Transition and Pre-Employment Transition Services

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Purpose

The Workforce Innovation and Opportunity Act (WIOA) places emphasis on the provision of services to students and youth with disabilities to ensure that they have meaningful opportunities to receive the training and other services they need to achieve employment outcomes in competitive integrated employment. WIOA expanded not only the population of students and youth with disabilities who may receive services but also the kinds of services that the Iowa Department for the Blind (IDB) may provide to youth and students with disabilities who are transitioning from school to postsecondary education and employment. The expansion of the population to be served within the transition from school to employment includes “student with a disability” and “youth with a disability” and requirements related to pre-employment transition services (pre-ETS) and the provision of transition services to students and youth with disabilities. As such, WIOA requires IDB to reserve at least 15 percent of received Federal funds to provide and arrange for, in coordination with local educational agencies, the provision of pre-ETS to students with disabilities.

With the addition of Pre-ETS, IDB provides a continuum of vocational rehabilitation (VR) services, especially for students and youth with disabilities. If a student with a disability requires more intensive services, he or she may apply for VR services. Once determined eligible, an individualized plan for employment would be developed, which would outline the specific services that he or she may need in order to achieve an employment outcome. In sum, the VR program provides a range of services, from most basic to the most individualized and intensive service, thereby meeting the evolving needs of a student or a youth with a disability who is transitioning from school to post-school life.

## Pre-Employment Transition Services versus Transition Services

Vocational rehabilitation (VR) services to eligible individuals are provided on a continuum, with pre-ETS being the earliest set of services available to students with disabilities. Pre-ETS are designed to help students with disabilities to begin to identify career interests that may be further explored through additional VR program services, such as transition services and other individualized VR services. Furthermore, pre-employment transition services are only those services and activities listed in section 113 of the Act, as amended by WIOA. Transition services assist eligible individuals, including students or youth with disabilities, who have an approved Individualized Plan for Employment (IPE) develop and pursue career interests through services such as post-secondary education, vocational training, job search assistance, job placement services. Employment-related services assist eligible individuals further identify, develop and pursue career interests, offered through transition services and are pursuing specific employment outcomes through an IPE.

# Definitions:

### Pre-Employment Transition Services (Pre-ETS)

These services are the earliest set of services available to students with disabilities under the VR program. Pre-ETS are short-term in nature and designed to assist students with disabilities to begin to identify career interests which may be further explored through additional vocational rehabilitation (VR) services, such as transition services and other individualized VR services. Pre-ETS are available only to students with disabilities who are either eligible or potentially eligible for vocational rehabilitation services.

IDB can provide pre-employment transition services to any student who is blind, deaf-blind or has low vision and who needs these services, regardless of whether the student has applied for or been determined eligible for VR services (i.e., students who are eligible for VR services and those who are potentially eligible).

#### Required Pre-Employment Transition Services (Pre-ETS):

The following are required pre-employment transition services available to students with disabilities, including those who have been determined eligible for VR services as well as those who are potentially eligible:

* 1. Job exploration counseling,
	2. Work-based learning experiences, which may include in-school or after school opportunities or experience outside the traditional school setting (including paid work experiences) that is provided in an integrated environment to the maximum extent possible,
	3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education,
	4. Workplace readiness training to develop social skills and independent living, and
	5. Instruction in self-advocacy, which may include peer mentoring.

#### Pre-Employment Transition Coordination Activities:

Activities IDB must carry out are essential for arranging and providing pre-ETS.

#### Authorized Pre-Employment Transition Activities:

If funds remain, VR agencies may provide authorized activities to improve the transition of students with disabilities from school to postsecondary education or an employment outcome. Once a VR agency reserves sufficient funds for the provision of direct services to students who need them during a fiscal year (see **Fiscal Forecasting** for more information), the agency may allocate any remaining reserved funds for the “authorized” pre-ETS.

### Student with a disability

An individual who meets all of the following criteria:

* Is at least 14 years old but no more than 21 years of age (i.e., has not yet reached their 22nd birthday);
* Has a disability and has submitted the required qualifying medical documentation signed by a medical provider or a copy of their Individualized Education Program (IEP) or 504 plan.
* Has documentation confirming enrollment as a student in an educational program.

### Youth with a Disability

An individual with a disability who:

1. is not younger than 14 years of age; and
2. is not older than 24 years of age.
* **Guidance**: To be clear, a youth with a disability includes anyone who is also a student with a disability, because anyone who meets the definition of a student will also meet the definition of a youth (24 years of age or younger). However, once a student leaves school, they are no longer a student but are still considered a youth with a disability until they reach the age of 25. A student with a disability is eligible for Pre-employment Transition Services; a youth with a disability, who is not a student, is not eligible for Pre-employment Transition Services.

### Potentially eligible student

Includes, for purposes of pre-employment transition services, all students with disabilities, regardless of whether they have applied for or been determined eligible for the VR program. These students may not receive any VR services other than pre-ETS until they apply, are determined eligible for VR services, and have an approved IPE.

### Eligible Student

Includes students with a disability who has applied for and has been determined eligible for VR services. Eligible students can receive any VR services, including pre-ETS, necessary to assist them in achieving their employment outcome, so long as those services are identified on the approved IPE.

### VR Transition Services

A coordinated set of activities for students and youth with disabilities designed within an outcome-oriented process promoting movement from school to post-school activities, including post-secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. The coordinated set of activities must be based upon the individual student’s needs, considering the student’s preferences and interests, and must include instruction, community experiences, the development of employment and other post-school adult living objectives, and, if appropriate, acquisition of daily living skills and functional vocational evaluation. Transition services promote or facilitate the achievement of the employment outcome identified in the student’s Individualized Plan for Employment (IPE) and includesoutreach to and engagement of parents or, as appropriate, the representatives of students or youth with disabilities.

Following the continuum, transition services represent the next set of vocational rehabilitation services available to students and youth with disabilities. They are outcome-oriented and promote movement from school to post-school activities, including post-secondary education, vocational training, and competitive integrated employment. As such, transition services may include job-related services, such as job search and placement assistance, job retention services, follow-up services, and follow-along services, based on the needs of the individual.

Individualized transition services must be provided to students and youth who have been determined eligible for the VR program and in accordance with an approved individualized plan for employment. Transition services also may be provided in group settings to students and youth with disabilities. Although these group services are not individualized, they can still be beneficial for job exploration, including presentations from employers in the community and group mentoring activities.

The IDB VR program serves eligible transition aged individuals and their families by providing an array of VR services that give individuals the tools necessary to prepare for, secure, retain, or regain employment consistent with their unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. Coordination of services is a critical component of transition services; IDB collaborates with students, their families, and local education officials to facilitate the eligible student’s transition from the secondary educational setting to the receipt of VR services leading ultimately to employment.

Transition services refer to both those services provided to students and youth who have already been determined eligible for VR services. Transition services could include:

1. Attending Individualized Education Program (IEP) and transition planning meetings for students and youth in school and other recognized educational programs.
2. Providing appropriate outreach and information regarding IDB VR services to students and youth (or their representative, as appropriate), families, school counselors and transition coordinators.
3. Meeting with transition age students and parents to provide support, resources, counseling and other necessary services to assist with acceptance or adjustment to their disability.
4. Provide information and resources regarding potential work experiences
5. Coordinating services (both individually and within groups) to assist the students and youth and their families with general information regarding IDB VR services, career planning, post-secondary options, labor market information, employer needs, etc.
6. Participating in regional outreach activities to increase job opportunities by promoting the abilities and capabilities of the individuals who are blind, deafblind or have low vision.
7. Providing information, coordinator and assistance with referral for IDB VR services as well as referral to other programs or agencies as appropriate for the student or youth
8. Providing the student, youth and their family with information regarding service options (such as customized and supported employment) as well as the provision of career counseling and guidance related to sub-minimum wage employment and non-integrated employment settings
9. Gathering necessary documentation for the provision of pre-employment transition services and/or for application/eligibility for VR services
10. Providing and/or coordinating pre-employment transition services
11. For students and youth with disabilities who have been determined eligible and are under an IPE, those VR services that have been determined to be necessary to achieve the vocational goal.

# Target Population

Pre-ETS are available to individuals who meet the definition of a “Student with a Disability” who may need such services and who are eligible for VR services or potentially eligible for VR services.

## Determining who meets the Definition

IDB is the only entity that can verify that a student in Iowa meets the definition of a “student with a disability.” IDB staff must use the following guidance for determining who meets the definition:

* 1. Age Requirement.

The student must be between the ages of 14 and 21 years of age (through the remainder of the 21-year old’s last school year.)

* 1. **The student has a documented disability.**

Verification of the disability may be done in any of the following ways, as appropriate:

* + 1. Reviewing medical documentation signed by a medical provider.
		2. Reviewing a copy of an IEP or a 504 plan.
		3. Reviewing information provided by the student, their family, or another agency that indicates the individual has a disability.
	1. **Student enrollment in a recognized education program.**

Documentation of enrollment may include an IEP, 504 Plan, report card, college acceptance letter, college registration receipt, or other documentation from the educational program, and must be current each time a Pre-ETS Agreement is initiated to demonstrate that the student continues to qualify for these services.

