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

Sara Frazier

Mentor South Bay

1115 W. Chestnut St.

Brockton, MA 02301

Sara.Frazier@sevitahealth.com

June 23, 2025

Dear Sara,

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, insurance verification, 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 Mentor South Bay EIBI and families that participated in Part C services at Mentor South Bay. 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 10 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: 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 EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to post referral timeline (45 day) requirements as required under 34 C.F.R. § 303.310 (post referral timeline) and SSP OS § V(e).  1.2 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to timely service (30 day) requirements, as required under 34 C.F.R § 303.342(e), EIOS §VII(C), and SSP OS § V(e).  1.3 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to service delivery requirements under 34 C.F.R. §§303.344(d)(1) and (i).  1.4 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to supervision requirements under SSP OS §VII. |
| Results | 2.1 The EI Division finds that the EIBI program’s implementation of its policies and procedures does not ensure compliance with eligibility, evaluation, and assessment requirements, specifically individualized services, including staff training and parent involvement, as required under SSP OS §VII.  2.2 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to initial referral requirements, as required under EIOS § VI(a)(1) and SSP OS § V(a). |
| Data | 4.1 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to timely data requirements, as required under 34 C.F.R. § 303.124 and SSP OS § I.  4.2 The EI Division finds that the EIBI program’s implementation of its policies and procedures does not ensure compliance with data accuracy requirements, as required under 34 C.F.R. § 303.124 and SSP OS § I, including staff training and parent involvement. |
| Fiscal | 5.1 The EI Division finds that the EIBI program does not ensure submission of accurate charge and encounter claims, as required under 34 C.F.R. § 303.520 and the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services.  5.2 The EI Division finds that the EIBI program has not established reasonably designed insurance verification policies as required under 34 C.F.R §303.510 and the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services. |

