



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

**November 24, 2025**

Mary Bishop  
Criterion Stoneham Early Intervention Program  
3 Woodland Road, Suite 216  
Stoneham, MA 02180

Dear Mary,

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 Criterion Stoneham dated June 23, 2025. Based upon the EI Division's analysis of the revised policies and procedures and/or evidence submitted by Criterion Stoneham, as well as subsequent data pulled from the Early Intervention Client System on November 10, 2025, for all relevant requirements, the EI Division has determined that Criterion Stoneham 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 Criterion Stoneham.

The EI Division appreciates Criterion Stoneham'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 [julie.longpre@mass.gov](mailto:julie.longpre@mass.gov).

Sincerely,

*Julie Longpre*  
Clinical Oversight and Support Specialist

Molly Gilbride, Clinical Quality Manager, Early Intervention Division

**FISCAL**

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
<p><b>1.1 Encounter and Charge Claims submitted accurately</b></p> <p>(34 CFR § 303.510(a))            Except as provided in § 303.510(b) of this section, funds under this part may not be used to satisfy a financial commitment for services that would otherwise have been paid for from another public or private source, including any medical program administered by the Department of Defense, but for the enactment of part C of the Act. Therefore, funds under this part may be used only for early intervention services that an infant or toddler with a disability needs but is not currently entitled to receive or have payment made from any other Federal, State, local, or private source (subject to §§ 303.520 and 303.521).</p> <p>Reimbursement Policy Manual for EI Services            Pg. 16            Claims Processing Validations            Charge claims and encounter claims are required to match the service log data on the Progress</p>	<p><b>1.1</b></p> <p>During record reviews, the EI Division found that the program did not consistently meet the Encounter and Charge Claims submitted accurately requirement.</p> <p>The EI division reviewed a total of 10 child records for satisfactory demonstration (100% compliance) of Encounter and Charge Claims submitted accurately requirements. A total of 4 of these records demonstrated that the program's encounter claim procedure codes listed in the claims in EICS did not match a code that is in the reimbursement manual.</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><b>1.1</b></p> <p>The program does not complete the Encounter and Charge Claims submitted accurately requirements under (34 CFR § 303.510(a)).</p>	<p><b>CORRECTED AND CLOSED</b></p>

<p>Note in the DPH EI Client System. This includes: Date of Services Hours Service (Based on the value passed in the Procedure Description field in the 837 transaction. See Appendix 6: Service Codes and Rates for expected values.)</p>			
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