Staff should collect documentation annually to verify that the student continues to meet the definition of a student with a disability. If documentation provided by the student indicates that the institution in which the student has enrolled has changed, the staff must complete a new Pre-ETS Agreement.

Documentation confirming enrollment may include information from the following:

* + 1. Secondary school, including home school and alternative school programs.
		2. Post-secondary education programs.
		3. Adult basic educational programs which lead to a recognized educational credential (e.g., Hi-SED)
		4. State, nationally, or industry recognized certificate programs leading to a credential (e.g., Certified Nursing Assistant, Microsoft Certification, Automotive Service Excellence Certification).
		5. Comprehensive Transition Programs (CTP) approved by the U.S. Department of Education (i.e., Northwester NEXT).
* **Guidance**: Once a student reaches age 22, unless they are still receiving services under IDEA and not older than the maximum age established by the Iowa Department of Education, they no longer meet the definition of a student with a disability. For example, a student with an IEP becomes 22 years old during their senior year of high school; Iowa allows that student to continue to complete their final year of high school under the IPE even though they are older than 21. The definition of a student with a disability is critical because it defines the population who can receive Pre-employment Transition Services.
* **Guidance**: Individuals who are in post-secondary academic programs and who are under the age of 22 are considered students with disabilities and as such are eligible for pre-employment transition services.Individuals who are in an academic program that provides a recognized credential of education may satisfy the term “in an educational setting” (e.g., a nursing program or CNA program) and therefore students in those programs would be considered a “student with a disability”. However, programs provided within an Employment Services Organization (such as Work Adjustment Training) or programs such as Project Search would not be considered an educational setting for the purposes of satisfying the definition of a student with a disability.

NOTE: A "student with a disability" who has been accepted into a post-secondary education program or institution and has graduated from high school is considered to be "enrolled in a recognized education program" and thus can still receive Pre-Employment Transition services during the summer between high school and college.

Additionally, some students with a disability may have graduated from their secondary education program, have been admitted or accepted into a post-secondary education program but have their start date delayed or deferred for various reasons creating a "gap year or semester". For those students who may be taking a “gap year or semester”, the VR counselor must ensure the following documentation has been received if Pre-Employment Transition services are to be provided:

1. Documentation that the individual with a disability graduated from secondary education;
2. Documentation that the individual with a disability has been accepted into a post-secondary education institution or program;
3. Documentation of the individual with a disability’s intention or confirmation that they had accepted the invitation to enter the post-secondary program;
4. Documentation that the individual with a disability has been informed by the institution that their “seat” or “spot” is being held for them.

The length of time of the gap is not an issue.  However, the VR counselor should ensure the individual continues to meet the definition of a student with a disability since they could potentially reach age 22 during the gap period.

## Difference between Student with a Disability and Youth with a Disability

This section explains the differences between a youth with a disability and a student with a disability and the services they may receive to help staff distinguish between these two populations.

### Youth with a disability

A youth with a disability is defined as an individual with a disability who is not younger than 14 years of age and not older than 24 years of age. They do not need to be enrolled in a secondary, postsecondary, or other recognized education program.

In order to receive services, a youth with a disability must be determined eligible for VR services. Once they have been determined eligible, youth with disabilities may have received all available VR services that they and their counselor determine appropriate, including transition services.

### Student with a disability

A student with a disability is defined as an individual with a disability in a secondary, postsecondary, or other recognized education program, who is between the ages of 14 and 21.

Students with a disability may receive pre-ETS as potentially eligible students, meaning they have not received an eligibility determination for VR services. If a student with a disability is determined eligible for VR services, they can receive pre-ETS, other transition services, and VR services as deemed appropriate by their counselor.

If a student with a disability is determined to be ineligible for VR services, they can no longer receive pre-ETS.

# Required Activities and Statewide Availability

The primary purpose of pre-ETS provided, purchased or coordinated by IDB is to help students begin to identify career interests and to learn skills in preparation for transition to employment and/or post-secondary education.

## Required Activities

Pre-ETS may be provided in a group or generalized classroom setting and/or individualized setting and are limited to any or all of the five services outlined below:

Job Exploration Counseling may include, but is not limited to:

* 1. Review of information regarding in-demand industry sectors and occupations, as well as non-traditional employment.
	2. Administration of vocational interest inventories and provision of local labor market information that applies to the student’s particular interests.
	3. Identification of career pathways of interest to the student.

Work-Based Learning Experiences may include opportunities that are available in school, after school, or outside of the traditional school setting; however, they must be provided in an integrated setting in the community to the maximum extent possible. IDB and community partners should seek every opportunity to provide WBLE in integrated settings before providing these services in non-integrated settings. Services may include, but are not limited to:

* 1. Coordinating a school-based program of job training and informational interviews to research employers.
	2. Worksite tours to learn about necessary job skills.
	3. Job shadowing.
	4. Mentoring opportunities.
	5. Onsite work-based experiences paid or unpaid (i.e., internships, volunteering, practicums, or service-learning opportunities).

Counseling on Opportunities for Enrollment in Comprehensive Transition or Post-Secondary Education Programs may include, but is not limited to:

* 1. Exploring the types of academic and occupational training needed to succeed in the workplace.
	2. Post-secondary opportunities associated with career fields or pathways.
	3. Self-advocacy skills for the purpose of identifying accommodations and services in an educational program as well as providing resources that may be used to support individual student success in education and training (i.e., disability support services).
	4. Advising students and parents or representatives on academic curricula and course offerings.
	5. Providing information about college application and admissions processes.
	6. Completing the Free Application for Federal Student Aid (FAFSA).

Workplace Readiness Training to develop social skills and independent living skills necessary for employment may include, but is not limited to:

* 1. Learning communication and interpersonal skills.
	2. Financial literacy, including benefits planning services.
	3. Orientation and mobility (O&M) skills to access workplace readiness training or work-based learning experiences.
	4. Job-seeking skills.
	5. Understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment.
	6. Onsite workplace readiness training during a work-based learning experience (WBLE).

Instruction in Self-Advocacy may include, but is not limited to:

* 1. Learning about student’s rights and responsibilities.
	2. Learning how to request accommodations, services, or supports.
	3. Mentoring with education staff (e.g., principals, nurses, teachers, or office staff).
	4. Peer mentoring with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings.
	5. Participating in youth leadership activities offered in educational or community settings.

Examples of Pre-Employment Transition Services

Examples of the five “required” activities and how they may be provided in either a group or individualized setting include, but are not limited to, the following:

1. General job exploration counseling may be provided in a classroom or community setting and include information regarding in-demand industry sectors and occupations, as well as non-traditional employment, labor market composition, administration of vocational interest inventories, and identification of career pathways of interest to the students. Job exploration counseling provided on an individual basis might be provided in school or the community and include discussion of the student’s vocational interest inventory results, in-demand occupations, career pathways, and local labor market information that applies to those interests.
2. Work-based learning experiences in a group setting may include coordinating a school-based program of job training and informational interviews to research employers, work-site tours to learn about necessary job skills, job shadowing, or mentoring opportunities in the community. Work-based learning experiences on an individual basis could include work experiences to explore the student’s area of interest through paid and unpaid work experiences, apprenticeships (not including pre-apprenticeships and Registered Apprenticeships), short-term employment, fellowships, or on-the-job trainings located in the community. These services are those that would be most beneficial to an individual in the early stages of employment exploration during the transition process from school to post-school activities, including employment. Should a student need more individualized services (e.g. job coaching, orientation and mobility training, travel expenses, uniforms or assistive technology), he or she needs to apply and be determined eligible for vocational rehabilitation services and develop and have an approved individualized plan for employment.
3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education in a group setting may include information on course offerings, career options, the types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with career fields or pathways. This information may also be provided on an individual basis and may include advising students and parents or representatives on academic curricula, college application and admissions processes, completing the Free Application for Federal Student Aid (FAFSA), and resources that may be used to support individual student success in education and training, which could include disability support services.
4. Workplace readiness training may include programming to develop social skills and independent living, such as communication and interpersonal skills, financial literacy, orientation and mobility skills, job-seeking skills, understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment. These services may include instruction, as well as opportunities to acquire and apply knowledge. These services may be provided in a generalized manner in a classroom setting or be tailored to an individual’s needs in a training program provided in an educational or community setting.
5. Instruction in self-advocacy in a group setting may include generalized classroom lessons in which students learn about their rights, responsibilities, and how to request accommodations or services and supports needed during the transition from secondary to postsecondary education and employment. During these lessons, students may share their thoughts, concerns, and needs, as they prepare for peer mentoring opportunities with individuals working in their area(s) of interest. Further individual opportunities may be arranged for students to conduct informational interviews or mentor with educational staff such as principals, nurses, teachers, or office staff; or they may mentor with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings. Students may also participate in youth leadership activities offered in educational or community settings.
* **Guidance**: It is permissible for the VR counselor to use the pre-employment transition services reserve fund to reimburse an employer for costs incurred to provide a work-based learning experience, such as a fee charged by the employer that might include the cost for the purchase of additional uniforms for a student, or **other costs incurred** **that are not individualized in nature but are necessary for the participation in the work-based learning experience**. For example, the VR counselor may use the reserve fund to purchase clothing (e.g., black slacks and white shirt) the student will require to participate in the work-based learning experience if that clothing is required for all employees. However, if the work-based learning experience **did not** **require** a uniform or specific clothing but the student lacked appropriate clothing to participate the student would need to be an open VR case under an IPE in order for the VR counselor to purchase clothing. This clothing can be purchased using the Pre-ETS reserve funds.

