



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
Denise Spencer
Criterion Medford EI
3 Woodland Road Suite, Suite 119
Stoneham, MA
DSpencer@criterionchild.com

Dear Denise,

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 Indicators (45 Day IFSP timeline, timely services, service delivery, and supervision)
- Results Indicators (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 Criterion Medford EI and families that participated in Part C services at

Criterion Medford EI. 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.

Summary of Monitoring Priorities and Outcomes

MONITORING COMPONENT	FINDINGS SUMMARY
Compliance	1.1 The EI Division finds that the program does not complete the service delivery requirements under Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2)) and in accordance with Early Intervention Operational Standards Early Intervention Services (EIOS) § VII. C.3 pg. 32.
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 Criterion Medford EI'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,

Kasey Jaynes

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 Service Delivery (Consent and Accuracy) Under, Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2)) As used in paragraph (d)(1)(i) of this section— Service Provision: As a condition of receiving assistance under Part C of the 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).	1.1 During record reviews, the EI Division found that the program did not consistently meet the Service Delivery requirement. The EI division reviewed a total of 10 child records for satisfactory demonstration of 100% Service Delivery requirements. A total of 1 of these records demonstrated that the program did not complete the Service Delivery 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 service delivery requirements under Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2)) and in accordance with Early Intervention Operational Standards Early Intervention Services (EIOS) § VII. C.3 pg. 32.	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.

In accordance with Early Intervention Operational Standards Early Intervention Services (EIOS) § VII. C.3 pg. 32 Conducting activities which ensure the timely and consistent delivery of IFSP (Part C) services.			
---	--	--	--

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 programs 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 520.