



The Commonwealth of Massachusetts
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6/22/26

Rachael Cracknell

Harbor Area Early Intervention/North Suffolk Community Services

130 Condor St. East Boston MA 02128

Rcracknell@Northsuffolk.org

Dear Rachael,

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 Harbor Area Early Intervention and families that participated in Part C

services at Harbor Area Early Intervention. 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 4 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: Results or Dispute Resolution. Therefore, these items are not included in the narrative below.

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.
Data	2.1 The EI Division finds that the program does not complete the timely data requirements under Federal Regulation (34 CFR § 303.124) and in accordance with Early Intervention Operational Standards Program Administration § XII E pg. 60.
Fiscal	3.1 The EI Division finds that the program does not complete the claims service log validation requirements under Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services, version 11 p.10. 3.2 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 Harbor Area Early Intervention'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,

Susan Grossman, M.S.,
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 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). 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.	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 13 child records for satisfactory demonstration (100%) of Service Delivery requirements. A total of 4 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. 100% consistent ongoing service delivery, as evidenced by the EI Division's 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
2.1 Timely Data 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 Additionally, under Memorandum 25-09-11, Early Intervention Service Programs are required to have timely, accurate, and complete data entry in the Early Intervention Client System (EICS).	2.1 During record reviews, the EI Division found that the program did not consistently meet the timely data entry requirements. The EI division reviewed a total of 13 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: 2.1 The EI Division finds that the program does not complete the Timely Data submitted in EICS requirement under Federal Regulation (34 CFR § 303.124) and in accordance with Early Intervention Operational Standards Program Administration § XII E pg. 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: 1. Demonstration of 100% timely data 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
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3.1 Claims Charge claims and encounter claims are required to match the service log data on the Progress Note in the DPH EI Client System. (Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services, version 11 p.10)	3.1 During record reviews, the EI Division found that the program did not consistently meet the claims service log validation requirements. The EI division reviewed a total of 11 child records for satisfactory demonstration (100%) of claims service log validation requirements. A total of 9 of these records demonstrated that the program did not complete the claims service log validation requirements.	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: 3.1 The EI Division finds that the program has not established reasonably designed claim service log validation requirement procedures as required in accordance with Massachusetts Department of Public Health Reimbursement Policy Manual for Early Intervention and EIBI Services, version 11 Page 10.	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% claims service log validation, as evidenced by the EI Division's review of subsequent records.
3.2 Parental Refusal to Access Insurance Prior to obtaining parental consent, contracted programs are required to inform parents, in writing and in the native language of the parents, of their rights regarding consent to	3.2 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	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:	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

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)	their rights relating to consent before obtaining said consent.	3.2 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.	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.
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