For questions regarding whether any specific group or individualized pre-employment transition services or other vocational rehabilitation services may be funded from the reserve funds please check with the Vocational Rehabilitation Program Administrator.

## Service Provision and Delivery

All pre-employment transition services provided to students with disabilities are governed by IDB policies and procedures and in accordance with state and federal laws and regulations. IDB will make every effort to ensure the Pre-ETS services are available statewide to students with disabilities, to include those students who are “potentially eligible” for vocational rehabilitation services. Pre-employment transition services are based on guardian consent to participate in pre-employment transition services. Students with disabilities are not exempt from any order of selection requirements for vocational rehabilitation services. A student with a disability who needs individualized VR services, in addition to Pre-ETS, must apply and be determined eligible for the VR program and have an approved IPE.

Role of the VR Counselor or assigned VR team member

The VR counselor or assigned VR team member is responsible for providing or coordinating pre-employment transition services for students with disabilities. This would include:

1. Working with assigned school systems (transition coordinators, teachers, etc.) to identify students with disabilities who are potentially eligible and students with disabilities who have applied or are VR eligible for whom pre-employment transition services may be appropriate; attending individualized education program meetings for students with disabilities, when invited.
2. Ensuring appropriate documentation has been provided to the VR counselor from school personnel identifying that the individual is a student with a disability; documenting within the CMS as required (see documentation section at end of this chapter);
3. Exploration of the individual needs of students with disabilities to determine the pre-employment transition services needed by the student, to include any specific accommodations or auxiliary services needed by the student to participate in pre-employment transition services.
4. Working with the local workforce development boards, one-stop centers, and employers to develop work-based learning experiences.
5. Consultation, staffing of cases of students with disabilities and overall case coordination with vendors who have been contracted to provide pre-employment transition services. Monitoring of those services being provided through meetings with students, parents, vendors, school personnel, receipt of progress reports, etc.
6. Work with assigned schools to coordinate the provision of pre-employment transition services to students with disabilities, both individually and within group settings.
7. Documenting the provision of pre-employment transition services in the CMS (see documentation section at end of this policy).
8. When invited, attend person-centered planning meetings for individuals receiving Social Security benefits.

Role of IDB team members (vocational rehabilitation teachers, rehabilitation technology specialists, independent living teachers, instructors, library staff, etc.)

The IDB VR counselor serving individuals with disabilities is responsible for the coordination of transition services. All transition services provided by IDB program staff must be documented by the VR counselor or assigned team member and included in the VR case file. IDB assigned staff may assist the VR counselor by (list is not exhaustive):

1. Serving as the transition referral point of contact
2. Disseminating information regarding VR services, including pre-employment transition services.
3. Making referrals to the VR counselor of potentially eligible students with disabilities for the purpose of accessing pre-employment transition services
4. Meeting with students and youth with disabilities, parents and school personnel to facilitate the involvement of the transition aged student in career development, vocational evaluation, and vocational preparation activities and curricula.
5. Working with VR counselors to develop and implement regionally conducted career related activities.
6. Encouraging students to participate in IDB Summer and Year-Round Programs.

## Setting in which Pre-ETS services are provided

The VR counselor or IDB staff may work directly with the student to provide services or may arrange for the provision of Pre-ETS to students through a contract or fee for services arrangement with another entity such as the LEA, a community rehabilitation provider (CRP), a university, or another vendor.

In providing pre-employment transition services, IDB may provide these services to students with disabilities in group settings, or on an individual basis For example, job exploration counseling provided in group settings may include the presentation of general local labor market composition and information, administration of vocational interest inventories, and instruction regarding self-advocacy and self-determination. On the other hand, job exploration counseling provided on an individual basis might include discussion of the student’s vocational interest inventory results and discussion of local labor market information that applies to those interests. The way pre-employment transition services are delivered (e.g., either in a group setting or on an individual basis) depends on the student’s informed choice.

If it’s determined that the student with a disability requires more intensive services (i.e., services that are beyond the limited scope of pre-employment transition services), the student would have to apply for and be determined eligible for VR services and develop an individualized plan for employment for the receipt of those services as would be true for any other applicant.

Students with disabilities may receive these services in a variety of settings, including classroom, employment, and community-based settings. However, services should be provided in integrated settings to the maximum extent possible to best prepare them for competitive integrated employment.

# Pre-Employment Transition Coordination Activities

Coordination activities are designed to support the successful delivery of Pre-ETS. IDB counselors, rehabilitation teachers managers and other staff will make every effort to develop and maintain cooperative relationships with State and local secondary education staff, post-secondary education staff, State-operated programs, and workforce development partners (i.e., Iowa*WORKS*) to coordinate activities that are essential for arranging and providing pre-employment transition services.

Coordination activities include:

1. Participating in Individualized Education Program (IEP) meetings for both eligible and potentially eligible students with disabilities. When invited, participation may be in person, by teleconference, or by videoconference, pending IDB representative availability. IDB staff will:
	1. Inform the student and their families during the intake interview of their available participation in IEP meetings as a member of the IEP team (parents must consent to attendance for minors, students who are no longer minors must consent to IDB attendance).
	2. Attend IEP meetings, as invited to address transition planning and coordination of Pre-ETS.
	3. Discuss processes for IEP invitations when conducting Coordination Activities with schools.
	4. Communicate with student’s special education teachers, transition personnel and/or teachers of the visually impaired as appropriate and with consent.
	5. Identify what Pre-ETS will support the student and compliment the services already provided by the school.
	6. In accordance with informed choice, discuss the continuum of VR services.
2. Attending person-centered planning meetings for students with disabilities receiving services under Title XIX of the Social Security Act, when invited. IDB will:
	1. Attend person-centered planning meetings, as invited, to address transition planning and Pre-ETS.
	2. Identify the contacts who coordinate services for students with disabilities.
	3. Reach out to discuss processes for being invited to person-centered planning meetings when appropriate.
	4. Identify how Pre-ETS can support the student’s goals.
	5. In accordance with informed choice, discuss the continuum of VR services.
3. Working with the local Iowa*WORKS* offices (American Job Centers), or other WIOA programs and employers to develop work-based learning experiences for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships (not including pre-apprenticeships and Registered Apprenticeships, short-term employment, fellowships, or on-the-job trainings located in the community. IDB staff will:
	1. Discuss collaborative options or coordinate joint work-based learning experiences for students with disabilities.
	2. Partner to develop and coordinate student participation in reverse job fairs and job fairs to help students identify and participate in work-based learning experiences.
4. Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services. IDB will:
	1. Work with local area school districts on the coordination and provision of Pre-ETS activities.
	2. Develop Pre-ETS activities for students with disabilities.
	3. Develop outreach letters and marketing materials.
	4. Develop a formal referral process and timeline to access students in the school setting.
	5. Coordinate opportunities to talk with families/parents.
	6. Attend career fairs, transition fairs and other meetings or events to discuss how pre-employment transition services are being provided and made available to students with disabilities.
	7. Work with educational agencies on determining providers/vendors that deliver these services in the school setting, when are the best times students can participate in services, determining what types of services are already being provided in the school under IDEA to identify what Pre-ETS are needed that would supplement and not duplicate services.
	8. Participate in local school planning to determine what services are being provided so IDB can determine what services are needed for students in individual school districts.

# Outreach and Collaboration with Education

## Collaboration with Education

Although IDB is responsible for providing or arranging for the provision of Pre-ETS, these services must be provided in collaboration with the Local Education Agency (LEA). In a **letter dated 8.31.2020**, The Office of Special Education and Rehabilitative Services (OSERS) recognized that effective partnerships between State VR agencies and LEAs (i.e., local schools), particularly on the provision of quality Pre-ETS and transition services, provide students with disabilities access to the opportunities needed for postsecondary education, training, and/or employment success.

