



**Beyond Bubbles and Blocks**

Information for EI Home Visitors

**Do you know about monitoring in early intervention?**

As a condition of receiving [Individuals with Disabilities Education Act](https://sites.ed.gov/idea/) (IDEA) funds, the State agency (which is the Lead Agency under Part C) must have a general supervision system. This system includes multiple components, such as monitoring to — (1) improve educational results and functional outcomes for infants and toddlers with disabilities and (2) ensure that early intervention service (EIS) programs and providers meet the requirements under IDEA.

The Lead Agency is responsible for the general administration and supervision of all EIS programs and providers as well as activities to ensure the State complies with the requirements of IDEA Part C. Integrated Monitoring is one required, important component of a general supervision system. Integrated monitoring activities are a multifaceted formal process or system designed to examine and evaluate an EIS program’s or provider’s implementation of IDEA with a particular emphasis on educational results, functional outcomes, and compliance with IDEA programmatic requirements.

In Massachusetts, the Lead Agency under Part C (the Early Intervention Division) has a Performance, Evaluation, and Oversight (PEO) Unit responsible for integrated monitoring activities.

The Clinical Oversight and Support Specialists (COSS) on the PEO unit help provide oversight and supervision to the EIS programs in the State. As part of their responsibilities, they help implement the processes in place to monitor, train, and support contracted EIS programs and EIS providers​.

**What is monitored and when?**

The Office of Special Education Programs (OSEP) required priority areas for monitoring include:

* Early intervention services in natural environments
* Effective monitoring (State Performance Plan/Annual Performance Report indicators)
* Child Find
* A system of transition services
* The use of resolution sessions
* Examination of local policies, procedures, and evidence of implementation.

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The PEO unit conducts ongoing monitoring activities. The schedule of these activities includes:

* Monitoring Data Quality on a monthly basis (Data Quality Reports)
* Monitoring SPP/APR Compliance Indicators through data base reports on a quarterly basis (Indicators 1,7,8 Data base reports)
* Monitoring SPP/APR results indicators on an annual basis (Risk Assessment)
* Monitoring Policies and Procedures at the EIS program level on an annual basis (Self- Assessment)
* Monitoring Implementation of Part C IDEA on a 6-year cycle (Cyclical Monitoring)

**What is the process to identify noncompliance?**

Identification of noncompliance (i.e., a finding) means the determination by a State that an EIS program’s or provider’s policy, procedure, or practice, including those that are child-specific, is inconsistent with an applicable IDEA requirement.

Using established methods (e.g., data base reviews, risk assessment, self-assessments, data quality reports, and fiscal monitoring), the EI Division reviews programs for compliance with federal and state indicators and other priority areas identified to improve child and family outcomes and results.

If noncompliance is identified, the next step is to determine if it is isolated or systemic.

If the EI Division identifies noncompliance in the EIS program, they will promptly notify the EIS program in writing, specifying that the requirement is out of compliance. The EIS program must then correct the noncompliance as soon as possible and no later than one year from the notification date. To demonstrate that noncompliance has been corrected, the State must verify that the EIS program or provider:

* Is correctly implementing the specific regulatory requirements (i.e., achieved 100 percent compliance with the relevant IDEA requirements) based on a review of updated data and information.
* If applicable, has corrected each individual case of child-specific noncompliance unless the child is no longer within the jurisdiction of the EIS program or provider.

**What is an example?**

An EIS program is notified that systemic noncompliance in federal compliance Indicator 7 (Post Referral Timeline of 45 days) has been identified at their program. More specifically, the initial evaluation and the initial assessments of the child and family and the initial IFSP meeting must be completed within 45 days from the date the EIS provider receives the referral of the child under [§ 303.21](https://www.ecfr.gov/current/title-34/section-303.21) of IDEA.

This noncompliance was identified through a database report from the EI client system, which found that the EIS program was had 20 children who did not meet the 45-day timeline between July 1, 2023-September 30, 2023. The PEO unit identified through data analysis of these 20 children that this is happening across multiple children, multiple providers and service coordinators in the EIS program. As part of the EIS program’s required corrective action for this identified systemic noncompliance, the COSS that oversees this program will arrange a meeting to develop a Corrective Action Plan (CAP) for the program. During this meeting, the COSS and Program Director will identify the root cause of noncompliance including infrastructure, policies, and training aspects to develop a comprehensive plan for technical assistance and correction of this noncompliance.

**How does monitoring impact you as an EI provider?**

It is important for EI providers to understand the magnitude of child-specific and systemic compliance requirements, such as what is being monitored and why. These requirements are designed and monitored to ensure that infants, toddlers, and their families receive consistent and reliable EI services, thereby increasing the likelihood of improved child and family outcomes. The timelines and requirements identified in the federal regulations and Massachusetts Early Intervention Operational Standards help ensure that equitable access to timely service is delivered across the state. A family’s experience in EI and the likelihood to engage and partner with their provider can be impacted by the systems set up in the program to begin service delivery in the timeframes required.

**Resources**

* [Beyond Bubbles and Blocks Topics: Federal Indicators](https://www.mass.gov/lists/beyond-bubbles-and-blocks-newsletter)
* [State General Supervision Responsibilities Under Parts B and C of the IDEA](https://sites.ed.gov/idea/files/Guidance_on_State_General_Supervision_Responsibilities_under_Parts_B_and_C_of_IDEA-07-24-2023.pdf)