The Commonwealth of Massachusetts

Executive Office of Health and Human Services

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Perkins School for the Blind

175 North Beacon St.  
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June 30, 2025

Dear Teri,

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)
* 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 Programs and families that participated in Part C services at Perkins. In addition to interviews, the EI Division reviewed records (e.g., 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 components: Dispute Resolution, Child Find, and 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 | 1.1 The EI Division finds that the program does not complete the *timely services requirement* to deliver services within 30 days of signed parent consent under Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2)  As used in paragraph (d)(1)(i); Early Intervention Operational Standards, page 28 Section VII; Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2); and Contract conditions DPH RFR Document Number: 211030  1.2 The EI Division finds that the program has not established reasonably designed policies and procedures to ensure appropriate demonstration of and adherence to service delivery requirements under EIOS Page 32 and (34 CFR 303.344(d)(1); and contract conditions DPH RFR Document Number: 211030. |
| Results | 2.1 The EI Division finds that the program has not established reasonably designed policies and procedures to ensure compliance with eligibility, evaluation and assessment requirements, specifically the annual family satisfaction assessment under contract conditions DPH RFR Document Number: 211030. |
| Dispute Resolution |  |
| Child Find |  |
| Data | 3.1 The EI Division finds that the program has not established reasonably designed policies and procedures to ensure compliance with the timely data requirement under Federal Regulation (34 CFR § 303.124), Early Intervention Operational Standards Program Administration § XII E pg. 60, and Contract conditions DPH RFR Document Number: 211030.  3.2 The EI Division finds that the program does not complete the data accuracy requirements under Federal Regulation (34 CFR § 303.124), and contract conditions DPH RFR Document Number: 211030. |
| Fiscal |  |

The EI Division appreciates Perkins School for the Blind Infant Toddler Program’s

continued efforts to improve the implementation of IDEA Part C and the development and implementation of a reasonably designed specialty services program for children with vision loss 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,

Marian C. Hartblay, M.A.T., M.E.D.

Clinical Oversight and Support Specialist

Low Incidence Disabilities

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 Timely Services**  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, page 28 Section VII, Individual Family Service Plan Development E IFSP components, 8. The start date of the IFSP, which is the date of parental written consent. IFSP services for which consent has been provided must occur as soon as possible but no later than 30 days after consent has been granted.  Additionally, contract conditions DPH RFR Document Number: 211030. Program has procedures in place to ensure delivery of Timely Services:  a.) 45-day evaluation  b.) 30-day delivery of services | 1.1 The EI Division finds that the program does not complete the *timely services requirement* to deliver services within 30 days of signed parent consent    During Record Reviews, the EI division found that the program did not consistently meet the timely services requirement. The EI Division reviewed a total of 10 child records for satisfactory demonstration (100% compliance) of timely service delivery within 30 days of signed consent requirements. A total of 2 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, the EI Division finds that:  1.1 The program does not consistently meet timely service delivery requirement within 30 days of family consent on the IFSP under requirements 34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2), Operational Standards, page 28 Section VII, and contract conditions DPH RFR Document Number: 211030 | Evidence of implementation:As soon as possible, but no laterthan one year from the date of thismonitoring report, the programmust demonstrate to the EIDivision:Demonstration of 100% service delivery within 30days of family consent on the IFSP as evidenced by the EI Division’s review of subsequent records. |
| **1.2 Service Delivery**  Under Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(1)(2)):  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, and,  **c**ontract conditions DPH RFR Document Number: 211030.  Program has procedures in place to ensure:  Providers collaborate with early intervention programs to meet the needs of enrolled children and families. 75% of client records affirm specialty service provider participation in IFSP meetings with Early Intervention staff. | 1.2 The EI Division finds that the program has not established reasonably designed policies and procedures to ensure appropriate demonstration of and adherence to service delivery requirements.  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 10 records for satisfactory demonstration (100% compliance) with service delivery requirements. A total of 5 of these records demonstrated that the program did not complete the service delivery requirement  During policy review, the EI Division specifically identified that the program’s policy did not include a policy for participating in at least 75% of IFSP meetings with early intervention staff. | 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, the EI Division finds that:  1.2 The 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)).  Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2) As used in paragraph (d)(1)(i); Federal Regulation (34 CFR 303.344(d)(1); 34 CFR 303.344(d)(2); (EIOS) § VII. C.3 pg. 32; and Contract conditions DPH RFR Document Number: 211030. | 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 participation in at least 75% of IFSP meetings.   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 consented to on the IFSP, as evidenced by the EI Division’s review of subsequent records. |

**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 Determining Eligibility Evaluation and Assessment**  In accordance with contract conditions DPH RFR Document Number: 211030. performance requirements, Specialty Vision Services, 2.3 Parents are included in all aspects of intensive treatment programs for children with visual impairment. Measure: Program carried out an annualassessment of family/consumer satisfaction employing a survey instrument and processing engaging in analysis to inform program planning and implementation. | 2.1 The EI Division finds that the program has not established reasonably designed policies and procedures to ensure compliance with eligibility, evaluation and assessment requirements, specifically the annual family satisfaction assessment.  During policy review, the EI Division specifically identified that the program’s policy did not include a process of annual dissemination of a tool to assess family satisfaction that can be used to inform programming. | 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:    2.1 The program has not established reasonably designed policies and procedures to ensure compliance with eligibility, evaluation and assessment requirements, specifically the annual family satisfaction assessment under contract conditions DPH RFR Document Number: 211030. | 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 annual dissemination and analysis of a family satisfaction survey instrument to inform program planning and implementation. |

**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 |
| **3.1 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  In accordance with Early Intervention Operational Standards  Program Administration § XII E pg. 60  Early Intervention programs are expected to submit the data requested by the Department of Public Health within the timelines established.  In accordance with contract conditions DPH RFR Document Number: 211030. Performance requirements, Program Administration, 3.3 Data and reports are submitted in a timely manner. | 3.1 The EI Division finds that the program has not established reasonably designed policies and procedures to ensure compliance with the timely data requirement.  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 10 records for satisfactory demonstration (100% compliance) with timely data requirements, a total of 1 of those records demonstrated that the program did not complete the 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. The EI Division finds that:  3.1 The program has not established reasonably designed policies and procedures to ensure compliance with the timely data requirement. | 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 Submitted into EICS, as evidenced by the EI Divisions review of subsequent additional records. |
| **3.2 Accurate 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.  In accordance with the Reimbursement Policy Manual for EI Services Pg. 8 Requirements for Billing EI General and Autism Services Document all services to meet clinical, billing and reporting needs. Individual client records must be available to DPH staff for routine monitoring.  Contract conditions DPH RFR Document Number: 211030. Percentage of data requests processed accurately and on time. | 3.2 The EI Division finds that the program does not complete the data accuracy requirements under Federal Regulation (34 CFR § 303.124), and contract conditions DPH RFR Document Number: 211030.  During record reviews, the EI Division found that the program did not consistently meet the Accurate Data requirements. The EI division reviewed a total of 10 child records for satisfactory demonstration (100% compliance) with accurate data requirements. A total of 2 of these records demonstrated that the program did not complete the accurate 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. The EI Division finds that:  3.2 The EI Division finds that the program does not complete the data accuracy requirements under Federal Regulation (34 CFR § 303.124), and contract conditions DPH RFR Document Number: 211030. | 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% Data Accuracy as evidenced by the EI Divisions review of subsequent additional records. |