1. **34 CFR §361.5(c)(51) -** Each State must ensure that the designated State unit, in collaboration with the LEAs involved, provide, or arrange for the provision of, Pre-ETS for all students with disabilities, as defined in § 361.5(c)(51), in need of such services, without regard to the type of disability (361.48(a))
2. **2. 34 CFR §361.22 - Coordination with education officials (a)(1)** - The vocational rehabilitation services portion of the Unified or Combined State Plan must contain plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities that are designed to facilitate the transition of students with disabilities from the receipt of educational services, including Pre-ETS, in school to the receipt of vocational rehabilitation services under the responsibility of the designated State agency.
3. **3. 34 CFR §361.22(a)(2)** - These plans, policies, and procedures in paragraph (a)(1) of this section must provide for the development and approval of an IPE as early as possible during the transition planning process and not later than the time a student with a disability determined to be eligible for vocational rehabilitation services leaves the school setting or, if the designated State unit is operating under an order of selection, before each eligible student with a disability able to be served under the order leaves the school setting.
4. **4. 34 CFR §361.22(b) – Formal interagency agreement** - The vocational rehabilitation services portion of the Unified or Combined State Plan must include information on a formal interagency agreement with the State educational agency.

LEAs are obligated to provide transition services under the Individuals with Disabilities Education Act (IDEA). They are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a free appropriate public education (FAPE), as required under IDEA.

1. Nothing under Title I of the Rehabilitation Act shall be construed as reducing a LEA’s obligation to provide the above-described services under IDEA (see Section 101(c) of the Rehabilitation Act and 34 C.F.R. §361.22(c) of the VR regulations).
2. Pre-employment transition services provided by VR agencies may not duplicate services that are already provided by local education agencies through the IDEA.
3. Decisions as to who will be responsible for providing services that are both special education services and vocational rehabilitation services must be made at the State and/or local level as part of this collaborative process and will be further defined in the formal interagency agreement. (**Link IDB’s MOU**)

## Coordination of the IPE and IEP or 504 Services

1. **34 CFR §361.45(d)(9)**- An IPE for a student with a disability is developed in consideration of the student’s IEP or 504 services, as applicable; and in accordance with the plans, policies, procedures, and terms of the interagency agreement required under §361.22.
2. **34 CFR §361.46 (d)** - Coordination of services for students with disabilities… states the individualized plan for employment for a student with a disability [IPE] must be coordinated with the individualized education program [IEP] or 504 services, as applicable, for that individual in terms of the goals, objectives, and services identified in the education program.

To develop an IEP with a student who needs transition services, the school invites the student, the student's parents/guardian, and a representative of any agency (with parental consent if the student is under age 18) likely to be responsible for providing, paying, or coordinating services. If the school invites a VR counselor to help develop an IEP, the VR counselor attends the meeting as a partner in the IEP planning process to discuss the need for transition services based on the student's specific needs, preferences, interests, and desired post-high school goals.

If a VR counselor is invited to participate in developing the IEP, and is unable to attend, the VR counselor needs to make every effort to:

1. Arrange another meeting prior to the IEP meeting, if possible; or
2. Make alternate arrangements such as a telephone conversation about potential services; or
3. Attend a general information session with the student and parent/guardian; or
4. Provide printed information about IDB services.

The school district's responsibility to provide special education services ends when the student graduates, reaches the age of 21 or drops out.

1. The school is responsible to ensure that graduation requirements are consistent with the student's education goals and the goals the student wants to achieve after high school.
2. Graduation requirements and post high school goals must be included in any discussion of transition services.

The VR counselor assists each student eligible for VR services to develop an IPE according to IPE development requirements. The employment goal on the student's IPE needs to align with the employment goal on the student's IEP be consistent with the student's strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

The vocational rehabilitation services on the IPE need to align with the student's employment goal and be coordinated with the standard educational goals and measurements on the IEP.

The VR counselor and school transition staff will collaborate regarding services for the student's employment goal.

## Resolving Payment Dispute

When payment disputes occur, the VR counselor negotiates with school staff in the best interests of the eligible IDB client/student. If after attempting to reach agreement about payment for services, the VR counselor and school staff are unable to agree, the VR counselor documents the following information in the program note of the case service record and forwards a copy to the VR program administrator including:

1. The regulation, policy, or requirement related to the dispute;
2. A description of the service or services needed;
3. How the service contributes to the employment goal on the IPE;
4. The reasons to support why IDB should not pay for the service;
5. The reasons to support why the school should pay for the service;
6. Actions taken to resolve the issue with the school; and
7. Other relevant information impacting the dispute.

The VR program administrator reviews and discusses the documentation with both the CFO and the Department of Education Transition Consultant to determine financial responsibility for the service under the and the Department of Education.

Outreach

Scope of Services provided (VR and School)

The VR counselor may provide pre-employment transition services to all eligible students with disabilities and those who are potentially eligible. Additionally, students and youths with disabilities may be provided necessary transition services, including those services under an Individualized Plan for Employment necessary to achieve the vocational goal.

However, throughout the transition period, both the school and the VR agency have responsibility for transition services. IDB has developed interagency agreements with the Department of Education that attempt to define responsibilities between IDB and the local school system. However, these agreements don’t always provide clear criteria as to which entity may bear responsibility for funding services. In those situations, the VR counselor should consult with the VR Program Administrator.

Informed Choice for potentially eligible students with disabilities

Potentially eligible students who are receiving pre-employment transition services but who have not applied for VR services, or who are in the process of applying must be given the opportunity to exercise their informed choice.

### Outreach to School Staff, Students and Parents/Guardians

Outreach to students and youth with disabilities, to include outreach to and engagement of parents (or, as appropriate, the representatives of the student or youth with disabilities) should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program eligibility requirements, application procedures, and scope of services that may be provided to eligible and potentially eligible students including but not limited to Pre-Employment Transition Services.

The range of outreach for Pre-ETS may include contact with public schools, private schools, alternative education programs, local transition teams, home-schooling, or other non-traditional education programs serving students ages 14 to 21 in the community.

Students with disabilities ages 14 to 21 in non-public and non-traditional school programs are provided outreach activities consistent with outreach provided to students in public schools.

The VR counselor contacts the school and introduces information about vocational rehabilitation services with school staff and associated programs. The VR counselor may distribute vocational rehabilitation marketing materials to schools including publications explaining VR services and programs. Information may include, but is not limited to the:

1. The potential benefits of Pre-ETS
2. Purpose of the VR program;
3. Confidentiality of information;
4. Referral Procedures;
5. Application procedures;
6. Eligibility requirements;
7. Scope of potential VR services that may be available;
8. Financial needs criteria; and
9. Vocational consultation for IEP meetings.

The VR counselor provides consultation about vocational rehabilitation in the development or review of a student's IEP if the student, the student's parents or guardian, the VR counselor and special education staff agree it is appropriate to the specific needs, preferences, interests, and desired post high school goals of the student. Early contact by the VR counselor with a student who has complex and multiple rehabilitation needs may assist the student with high school vocational experiences relevant to future services from IDB.

### Cooperative Relationships with High School or Alternative Education Program Staff

The VR counselor should develop relationships with high school or alternative education program staff and to agree on procedures with them to:

1. Identify students with disabilities who may be eligible to receive Pre-ETS and/or vocational rehabilitation services; and
2. Work cooperatively with them and the students identified as potentially eligible for VR services. Procedures for working cooperatively include timeframes for:
	1. Initiating student referrals to IDB;
	2. Providing comprehensive referral documentation;
	3. Conducting student assessments; and
	4. Following up with students identified as potentially eligible for VR services to make application
3. School staff and associated programs may include, but are not limited to:
	1. The high school 504 coordinator or school administrator;
	2. High school transition coordinator;
	3. Guidance counselors;
	4. School nursing staff;
	5. Special Education teaching staff;
	6. All other high school teachers and coordinators; and
	7. Alternative high school programs

Outreach is provided to special education students, 504 students and other individuals with disabilities who are not participating in special education. Examples of individuals with disabilities who are not in special education include the following:

1. Students with disabilities at risk of dropping out of school;
2. Youth with disabilities between 14-21 years old and not in school; and
3. Students with a disability who do not qualify for special education services
4. Homeless youth with disabilities

Parent groups, students, and parents/guardians the VR counselor may provide information to include, but are not limited to:

1. Parent-teacher associations;
2. Targeted parent organizations or groups;
3. Ninth grade students and their parents or guardians;
4. Students 14-16 years old and their parents or guardians;
5. Students who will exit school in 2 years and their parents or guardians. (These students need information to determine whether to apply for VR services while still in school.); and

## School Responsibilities

### 504 Students

Under Title 504 of the Rehabilitation Act, the school is responsible to provide and pay for reasonable accommodation for a 504 student to attend school and to access and participate in education and school activities.

**IEP Development and Annual Review**

The school is responsible for developing an Individual Education Program (IEP) with the student every year. The school ensures that the student’s IEP is consistent with the student’s graduation plan and requirements for graduation. The school may invite a VR counselor to the IEP meeting to provide vocational rehabilitation consultation depending on the specific needs, preferences, interests, and desired post-secondary goals of the student. The school must invite a representative of any agency likely to be responsible for providing, paying or coordinating with high school transition services. The IEP contains the student’s:

1. Standard educational goals and measurements;
2. Goals for anticipated post high school outcomes;
3. Services and activities they need to achieve the goals on the IEP; and
4. Service providers responsible to provide the education, activities and services including high school transition services they need to achieve the goals on the IEP. Service providers include, but are not limited to, the school, public organizations, and private for profit and non-profit community organizations.