The EI Division appreciates Mentor South Bay’s continued efforts to improve the implementation of IDEA Part C and the development and implementation of a reasonably designed Early Intensive Behavioral Intervention (EIBI) 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 Woodward, 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. **Post Referral Timeline**   Under 34 C.F.R § 303.310(a) the initial evaluation and the initial assessments of the child and family under [§ 303.321](https://www.ecfr.gov/current/title-34/section-303.321); and the initial IFSP meeting under [§ 303.342](https://www.ecfr.gov/current/title-34/section-303.342) must be completed within 45 days from the date the lead agency or EIS provider receives the referral of the child.  Additionally, SSP OS § V(e)., requires that an SSP has 45 days from the receipt of referral from the EI program to conduct an assessment, develop a treatment plan, and proceed to the IFSP meeting scheduled by the service coordinator. | 1.1 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to post referral timeline (45 day) requirements as required under 34 C.F.R. § 303.310 (post referral timeline) and SSP OS § V(e).  During record reviews, the EI Division found that the program did not consistently meet the post referral timeline. The EI division reviewed a total of 5 child records for satisfactory demonstration (100% compliance) of post referral timeline requirements. A total of 3 of these records demonstrated that the program did not complete the post referral timeline requirement.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with post referral timeline requirements. Staff were unable to identify the post referral timeline requirements and families reported long waiting times for the assessment. | 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:    The EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to post referral timeline (45 day) requirements as required under 34 C.F.R. § 303.310 (post referral timeline) and SSP OS § V(e). | 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% compliance with post referral timeline, as evidenced by the EI Divisions review of subsequent records.Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically, post referral timeline requirements. |
| * 1. **Timely Service**   Under 34 C.F.R § 303.342(e), each early intervention service must be provided as soon as possible after the parent provides consent for that service, as required in §303.344(f)(1).  In accordance with EIOS §VII(C), the Early Intervention services for which parental consent is obtained must be provided within 30 days of parental consent.  Additionally, SSP OS § V(e)., requires that once the IFSP meeting is completed and SSP services are added to the plan and consented to by the family, the SSP has 30 days to provide the first service. | 1.2 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to timely service (30 day) requirements, as required under 34 C.F.R § 303.342(e), EIOS §VII(C), and SSP OS § V(e).  During record reviews, the EI Division found that the program did not consistently meet the timely service requirement. The EI division reviewed a total of 5 child records for satisfactory demonstration (100% compliance) of timely service requirements. A total of 2 of these records demonstrated that the program did not complete the timely service requirement.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with timely services. Staff were unable to identify timely service requirements and families reported not receiving services in a timely manner. | 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:  The EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to timely service (30 day) requirements, as required under 34 C.F.R § 303.342(e), EIOS §VII(C), and SSP OS § V(e). | 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% timely services, as evidenced by the EI Divisions review of subsequent records.Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically, timely service requirements. |
| * 1. **Service Delivery**   Under 34 C.F.R. §§303.344(d)(1) and (i) the IFSP must include a statement of the specific early intervention services, based on peer-reviewed research (to the extent practicable), that are necessary to meet the unique needs of the child and the family to achieve the results or outcomes identified in paragraph (c) of this section, including— the length, duration, frequency, intensity, and method of delivering the early intervention services. | 1.3 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to service delivery requirements under 34 C.F.R. §§303.344(d)(1) and (i).  During record reviews, the EI Division found that the program did not consistently meet the service delivery requirements. The EI division reviewed a total of 5 child records for satisfactory demonstration (100% compliance) of service delivery requirements. A total of 5 of these records demonstrated that the program did not complete the service delivery requirement.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with service delivery. Families reported that they did not receive services as consented to on the IFSP. | 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:  The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to service delivery requirements under 34 C.F.R. §§303.344(d)(1) and (i). | 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% service delivery, as evidenced by the EI Divisions review of subsequent records.  1. Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically, service delivery requirements. |
| * 1. **Supervision**   In accordance with SSP OS §VII, clinical supervision is provided by all specialty service programs by appropriately credentialed staff to assess children’s progress, develop and monitor treatment programs, assist parents in the development of behavior management programs and train and supervise paraprofessionals in the application of treatment protocols.  Additionally, specialty service programs will adhere to the requirement of a minimum of 1 hour of Board-Certified Behavior Analyst, Licensed Applied Behavior Analyst (BCBA, LABA) supervision to every 10 hours of paraprofessional direct service provided. | 1.4 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to supervision requirements under SSP OS §VII.  During record reviews, the EI Division found that the program did not consistently adhere to supervision requirements. The EI division reviewed a total of 5 child records for satisfactory demonstration (100% compliance) of supervision requirements. A total of 3 of these records demonstrated that the program did not adhere to supervision requirements.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with supervision requirements. Families reported not receiving supervision services. | 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:  The EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to supervision requirements under SSP OS §VII. | 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% compliance with supervision requirements, as evidenced by the EI Divisions review of subsequent records.  1. Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically, supervision requirements. |

