The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

250 Washington Street, Boston, MA 02108-4619



KATHLEEN E. WALSH

Secretary

ROBERT GOLDSTEIN, MD, PhD Commissioner

**Tel: 617-624-6000**

**www.mass.gov/dph**

MAURA T. HEALEY

Governor

KIMBERLEY DRISCOLL

Lieutenant Governor

Alex Chatfield

Minute Man Arc Early Intervention Program

289 Great Rd., Suite 100

Acton, MA 01720

June 23, 2025

Dear Alex:

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 transition)
* Results Indicators (services provided in the natural environment, child find and referral, 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 Minute Man Arc. and families that participated in Part C services at Minute Man Arc. 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 5 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 component: Fiscal. Therefore, these items are not included in the narrative below.

Summary of Monitoring Priorities and Outcomes

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| MONITORING COMPONENT | FINDINGS SUMMARY |
| Compliance | * 1. The EI Division finds that the EIS program has not completed the requirement to provide consistent service delivery as determined through the IFSP process and consented to by the parent as required under EIOS Page 32 and (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)).   2. The EI Division finds that the program has not established reasonably designed policies that detail all transition requirements and timelines, as required under 34 CFR §303.209, EIOS pages 35-42. |
| Results | * 1. The EI Division finds that the program has not established reasonably designed policies on native language ensuring prior written notice is provided in the family’s native language as required under 34 CFR § 303.421 and EIOS page 64. |
| Dispute Resolution | * 1. The EI Division finds that the program has not established reasonably designed policies on procedural safeguards ensuring prior written notice is provided in the family’s native language as required under 34 CFR § 303.421 and EIOS page 64. |
| Data | * 1. The EI Division finds that the program does not complete the timely data requirements under 34 CFR § 303.124 and EIOS page 60. |

The EI Division appreciates Minute Man’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 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**

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| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| **1.1** Under, Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)):  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 Policies, page 32:  C. SERVICE COORDINATION  Conducting activities which ensure the timely and consistent delivery of IFSP (Part C) services; | 1.1 Finding Summary  During record reviews, the EI Division found that the program did not consistently meet the requirement of consistent services as consented to on the IFSP. The EI division reviewed a total of 10 child records for satisfactory demonstration (100% compliance) of service delivery requirements. A total of 1 of these records demonstrated that the program did not complete the service delivery 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, the EI Division finds that:   * 1. The program does not complete the requirement to provide consistent service delivery as determined through the IFSP process and consented to by the parent as required under 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: Demonstration of 100% consistent service delivery of services consented to on the IFSP, as evidenced by the EI Division’s review of subsequent records. |
| **1.2** Under, 34 CFR §303.209 (d) and EIOS page 35  The IFSP must include the steps and services to be taken to support the smooth transition of the child, in accordance with §§ 303.209 and 303.211(b)(6), from part C services (34 CFR 303.209(d)(2))  It establishes a transition plan in the IFSP not fewer than 90 days—and, at the discretion of all parties, not more than 9 months—before the toddler's third birthday; and  (3) The transition plan in the IFSP includes, consistent with § 303.344(h), as appropriate—  (i) Steps for the toddler with a disability and his or her family to exit from the part C program; and  (ii) Any transition services that the IFSP Team identifies as needed by that toddler and his or her family.  Under Sec. 303.209 (b) (1) (i) and EIOS Page 40:  Not fewer than 90 days before the third birthday of the toddler with a disability if that toddler may be eligible for preschool services under part B of the Act, the lead agency notifies the SEA and the LEA for the area in which the toddler resides that the toddler on his or her third birthday will reach the age of eligibility for services under part B of the Act. | 1.2  During policy review, the EI Division specifically identified that the program’s policy did not include the federal timelines for transition activities including transition planning and LEA referral. | 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, the EI Division finds that:    1.2 The program has not established reasonably designed policies that detail all transition requirements and timelines, as required under 34 CFR §303.209, EIOS pages 35-42. | 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 transition timelines. The policies and procedures must ensure that the program’s process is reasonably designed as required by 34 CFR §303.209, EIOS pages 35-42. |

**RESULTS**

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| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| **2.1** Federal Regulation  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. | 2.1  During policy review, the EI Division specifically identified that the program’s policy around native language did not include references to prior written notice as a document required to be provided in the family’s native language. | 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, the EI Division finds that:    2.1  The EI Division finds that the program has not established reasonably designed policies on native language ensuring prior written notice is provided in the family’s native language as required under 34 CFR § 303.421 and EIOS page 64. | 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 translation of all required documents, including prior written notice, into a family’s native language. The policies and procedures must ensure that the program’s process is reasonably designed as required by 34 CFR § 303.421 and EIOS page 64. |

**DISPUTE RESOLUTION**

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| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| **3.1**  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. | 3.1    During policy review, the EI Division specifically identified that the program’s policy on procedural safeguards and prior written notice did not include the requirement that prior written notice is required to be translated into the family’s native language. | 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, the EI Division finds that:    3.1 The EI Division finds that the program has not established reasonably designed policies on procedural safeguards ensuring prior written notice is provided in the family’s native language as required under 34 CFR § 303.421 and EIOS page 64. | 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 providing prior written notice in a family’s native language. The policies and procedures must ensure that the program’s process is reasonably designed as required by 34 CFR § 303.421 and EIOS page 64. |

**DATA**

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| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| **4.1**  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  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. | 4.1  During record reviews, the EI Division found that the program did not consistently meet the requirement for timely data entry. The EI Division reviewed a total of 10 child records for satisfactory demonstration (100% compliance) of timely data requirements. A total of 5 of these records demonstrated that the program did not complete the timely data. | 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, the EI Division finds that:    4.1  The program does not complete the timely data requirements under 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: 1. Demonstration of 100% of EMR data uploads within 14 days of the activity, as evidenced by the EI Division’s review of subsequent records as required by 34 CFR § 303.124 and EIOS page 60. |