At Age 14: Beginning no later than the first IEP to be in effect when the student turns fourteen, or younger if determined appropriate by the IEP team, and updated annually, thereafter, the IEP must include appropriate measurable post-secondary goals based on age-appropriate transition assessments related to training, education, employment and, where appropriate, independent living skills and must also include transition services including courses of study needed to assist the student in reaching those goals.

### Transition Services

The school is responsible to provide transition services which include activities that promote movement from school to post high school activities based on the student’s needs, preferences and interests. Some examples include, but are not limited to community experiences, daily living skills, and the development of employment and other post school adult living objectives. The school transition services are intended to increase the post high school performance of a special education student in the areas of:

1. Employment and/or enrollment of post secondary programs; and
2. Connection to appropriate out of school adult agencies.

Transition services customarily provided by a school may vary from school to school depending on the individual needs of the student

### High School Graduation Requirements

The school district is responsible to determine whether a student meets graduation requirements in coordination with the students IEP team. Graduation requirements for special education students include the following:

1. Regular high school graduation requirements established by the school district; or
2. Graduation requirements for students in special education are included in the IEP and are consistent with the transition services component of the IEP. Students served in special education cannot be denied the opportunity to earn a diploma solely because of a disability. Any accommodations, substitutions, exemptions or waivers of the regular graduation requirements necessary because of the student’s disabilities are determined through the IEP process and school district policies and procedures. The district has written policies and procedures for meeting the unique limitations of each student. Such procedures may provide for the extension of time the student remains in school up to and including the school year in which such student reaches 21 years of age, special accommodations that might include substitutions, exemptions or waivers determined by the IEP process.

# Referral Process for Pre-ETS

WIOA encourages a referral process for students and youth with disabilities to be simple and engaging, with the goal of not creating needlessly complex and prolonged procedures for applying for VR services. IDB may be contacted by a student, family member, medical professional, teacher or other school official, community rehabilitation providers (CRPs), state agencies, an advocate or other community providers to initiate a referral for Pre-ETS. Regardless of whether IDB or another party initiates the referral process, IDB is responsible for connecting the student with the right contact to help them engage in Pre-ETS services and/or VR services as efficiently as possible.

Prior to the provision of Pre-ETS for a potentially eligible student with a disability, it is necessary for IDB to obtain the following information:

1. A unique identifier (such as a social security number, when available).
2. Date of birth
3. Race (required if student is in elementary or secondary education).
4. Ethnicity (required if a student is in elementary or secondary education).
5. Student’s disability
6. Consent to allow IDB and school collaboration (if the student is a minor, the parent or guardian must consent, if the student is no longer a minor, they or their legal guardian must consent);

IDB uses the Pre-ETS Information and Consent Release (insert link) to collect this information. It may be submitted by the student, school personnel, family members, guardians, or other interested persons. IDB staff should establish a referral process with school personnel to the extent possible to ensure that this form is completed. Once the form has been submitted to IDB, IDB staff must also verify that the student referred for Pre-ETS meets the definition of a “Student with a Disability” and ensure supporting documentation is in the case record.

1. IDB staff signature on the Pre-ETS Agreement (insert link) indicates approval of the student for services, as this is a nondelegable action. Contractors and other partners cannot approve students for services. Students should not receive services until IDB staff have signed this form.
2. Supporting documentation may include:
	1. Case notes documenting counselor observations, review of school records, statements of education staff, and/or students; or
	2. Copy of an individualized education program (IEP) document, SSA beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination or documentation relating to 504 accommodation(s); or
	3. Medical or psychological documentation signed by an appropriately licensed professional.
3. Pre-ETS students have the same Informed Choice and Appeal and Complaint rights as applicants. Students and families need to be provided with the Client Rights and Responsibilities brochure and Client Assistance Program (CAP) information prior to receiving services.
4. When a potentially eligible individual requires additional VR services to participate in pre-employment transition services, they must apply, be found eligible and develop a plan for employment to include those required services.
5. If a student is interested in receiving VR services, IDB staff should support them in completing the IDB Application for VR services.

# Providing Pre-ETS

## Services for Potentially Eligible Students

A potentially eligible student with a disability may not receive any VR services other than Pre-ETS until they apply, and are determined eligible for VR services, and have an approved IPE.

1. Five Required Pre-employment Transition Services
	1. Job exploration counseling
	2. Work-based learning experiences
	3. Counseling on opportunities for enrollment in higher education
	4. Workplace readiness training
	5. Self-advocacy
2. Auxiliary aids and services
	1. Auxiliary aids and services needed by a student with a sensory or communicative disability to access or participate in any of the preemployment transition services, if no other public entity is required to provide such aids or services.
	2. For example, for a potentially eligible student who is DeafBlind, IDB could purchase interpreter services or video-based telecommunication products to ensure access to information and activities related to job exploration counseling or other pre-employment transition services.

## Services for Eligible Student with a Disability

Eligible students with disabilities, in accordance with an approved IPE, may receive pre-employment transition services, auxiliary aides and services, and any additional VR services that may be needed in order to benefit from Pre-ETS.

1. Five Required Pre-employment Transition Services
	1. Job exploration counseling
	2. Work-based learning experiences
	3. Counseling on opportunities for enrollment in higher education
	4. Workplace readiness training
	5. Self-advocacy
2. Auxiliary aids and services
	1. Auxiliary aids and services needed by a student with a sensory or communicative disability to access or participate in any of the preemployment transition services, if no other public entity is required to provide such aids or services.
3. Additional VR services to benefit from pre-employment transition services
	1. VR services necessary to participate in Pre-ETS may be provided to VReligible students under an IPE and charged to the funds reserved for the provision of Pre-ETS.
	2. In accordance with the Notice of Interpretation (NOI)-published 2.28.2020, and subsequent Final Regulations Issued 3.21.2022, additional VR services needed by eligible students with disabilities may be paid for with Federal VR grant funds reserved for the provision of Pre-ETS. Receiving these additional VR services and supports, along with Pre-ETS, enables eligible students to develop the skills to experience competitive, integrated employment as they leave school and enter the workforce.
	3. The circumstances under which Pre-ETS funds may be used to pay for those additional VR services include the following:
		1. These services must be provided in accordance with an approved IPE, for an eligible student with a disability, and
		2. Must be needed by the student in order to benefit from one or more of the five required Pre-ETS activities.
	4. Other VR services that may be needed by an eligible student with a disability in order to benefit from Pre-ETS in accordance with their IPE, and therefore allowable to be charged to the Pre-ETS reserve funds, may include:
		1. Assessment Services
		2. Maintenance
		3. Transportation
		4. Personal Assistance Services
		5. Rehabilitation Teaching and O & M
		6. Family Services – In some situations, a family member may require a service to enable the eligible student with a disability (eligible student) to benefit from Pre-ETS. For Example, the parent may need transportation services to accompany the eligible student to a PreETS activity or the parent may need language interpreter services in order to understand consent forms that the parent may need to sign on behalf of the underage eligible student participating in a Pre-ETS activity.
		7. Coaching Services –assist the eligible student to perform the tasks assigned during work-based learning experience.
	5. Examples of VR services that would not count include job placement, job search assistance and supported employment which are all examples of either transition-related or employment related services, which by their very nature are beyond the nature, scope, and purpose of Pre-ETS.
4. In order for a student to continue to receive Pre-ETS services in the period in between when they graduate high school and when they start post-secondary education, the following documentation is needed:
	1. Documentation that the individual with a disability graduated from secondary education;
	2. Documentation that the individual with a disability has been accepted into a post-secondary ed. institution/program;
	3. Documentation of the individual with a disability intention or confirmation that they had accepted the invitation to enter the post-secondary program; and
	4. Documentation that the individual with a disability has been informed by the institution that their “seat” or “spot” is being held for them.
* Note: For the purposes of enrollments for Credential Attainment (which cannot be recorded for potentially eligible students), enrollment in a post-secondary program should only be recorded on the first day the student attended classes.
1. Search for Comparable Services and Benefits
	1. IDB must conduct a search for comparable services and benefits only when providing VR services to eligible students, not when providing Pre-ETS to potentially eligible students
	2. Rehabilitation technology, including telecommunications, sensory, and other technological aids and devices, among other VR services, are exempt under Section 101(a)(8)(A)(i) and 34 CFR 361.53(b)(5) from the determination of comparable services and benefits. Therefore, IDB need not conduct a search for comparable services and benefits when providing auxiliary aids and services to either eligible or potentially eligible students with disabilities to the extent that these aids and services constitute ‘‘rehabilitation technology’’ as defined in Section 7(32) of the Rehabilitation Act and 34 CFR 361.5(c)(45), and are necessary for the student with a disability to participate in pre-employment transition services under section 113 of the Rehabilitation Act.