**RESULTS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| * 1. **Eligibility, Evaluation, and Assessment (Individualized)**   In accordance with SSP OS §VII, children and families receive individualized services, in accordance with the outcomes identified in the IFSP. Intervention is designed to include the child, staff member(s) and parent or designated caregiver. The parent is strongly encouraged to participate in intensive services, as outcome studies indicate that significantly more progress can be achieved with active parent involvement. If family circumstances preclude such participation (for example if services are provided at a childcare program), this is documented in the child’s record and alternative communication strategies are developed. Determinations of the number of hours per week of service are individualized, based on the particular child and family circumstances. Such factors as the child’s age, prevalence of the core characteristics of autism, behavioral characteristics, rate of progress, schedule of ancillary services, and family availability are taken into consideration. The amount of service can be adjusted at any time as child and family needs change and is documented through the IFSP review process. | 2.1 The EI Division finds that the EIBI program’s implementation of its policies and procedures does not ensure compliance with eligibility, evaluation, and assessment requirements, specifically individualized services, including staff training and parent involvement, as required under SSP OS §VII.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with eligibility, evaluation and assessment, specifically individualized services. Staff were unable to identify requirements and reported determining services based on staffing availability. Families reported that services were determined based on staffing availability, that families were not included in determining the number of hours their child received, and that services did not change based on their child’s changing needs. | 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:    The EIBI program’s implementation of its policies and procedures does not ensure compliance with eligibility, evaluation, and assessment requirements, specifically individualized services, including staff training and parent involvement, as required under SSP OS §VII. | 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: Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; eligibility, evaluation and assessment, specifically individualized services. |
| * 1. **Child Find- Referral**   Under EI Operational Standard § VI(a)(1), the program is required to provide a face-to-face or telephone response to the parent made within 14 calendar days following the initial referral. Attempts to contact the parent of a child referred are documented in the record. An infant or toddler may be re-referred at any time prior to his/her third birthday.  Additionally, SSP OS § V(a) requires the following: The SSP will contact the family to provide information about the agency and service model and answer any questions the family may have, andSSPs will notify the EI Service Coordinator of the result of that contact. | 2.2 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to initial referral requirements, as required under EIOS § VI(a)(1) and SSP OS § V(a).  During policy review, the EI Division specifically identified that the programs policy did not include timeline requirements and included language not in accordance with the delivery of EIBI services, specifically waitlists.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with initial referral timelines. Staff were unable to identify initial referral requirements and families reported being informed there was a waitlist. | 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:  The EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to initial referral requirements, as required under EIOS § VI(a)(1) and SSP OS § V(a). | 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 referral. The policies and procedures must ensure that the program’s process is reasonably designed as required by EIOS § VI(a)(1) and SSP OS § V(a). 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. Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically, referral requirements. |

**DATA**

|  |  |  |  |
| --- | --- | --- | --- |
| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| **4.1 Data Timely**  Under C.F.R. 303.124, data collection –  (a) each statewide system must include a system for compiling and reporting timely and accurate data that meets the requirements in [paragraph (b)](https://www.ecfr.gov/current/title-34/section-303.124#p-303.124(b)) of this section and [§§ 303.700](https://www.ecfr.gov/current/title-34/section-303.700) through [303.702](https://www.ecfr.gov/current/title-34/section-303.702) and [303.720](https://www.ecfr.gov/current/title-34/section-303.720) through [303.724](https://www.ecfr.gov/current/title-34/section-303.724).  (b) The data system required in [paragraph (a)](https://www.ecfr.gov/current/title-34/section-303.124#p-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 SSP OS § I, Autism SSP programs that are awarded contracts are required to utilize the EI Client System to enter client and service delivery data. | 4.1 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to timely data requirements, as required under 34 C.F.R. § 303.124 and SSP OS § I.  During record reviews, the EI Division found that the program did not consistently meet the timely data requirements. The EI division reviewed a total of 5 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 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, the EI Division finds that:    4.1 The EI Division finds that the EIBI program has not established policies and procedures to ensure appropriate demonstration of and adherence to timely data requirements, as required under 34 C.F.R. § 303.124 and SSP OS § I. | 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% timely data requirements, as evidenced by the EI Divisions review of subsequent records. |
| **4.2 Data Accuracy**  Under C.F.R. § 303.124, data collection –  (a) each statewide system must include a system for compiling and reporting timely and accurate data that meets the requirements in paragraph (b) of this section and §§ 303.700 through 303.702 and 303.720 through 303.724.  (b) The data system required in paragraph (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.  Under SSP OS § I, Autism SSP programs that are awarded contracts are required to utilize the EI Client System to enter client and service delivery data. | 4.2 The EI Division finds that the EIBI program’s implementation of its policies and procedures does not ensure compliance with data accuracy requirements, as required under 34 C.F.R. § 303.124 and SSP OS § I, including staff training and parent involvement.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with data accuracy requirements; staff were unable to identify data accuracy requirements, specifically identification of exceptional family circumstances. | 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:  The EIBI program’s implementation of its policies and procedures does not ensure compliance with data accuracy requirements, as required under 34 C.F.R. § 303.124 and SSP OS § I, including staff training and parent involvement. | 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. Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically, data accuracy, including exceptional family circumstances. |

