, the EI Division specifically identified that the	The EI Division's analysis is based on documents and information	Policies and procedures—

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 In accordance with Early Intervention Operational Standards pg. 60: Early Intervention programs are expected to submit the data requested by the Department of Public Health within the timelines established.	program's policy did not include the process for submitting data to EICS in a timely manner, within 14 days of the activity. During interviews, it was identified that the program's implementation of its policies and procedures does not ensure compliance with timely data requirements, as during interviews, staff were unable to identify the requirement.	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 EIS program has not established policies and procedures to ensure appropriate demonstration of and adherence to the timely data requirements under 34 CFR § 303.124 and EIOS page 60.	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 timely data. The policies and procedures must ensure that the program's process is reasonably designed as required by 34 CFR § 303.124 and EIOS page 60. 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. Procedures that demonstrate that the EIS program has conducted training activities and has a monitoring process to ensure its early intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically timely data requirements under 34 CFR § 303.124 and EIOS page 60.
--	---	--	---

FISCAL

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
5.1 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 are submitted to the appropriate payor. (Early Intervention Division Reimbursement Policy Manual version 11, Page 4)	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 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: 5.1 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.	Policies and procedures—within 90 days of the date of this monitoring report the program must submit to the EI Division: Policies and procedures documenting the 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).
5.2 Parental Refusal to Access Insurance Prior to obtaining parental consent, contracted programs are required to inform parents, in writing and in the native language	During policy review, the EI Division specifically identified that the programs policy did not include specific procedures for providing	The EI Division's analysis is based on documents and information provided by the program, records located within the EICS, as well as	Policies and procedures—within 90 days of the date of this monitoring report the program must submit to the EI Division:

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)	documentation in the native language of the parents detailing their rights relating to consent before obtaining said consent.	interviews with program staff and families/caregivers. Based on this analysis: 5.2 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 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 520.
--	---	--	---