Pre-ETS and Order of Selection (OOS)

All students and youth with disabilities who apply for vocational rehabilitation services, even if they are still receiving pre-employment transition services, will be subject to all relevant requirements for eligibility, order of selection, and development of the individualized plan for employment (including its development prior to leaving school). That is, if a student is determined eligible for VR services and assigned to a closed category the VR counselor could not develop an IPE for that student.

Transition services for groups to students and youth can be provided even if an individual receiving services within the group has been determined eligible and assigned to a closed priority. These services should be basic generalized services (i.e., group tours of universities and vocational training programs, employer or business site visits to learn about career opportunities, career fairs coordinated with workforce development and employers to facilitate mock interviews and resume writing, and other general services).

If a student with a disability is determined eligible for VR services and under OOS their assigned priority category is closed, pre-employment transition services may continue if any or all of the 5 required services had already begun prior to being determined eligible. Specifically, the student is eligible to continue to receive the pre-employment transition service (or services) that had begun and the VR counselor may also initiate any of the other 5 required services even if the service is initiated after the student has been placed in the closed category. The VR counselor cannot provide any other vocational rehabilitation services for those students assigned to closed priority categories.

Should a student with a disability who is receiving pre-employment transition services no longer meet that definition (i.e., age out, leave school, etc.) and if they have been determined eligible and have been assigned to a closed category than pre-employment transition services should be discontinued. No other vocational rehabilitation services can be provided until their category becomes open to be served.

**Guidance**: Transition services can be provided to any student or youth with a disability, regardless of whether they have been determined eligible for services and regardless of whether they may be in a closed category under Order of Selection (OOS). As noted above, however, these are generalized and basic services, not targeted individualized services as one would have under an IPE.

Students who are receiving pre-employment transition services must have any or all of the 5 required pre-employment transition services continued to completion if and when they are determined eligible for VR services and assigned to a closed category under OOS. This is true even if only one required service was begun prior to assignment in the OOS category; the student is still eligible to receive any or all of the remaining pre-employment transition services until completion. However, a student with a disability is not exempt from the relevant OOS policies otherwise and so if they are assigned to a closed category their IPE cannot be developed and no individualized VR services can be provided. Additionally, should a student be determined eligible and assigned to a priority category (and pre-employment transition services have not yet been initiated) then those services cannot be provided.

# Provision of Reasonable Accommodation, Auxiliary Aids and Services

## Access to Pre-Employment Transition Services

Auxiliary aids and services (including assessment for such aids or services) needed by a student with a disability (served under an IPE or as potentially eligible) to access or participate in pre-employment transition services constitute allowable pre-employment transition services expenditures and, therefore, may be paid with the funds reserved for that purpose.

IDB must ensure that no qualified individual with a disability is excluded from participation in or be denied the benefits of services, programs, or activities based on the individual’s disability. Therefore, if a student with a disability requires a reasonable accommodation or auxiliary aid or service to access or participate in any of the required pre-employment transition services, IDB may pay for such costs if no other public entity is required to provide such aid or service.

Reasonable Accommodation/Auxiliary Aids and Services includes but are not limited to:

1. Accessible electronic and information technology
2. Acquisition or modification of equipment or devices; and other similar services and actions.
3. Assistive listening devices
4. Assistive listening systems
5. Assistive Technology (AT) assessment to determine whether modified equipment or devices are needed for a student to participate in pre-employment transition services.
6. Audio recordings
7. Braille materials and displays
8. Closed caption decoders
9. Communication boards
10. Exchange of written notes
11. Large print materials
12. Magnification software
13. Note takers
14. Open and closed captioning, including real-time captioning
15. Optical Recognition Software and devices
16. Other effective methods of making visually delivered materials available to individuals who are blind, deafblind or have low vision
17. Qualified interpreters (this does not include foreign language interpreters) on-site or through video remote interpreting (VRI) services
18. Qualified readers
19. Real-time computer-aided transcription services
20. Screen reader software
21. Secondary auditory programs (SAP)
22. Speech synthesizers
23. Support Service Provider (SSP for students who are deaf-blind)
24. Telephone handset amplifiers
25. Telephones compatible with hearing aids
26. TTY
27. Videotext displays
28. Voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices
29. Other effective methods of making aurally delivered information available to individuals who are deaf or hard of hearing;
30. Non-adapted or adapted equipment or devices, when needed for a student during participation in pre-employment transition services. IDB will retain ownership of the equipment or device and require its return at the conclusion of the service for which it was provided, so that it may be available for use by other students participating in pre-employment transition services.

Auxiliary aids and services do not include:

1. Personal devices (e.g., computers, laptops, tablets, etc.)
2. Prescribed devices (e.g., eyeglasses, hearing aids, wheelchairs)
3. Readers for personal use or study
4. Attendant Care or other services of a personal nature
5. Home or vehicle modifications.

Pre-ETS funds may not be used to modify a student’s personal equipment or devices, or to provide personal equipment or devices of which students would retain ownership.

If a student with a disability requires certain VR services not constituting pre-employment transition services or auxiliary aids but are necessary for a student to access or participate in pre-employment transition services, the VR counselor must determine whether or not the student meets the eligibility criteria for VR services and, if so, must develop an individualized plan for employment (IPE) in order to provide those additional services. These necessary services may be paid with funds reserved for the provision of pre-employment transition services and are listed below.

* Assessment Services
* Counseling and Guidance
* Referral Services
* Maintenance
* Transportation
* Personal Assistance Services
* Rehabilitation Teaching & Orientation and Mobility Services
* Rehabilitation Technology
* Family Services
* Coaching Services

### Vocational Rehabilitation Technology Services:

Assistive technology assessments to determine whether modified equipment or devices are needed for a student to participate in Pre-ETS can be provided but this assessment is not considered Pre-ETS. Assistive technology training may be provided, but this training is not considered a Pre-ETS. Therefore, if a student has a potentially eligible program, the training cannot be provided. If a student’s individualized education program does not include training on the use of assistive technology, it may be best for this student to apply for vocational rehabilitation services.

Examples of Auxiliary Aids and Other Accommodations and Services

1. Screen reading software programs could be purchased to enable an individual who is blind to access information on a computer during a work-based learning experience.
* It is important to note that the screen reader software for individuals who are blind and not the computer for which it is installed meets the definition of “auxiliary aids and services” for purposes of the ADA and section 504 of the Rehabilitation Act and, as such, could be paid with funds reserved for the provision of pre-employment transition services.
1. For an individual who has low vision and is deaf, interpreter services or video-based telecommunication products could be purchased to ensure access to information in activities related to job exploration counseling or other pre-employment transition services.
2. If the student requires a “disability related service” in order to access a required pre-employment transition service (Pre-ETS), that service may be funded using the reserved Pre-ETS funds. For example, the cost of travel training or O & M services that are required to allow the student to participate in a Work-Based Learning Experience could be done using Pre-ETS funds.
3. If an eligible student requires transportation costs (such as a taxi cab) or maintenance (such as a uniform) to participate in Pre-ETS this may be provided under an approved IPE and allocated to the reserved Pre-ETS funds. Similarly, electronic devices including rehabilitation technology that does not meet the definition of an auxiliary aid, could be provided and paid out of Pre-ETS funds if that services was necessary to participate in Pre-ETS. Another example is if an eligible student requires coaching services to participate in work-based learning experiences this service could be funded with Pre-ETS funds.

## Provision of Other Necessary Support Services

Funding of services needed shall be determined in collaboration with the local school system and other resources.

1. PE Program Type – When a student requires a personal device to participate in services, IDB may loan the device, contingent on availability. This loan will be documented in the students Pre-ETS Agreement, and the student will be required to return the device when no longer required for participation in services.
2. VR Program Type – When a student has an Individualized Plan for Employment (IPE) and requires a personal device or other goods and services to participate in any of the five required Pre-ETS, they may be purchased using traditional VR funding, consistent with the approved IPE. IDB may also loan the device, if available.

## When do Pre-ETS End?

1. For Eligible Students
	1. Pre-ETS services are no longer provided to eligible students under an IPE when:
		1. They no longer meet the definition of a student with a disability. They will continue to receive any additional individualized VR services they need as outlined on their IPE.
		2. They have completed all pre-ETS they need. They will continue to receive any additional individualized VR services they may need as outlined on their IPE.
	2. For Potentially Eligible Students
		1. Pre-ETS services are no longer provided to potentially eligible students when they no longer meet the definition of a student with a disability.
			1. Even if a student achieves the objectives and outcomes intended in receipt of pre-ETS and is no longer communicating a need of additional pre-ETS services, they continue to be reported as a student with a disability in the RSA 911 until they no longer meet the definition of a student with a disability as they can return for services at any time so long as they meet the definition of a “student with a disability.” They can also decide to apply for VR services and receive pre-ETS and/or additional individualized VR services under an IPE.