**FISCAL**

|  |  |  |  |
| --- | --- | --- | --- |
| **Legal Requirement/State Standard** | Noncompliant Policy, Procedure or Practice and EI Division analysis | Conclusion/Finding | Next Steps and Required Actions |
| **5.1 Fiscal Claims**  Under C.F.R. § 303.500(a), each statewide system must include written policies and procedures that meet the requirements of the—  (1) Use of funds provisions in § 303.501; and  (2) Payor of last resort provisions in §§ 303.510 through 303.521 (regarding the identification and coordination of funding resources for, and the provision of, early intervention services under part C of the Act within the State).  (b) and a State may establish, consistent with §§ 303.13(a)(3) and 303.203(b), a system of payments for early intervention services under part C of the Act, including a schedule of sliding fees or cost participation fees (such as co-payments, premiums, or deductibles) required to be paid under Federal, State, local, or private programs of insurance or benefits for which the infant or toddler with a disability or the child's family is enrolled, that meets the requirements of §§ 303.520 and 303.521.  In accordance with the Massachusetts Department of Public Health’s Reimbursement Policy Manual for Early Intervention and Autism Services, charge claims and encounter claims are required to match the service log data on the Progress Note in the DPH EI Client system (pg.16), and Charge claims are additionally required to have insurance data that matches the Insurance data in the DPH EI Client System (pg.16). Additionally, EI agencies/programs are required to submit claims that accurately reflect the services that are provided to children and families enrolled in Early Intervention in Massachusetts (pg. 35). | 5.1 The EI Division finds that the EIBI program does not ensure submission of accurate charge and encounter claims, as required under 34 C.F.R. § 303.520 and the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services.  During record reviews, the EI Division found that the program did not consistently meet the claim requirements. The EI division reviewed a total of 5 child records for satisfactory demonstration (100% compliance) of claim requirements. A total of 1 of these records demonstrated that the program did not adhere to the claim requirements; specifically, that the claim did not match the service log data on the progress note in the DPH EI Client system.  During interviews, it was identified that the program’s implementation of its policies and procedures does not ensure compliance with claims. Staff were unable to identify claim requirements; specifically, that the charge claims and encounter claims are required to match the service log data on the Progress Note in the DPH EI Client system. | 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:    The EIBI program does not ensure submission of accurate charge and encounter claims, as required under 34 C.F.R. § 303.520 and the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services. | 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% compliance of claim requirements, as evidenced by the EI Divisions review of subsequent records.Procedures which demonstrate that the EIBI program has conducted training activities and has a monitoring process to ensure its early intensive behavioral intervention staff are trained to be knowledgeable on the provisions of IDEA Part C; specifically claim requirements. |
| **5.2 Insurance Verification**  Under, C.F.R. §303.510 Payor of Last Resort, (a) except as provided in [paragraph (b)](https://www.ecfr.gov/current/title-34/section-303.510#p-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](https://www.ecfr.gov/current/title-34/section-303.520) and [303.521](https://www.ecfr.gov/current/title-34/section-303.521)).  In accordance with the Massachusetts Department of Public Health’s Reimbursement Policy Manual for Early Intervention and Autism Services, EIBI providers are required to maintain complete, current, and accurate insurance information in the child's EI Client System record based on insurance verification activities. This includes: (1) determination of the EI benefits and/or Autism benefits for each insurance on a regular basis. (2) selection of the correct insurance coverage type. This indicates if the insurance is Fully Insured, Self-Insured, HSA, Federal, Union, Out-of-State (3) identification of children who are uninsured, and maintain documentation from the guardian(s) confirming an uninsured status or request to decline access to the child's insurance. This must be documented in the EI Client System within the child's enrollment record. | 5.2 The EI Division finds that the EIBI program has not established reasonably designed insurance verification policies as required under 34 C.F.R §303.510 and the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services  During policy review, the EI Division specifically identified that the programs policy did not include procedures related to uninsured status or request to decline access. | 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:  The EIBI program has not established reasonably designed insurance verification policies as required under 34 C.F.R §303.510 and the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services | 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 insurance verification. The policies and procedures must ensure that the program’s process is reasonably designed as required by the MA DPH Reimbursement Policy Manual for Early Intervention and Autism Services. |