



The Commonwealth of Massachusetts
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December 10, 2025

Joanne Sweeney
Riverside Early Intervention - Needham
255 Highland Avenue
Needham, MA 02494
jsweeney@riversidecc.org

Dear Joanne,

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 Riverside Early Intervention-Needham dated June 23, 2025. Based upon the EI Division's analysis of the revised policies and procedures and/or evidence submitted by Riverside Early Intervention- Needham, as well as subsequent data pulled from the Early Intervention Client System on November 4, 2025 for all relevant requirements, the EI Division has determined that Riverside Early Intervention- Needham 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, finding, required actions, EI Division analysis, and status of finding(s) based on the evidence received from Riverside Early Intervention- Needham.

The EI Division appreciates Riverside Early Intervention- Needham'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 faith.bombardier@mass.gov

Sincerely,
Faith Bombardier
Clinical Oversight & Support Specialist

Molly Gilbride
Clinical Quality Manager, Early Intervention Division

Results

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
<p>1.1 Services provided in the Natural Environment Under Federal Regulation 34 CFR § 303.344 (d) (1) 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— (i) The length, duration, frequency, intensity, and method of delivering the early intervention services. (ii) A statement that each early intervention service is provided in the natural environment for that child or service to the maximum extent appropriate, consistent with §§ 303.13(a)(8), 303.26 and 303.126, or, subject to paragraph (d)(1)(ii)(B) of this</p>	<p>1.1 During record reviews, the EI Division found that the program did not consistently meet the Services provided in the Natural Environment requirement. The EI division reviewed a total of 10 child records for satisfactory demonstration of 100% compliance with Services provided in the Natural Environment requirements. A total of 1 of these records demonstrated that the program did not complete the Services provided in the Natural Environment requirement, by not having a written justification in the record to as to why an early intervention service was not provided in the natural environment.</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: 1.1 The program did not complete the Services provided in the natural environment requirement under Federal Regulation 34 CFR § 303.344 (d) and in accordance with Early Intervention Operational Standards Individualized Family Service Plan Development § VII. E. 7, pg. 27.</p>	<p>CORRECTED and CLOSED</p>

<p>section, a justification as to why an early intervention service will not be provided in the natural environment.</p> <p>In accordance with Early Intervention Operational Standards Individualized Family Service Plan Development § VII. E. 7, pg. 27</p> <p>A statement of the natural settings in which Early Intervention will be provided, including justification of the extent to which the services will not be provided in a natural environment. Individualized clinical justification on the IFSP for services that do not occur in a natural setting (as determined by the parent and IFSP team) based on the child's unique needs, family routines, and identified measurable results or outcomes must include the following: An explanation of why the IFSP team determined that the outcomes could not be achieved in the child's natural settings; an explanation of how</p>			
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<p>the services provided in this setting will support measurable results or outcomes and the child's ability to function in his/her natural environment; and a plan with a timeline for providing Early Intervention services in a natural setting in order to achieve the outcomes identified on the IFSP.</p>			
<p>1.2 Documentation Provided in Families Native Language</p> <p>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.</p> <p>In Accordance with Early Intervention Operational</p>	<p>1.2 During record reviews, the EI Division found that the program did not consistently meet the Documentation Provided in Families Native Language requirement. The EI division reviewed a total of 10 child records for satisfactory demonstration of 100% compliance of Documentation Provided in Families Native Language requirements. A total of 1 of these records demonstrated that the program did not complete the Documentation Provided in Families Native Language requirement when providing prior written notice for the transition planning conference.</p>	<p>1.2 The EI Division finds that the program does not complete the Documentation Provided in Families Native Language requirements under, Federal Regulation 34 CFR § 303.421 and in Accordance with Early Intervention Operational Standards XIII Procedural Safeguards and Due Process Procedures A. Prior Written Notice Pg 64.</p>	<p>CORRECTED and CLOSED</p>

<p>Standards XIII Procedural Safeguards and Due Process Procedures A. Prior Written Notice Pg 64</p> <p>The notice must be:</p> <ul style="list-style-type: none">a. written in language understandable to the general public, andb. provided in the native language of the parents, unless it is clearly not feasible to do so.<ul style="list-style-type: none">1. If the native language (as defined in Section II of these standards) or other mode of communication is not written language, the service coordinator must:<ul style="list-style-type: none">a) translate the notice in a manner acceptable and understood by the parent,B) document that the notice has been translated in a manner acceptable and understood by the parent, andc) provide the parent an opportunity to discuss the contents of the notice and have questions answered.			
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Dispute Resolution

Legal Requirement/State Standard	Noncompliant Policy, Procedure or Practice and EI Division analysis	Conclusion/Finding	Next Steps and Required Actions
<p>2.1 Prior Written Notice</p> <p>Under, Federal Regulation 34 CFR §303.421 Prior written notice and procedural safeguards notice. a) General. Prior written notice must be provided to parents a reasonable time before the lead agency or an EIS provider proposes, or refuses, to initiate or change the identification, evaluation, or placement of their infant or toddler, or the provision of early intervention services to the infant or toddler with a disability and that infant's or toddler's family.</p>	<p>2.1</p> <p>During record reviews, the EI Division found that the program did not consistently meet the Prior Written Notice requirement. The EI division reviewed a total of 10 child records for satisfactory demonstration of 100% compliance of Prior written notice being sent for the Transition Conference requirement. A total of 5 of these records demonstrated that the program did not complete the Prior written notice requirement.</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>2.1</p> <p>The program does not complete the Prior Written Notice requirements Under, Federal Regulation 34 CFR §303.421 and in accordance with Early Intervention Operational Standards Procedural Safeguards and Due Process Procedures § XIII. A pg. 63- 65.</p>	<p>CORRECTED and CLOSED</p>

<p>In accordance with Early Intervention Operational Standards Procedural Safeguards and Due Process Procedures § XIII. A pg. 63- 65</p> <p>Families are provided written notice a reasonable time before an Early Intervention provider proposes to initiate or refuse an activity that relates to the identification, evaluation, or change in IFSP service; the provision of appropriate Early Intervention services; disclosure of personally identifiable information requiring consent; or accessing public or private reimbursement for service.</p> <p>Early Intervention programs are required to use the forms and notices provided by DPH when requesting consent or providing notice for the following activities unless approval has been granted by DPH for the program to use a different form:</p> <ul style="list-style-type: none">• evaluation/assessment to determine eligibility,• convening an IFSP meeting for the purpose of			
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developing an initial, subsequent or review of an IFSP, and • providing IFSP services (Universal IFSP form).			
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