# VR Process (Transition)

## Referral for VR Services

While an individual may be referred for vocational rehabilitation services from a number of different sources (as noted above), IDB’s staff may provide consultation, technical assistance, and training for families, early intervention staff, and public school staff who teach blind infants and children who are blind, deafblind or have low vision. They are responsible for collaborating and coordinating with the local school systems to assist students who are blind, deafblind or have low vision participate equitably in school and begin to prepare for employment. As such, they are typically involved with the vast majority of students and youth who may be eligible for and benefit from the agency’s vocational rehabilitation program.

IDB staff are responsible for contacting student’s families and providing them with information regarding IDB’s vocational rehabilitation program, including Pre-Employment Transition Services. Should the family be interested in gathering more information regarding VR services and/or having the student apply for services, the IDB staff will provide necessary contact information to support staff within five (5) working days. The support staff will then implement the referral process. Should the VR counselor or other IDB staff be contacted by a Teacher of the Visually Impaired or other school personnel, families, other public or private agencies or programs regarding a student or youth with a disability they will implement the referral process. (Referral Policy link to be added)

## Application for VR Services

A student or a youth is considered to have submitted an application when the individual, or as appropriate, the individual's parent, family member, guardian, advocate, or authorized representative, has signed an agency Application Release for Services form, has submitted a signed, written request for services, or has otherwise requested services and has provided information necessary to initiate an assessment for determining eligibility and priority of services, and the individual is available to complete the assessment process.  (Application Policy link to be added)

## Eligibility Determination

The eligibility criteria and determination process for students in transition is the same as any other potential individual (Eligibility Policy link to be added).

## IPE Development and Service Provision

For students and youth with disabilities who are under an Individualized Education Program (IEP) the VR counselor should review the individual’s IEP to ensure IEP transition goals and services related to school to post-secondary goals are contained within the IPE. Both IDB planned services as well as school provided services that are necessary to achieve the vocational goal should be included on the IPE.

The individualized plan for employment should be consistent with the individual’s unique strengths, resources, priorities, concerns, abilities, capabilities, career interest, and informed choice consistent with the general goal of competitive integrated employment (**except that in the case of an eligible individual who is a student or a youth with a disability, the description may be a description of the individual’s projected post-school employment outcome**).

The plan for employment with a projected post-school employment outcome should include the specific transition services, to include pre-employment transition services if needed by the student and supports needed to achieve the student’s employment outcome or projected post-school employment outcome. As such, the plan should outline the services and activities that will guide the individual’s career exploration. The projected post-school employment outcome facilitates the individual’s exploration and identification of a vocational goal based upon his or her informed choice. It may be a specific goal, such as a Web designer, or a broader goal, such as medical practitioner. The projected post-school employment goal may be amended during the career development process and should be amended to a specific vocational as soon as the student/youth is ready and prior to the student turning age 24.

Note: For students with disabilities who are receiving pre-employment transition services (Pre-ETS) prior to a determination of eligibility for VR services, once the student is determined eligible and an IPE is developed any pre-employment transition services they are receiving as well as any planned Pre-ETS services should be included on their IPE.

**Guidance**: By permitting the individualized plan for employment for a student or youth with a disability to include a projected, or generally described, rather than a specific employment goal, it’s recognized that some students and youth with disabilities, particularly those of a younger age, may not have formulated a specific employment goal when they begin the VR process. As a result, the VR counselor may find it necessary to amend the individualized plan for employment to reflect career exploration consistent with vocational growth and development and the resulting evolution in the student’s or youth’s employment goal.

**Guidance**: For students and youth with disabilities, many will have little or no viable work history. While the VR counselor must consider the individual’s career interests and informed choice, it’s equally important to determine the degree to which those interests coincide with the individual’s strengths, resources, capabilities and so on. For students in particular, counseling and guidance should be provided towards the development of a viable vocational goal that recognizes, even with post-secondary education or training, that their entry into employment will likely be at the entry level for their chosen occupation and in some cases entry-level employment of any kind may be the most appropriate first step. Pre-employment transition services, including a work-based learning experience, can be a valuable asset in assisting the student and the VR counselor in determining an appropriate vocational goal.

Federal regulations require that development and approval of an IPE must be completed as early as possible during the transition process (within 90 days of eligibility determination) or by the time each student or youth determined to be eligible for vocational rehabilitation services leaves the school setting (if that’s less than 90 days) or, if IDB is operating under an order of selection, before each eligible student able to be served under the order leaves the school setting. The IPE for students and youth with a disability who are receiving education services shall be developed in consideration of the student’s Individualized Education Plan (IEP) and in accordance with the plans, policies, procedures, and terms of the interagency agreement between IDB and the Iowa Department of Education designed to facilitate the transition of students who are blind deafblind or have low vision from school to the receipt of vocational rehabilitation services. VR counselors, students, parents, and local education authorities will work collaboratively to ensure that the student’s vocational and educational goals are consistent. The VR counselor has the primary responsibility of obtaining a copy of the IEP from the student’s parents and/or the school system.

VR counselors or assigned IDB staff will attend IEP meetings for students who are blind, deafblind or have low vision when invited. Assigned IDB staff are responsible for establishing contact with students, parents, and the local school system to determine when IEP meetings are occurring. In some situations, VR counselors will be able to coordinate IPE development and annual reviews around IEP meetings.

Service provision including purchase of goods and services for eligible students in transition follow the same policies and procedures as any other eligible individuals.

### Assistive Technology

Students and youth with disabilities for whom assistive technology has been identified as necessary for them to participate in post-secondary vocational training, education or in employment will need to have the assistive technology provided prior to graduation in order that they have enough time to become proficient in the use of the assistive technology prior to the commencement of the training or school or prior to beginning employment. The VR counselor should ensure the IPE is developed no later than the fall of the student’s senior year or, if possible, prior to the end of their junior year such that the identified assistive technology can be ordered at that time.

### Supported Employment, Extended Services and Youths with Disabilities

Transition-aged students and youth who meet the criteria for supported employment (SE) services may receive these services as identified on the IPE. IDB will coordinate SE services with the student, their parents as required, and the school system in which the student is enrolled as needed.

The definition of “extended services” specifies that IDB may provide extended services only to “youth with the most significant disabilities” for a period not to exceed four years or until such time as a youth reaches the age of 25 and no longer meets the definition of a “youth with a disability.

Extended services means ongoing support services and other appropriate services that are—

(i) Needed to support and maintain an individual with a most significant disability including a youth with a most significant disability, in supported employment;

(ii) Organized or made available, singly or in combination, in such a way as to assist an eligible individual in maintaining supported employment;

(iii) Based on the needs of an eligible individual, as specified in an individualized plan for employment;

(iv) Provided by a State agency, a private nonprofit organization, employer, or any other appropriate resource, after an individual has made the transition from support from the designated State unit; and

(v) Provided to a youth with a most significant disability by the designated State unit for a period not to exceed four years, or at such time that a youth reaches age 25 and no longer meets the definition of a youth with a disability, whichever occurs first. The designated State unit may not provide extended services to an individual with a most significant disability who is not a youth with a most significant disability.

In no case may the VR counselor provide more than four years of extended services. Also, once a youth with the most significant disabilities reaches 25 years of age, he or she no longer meets the definition of “youth with a disability” and the VR counselor must discontinue funding extended services and prior to that point the counselor must identify another source of extended services to ensure that there will be no interruption of service.

**Guidance**: The VR counselor is required to identify who will be providing extended services on the IPE when supported employment services are being provided. Funding for these services may come through waiver services or other sources including Medicaid, or other public or private funding sources. Should no funding source be available for an individual being served through SE services, IDB can use their VR funds (different than their extended services state funds) to provide extended services to a youth with a disability for up to 4 years or until they reach age 25. However, given extended services funding is typically available, the VR counselor must seek approval from the VR Program Administrator prior to authorizing for these services from VR funds. See the Supported Employment chapter for more information regarding extended and ongoing support services.

# Documentation of Transition Services (including the provision of Pre-ETS)

1. Prior to providing students with disabilities pre-employment transition services (potentially eligible) the VR counselor should ensure documentation that the individual is a student with a disability. Documentation could include:
	1. Copy of Student’s IEP
	2. SSA Award letter
	3. Medical report documenting disability
	4. Progress note in CMS indicating they had reviewed the student’s school record indicating the individual is a student with a disability; noting a staffing with school personnel indicating a disability; counselor observation of the disability, etc.
	5. Other documentation of the student’s disability (e.g., documentation of a diagnosis or disability determination or documentation relating to 504 accommodation)
2. Transition services and activities, including pre-employment transition services, for students and youth with disabilities must be documented in the CMS. Documentation requirements for pre-employment transition services include:
	1. Date of Birth
	2. Race
	3. Start date of Pre-ETS
	4. Pre-employment transition services provided
	5. Expenditures
	6. Documentation that the individual is a Student with a Disability (see No. 4 below)
3. The VR counselor must ensure they are choosing the correct service in the CMS when providing pre-employment transition services. If unsure about whether or not a service to an individual should be coded as pre-employment transition services consult with the program administrator.
4. Students with disabilities who have not applied for VR services (potentially eligible) but who are receiving pre-employment transition services must be entered in the potentially eligible program in the CMS to ensure they are documented as recipients of pre-employment transition services. (refer to CMS Guidance)

NOTE: Although much less documentation is required with respect to students with disabilities who are receiving pre-employment transition services prior to applying or being determined eligible for VR services (potentially eligible), some basic documentation is necessary to ensure that:

1. these students indeed have a disability and, thus, are "potentially eligible" for VR services; and
2. IDB has sufficient information necessary to complete required RSA reporting and satisfy performance accountability requirements under WIOA. To that end, the data elements required for a “potentially eligible” student with a disability includes: a social security number (if available), date of birth, race (required if student is in elementary or secondary education), ethnicity (required if student is in elementary or secondary education), student's disability, start date of pre-employment transition services and the pre-employment transition services provided, including the type of provider and amount expended for the service. The verifying documentation must be maintained in the individual’s case file.

## Documenting the Provision of Pre-Employment Transition Services

IDB is required to make pre-employment transition services (Pre-ETS) available statewide to all students with disabilities who may need such services, including students with disabilities who have applied for VR services as well as potentially eligible students (PE). IDB staff will document the direct provision of Pre-ETS as a Services Verified note in CMS, including those Pre-employment transition services provided to individuals who are being served as Potentially Eligible. IDB staff must begin to provide at least one (1) required Pre-employment transition service for any student with a disability who is being served as Potentially Eligible (PE).

Coordination, case management, scheduling, and other services related to Pre-ETS but not the direct provision of a Pre-ETS service will be documented as a general program note in CMS.

The counselor must document the provision of Pre-ETS to clients in CMS in the following manner:

1. **Students with Disabilities being served under an IPE:** Documentation requirements for Pre-ETS is the same as for any other service. That is, Pre-ETS services should be included on the IPE with estimated start dates and then documented as they occur. Pre-ETS services that were planned but not provided would be documented consistent with the CMS guidance regarding other VR services.
2. **Potentially Eligible (PE) & Open in VR with no IPE**: Pre-ETS services that are provided must be documented in CMS consistent with guidance for other services. However, because the individual is not under an IPE, there will be no estimated start dates for the pre-employment transition service. Therefore, if the counselor has planned to provide a pre-employment transition service but the service did not occur, documentation would as a general note in the CMS.

For all students with a disability who are in plan status, the VR counselor will include at least one of the five required pre-employment transition services on the individual’s IPE and will begin to provide one or more Pre-ETS within the plan’s time frame. Additional Pre-ETS will only be added to the IPE when it’s clear that the service(s) will actually be provided within the planned dates on the IPE (usually no more than 1 year).

In some cases the VR counselor (or another IDB staff) may provide more than one Pre-ETS during a G & C meeting or during the provision of other services. For example, the counselor may engage in discussion with the student about self-advocacy during the same session they are discussing post-secondary options. The counselor should create a services verified note for both self-advocacy and post-secondary options and summarize the services accordingly.

The VR counselor does not need to document any Pre-ETS that was not actually provided during any given quarter. Additionally, the counselor must not create a services verified program note for any planned in-house Pre-ETS service until it’s certain the service will be provided or is already being provided in the quarter.

Pre-ETS provided by a vendor must not be documented as a services verified program note by the counselor until the service has been provided. However, Pre-ETS provided directly to the individual by the VR counselor regarding the vended service must be documented as a Pre-ETS service in CMS.

For example, a student is working with Company A on finding a work based learning opportunity. The student expresses some anxiety regarding this and the VR counselor meets with the student. Since the counselor is directly providing guidance and counseling services regarding a work-based learning experience, this will be documented as a Services Verified program note as in-house Pre-ETS versus VR counseling and guidance.

## Documentation of Coordination of Pre-ETS Services

There is likely to be necessary arrangement and coordination services regarding Pre-ETS. For example, a referral to Company A for Pre-ETS, meetings and/or emails with the student for scheduling purposes, etc. These coordinating activities should be documented in the Program Notes as a General Note in CMS since they are not direct services provided to the student by the VR counselor or by other IDB staff.

The VR counselor may be primarily coordinating the service but could also be providing a direct Pre-ETS. For example, the counselor has a discussion with the student about a referral to Company A for Pre-ETS services, explaining the services they would provide, addressing any concerns, questions or issues the student expresses. While this discussion is about Pre-ETS, the counselor is not actually providing Pre-ETS so should be documented in the Program Notes as a General Note rather than as a Services Verified Note.

However, if the session included more specific guidance and counseling (e.g., counseling regarding the type of work environment the student would prefer, work activities they are interested in, etc.), this should be documented as a Services Verified note as a Pre-ETS work-based learning experience. As a reminder, the counselor is not documenting Pre-ETS provided by Company A until a report is provided; those services are then documented as a Services Verified Note in the CMS as provided by a contracted program. ; only those Pre-ETS services provided directly by the VR counselor or by other IDB staff.

# Reservation of Funds

 At least 15 percent of the Federal allotment must be reserved to provide or arrange for the provision of pre-employment transition services for students with disabilities. This is a state requirement and requires coordination between IDB and IVRS.

Pre-employment transition services include a specific set of activities under section 113 of the Rehabilitation Act and 34 C.F.R. 361.48(a), which may be charged to the minimum 15 percent minimum reserve:

1. “Required” activities (section 113(b) of the Act and §361.48(a)(2));
2. “Pre-employment transition coordination” activities (section 113(d) of the Act and §361.48(a)(4)); and
3. “Authorized” activities (section 113(c) of the Act and§361.48(a)(3)).

VR must make available statewide the “required activities” to all students with disabilities who may need such services and must carry out the “coordination activities”.

VR must ensure sufficient funds are available to provide the required and coordination activities before engaging in the “authorized activities” using the fiscal forecasting process.

## Fiscal Forecasting

For purposes of determining compliance with the percentage of funds required to be reserved for pre-employment transition services, IDB must monito expenditures throughout the lifecycle of the VR grant award since 15 percent reserve is not a fixed number and may fluctuate based on the state’s ability to meet its VR award funds, maintenance of effort penalties, and participation in reallotment.

None of the funds reserved for Pre-ETS may be used to pay for administrative costs. These funds must be used solely for the provision of Pre-ETS. IDB must provide the “required” pre-ETS activities to students with disabilities. Additionally, IDB must carry out pre-ETS “coordination” activities. IDB may provide “authorized” activities if reserved funds remain after students with disabilities have received the pre-ETS “required” and “coordination activities. This means that IDB must use the entire amount reserved for the provision of pre-ETS. However, there is no requirement that IDB wait until all students with disabilities have received required and pre-employment transition coordination activities. IDB must ensure sufficient funds are available to provide the required and pre-ETS coordination activities, consistent with the determination of available funding for authorized services, before spending reserved funds on authorized activities.

The Leadership Team will use the below steps to determine and complete the fiscal forecasting process. Steps to determine and complete the fiscal forecasting process includes:

1. Determine the number of “students” with disabilities in the State which includes those students eligible for the VR program as well as those students with disabilities “potentially eligible for the VR program.
2. Ensure all students with disabilities and their families are made aware of the availability of pre-employment transition services to determine the number of students in the State that need pre-ETS required and coordination activities.
3. Calculation of the cost for the provision of the pre-ETS required and coordination activities.
4. Calculation of the amount of funds that must be set aside and reserved for the provision of the “pre-ETS required” activities to students with disabilities in need of such services, as well as the costs for providing pre-employment transition coordination activities.
5. Calculate whether IDB’s VR funds that are required to be reserved for the provision of pre-ETS are sufficient to make the required and coordination activities available to all students with disabilities in need of such services.
	1. Review carry-over circumstances in accordance with this calculation.
6. Update and/or revise the reserve funds calculations at least annually and revisit quarterly as additional data is available.
7. Document and maintain information and data used in the determination of the fiscal forecasting document.

# Pre-Employment Transition Services (Authorized Activities)

If funds are available and remain after the provision of the required activities (from the 15% required reserve allotment for pre-employment transition services), IDB’s leadership team will identify the **authorized services** to be provided. These services are for the purpose of improving the transition of students with disabilities from school to postsecondary education or an employment outcome and may include:

1. implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces.
2. Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently, participate in postsecondary educational experiences, and obtain and retain competitive integrated employment;
3. Providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities;
4. Disseminating information about innovative, effective, and efficient approaches to achieve the goals of this section;
5. Coordinating activities with transition services provided by local educational agencies under the Individuals With Disabilities Education Act (20 U.S.C. 1400 et seq.);
6. Applying evidence-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to better achieve the goals of this section;
7. Developing model transition demonstration projects;
8. Establishing or supporting multistate or regional partnerships involving states, local educational agencies, designated state units, developmental disabilities agencies, private businesses, or other participants to achieve the goal of this section; and
9. Disseminating information and strategies to improve the transition to postsecondary activities of individuals who are members of traditionally un-served populations.