

Chapter 14: Pre-Employment Transition Services

Vermont Division for the Blind and Visually Impaired
Policy and Procedures Manual

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Section I. Definitions

- A. **“Pre-Employment Transition Services (Pre-ETS)”** are a range of required and authorized activities focused on students with disabilities under an amendment to the Rehabilitation Act of 1973, entitled the Workforce Innovation and Opportunity Act of 2014 (WIOA). Pre-ETS are available “to any student with a disability without regard to type of disability, who needs these services whether or not the student has applied for or been determined eligible for VR services.”
- B. **“Required Pre-ETS Services”** are services and supports that must be provided students with disabilities. They include:
- Job exploration counseling;
 - Work-based learning experiences provided in an integrated environment to the maximum extent possible. This includes experiences in-school, after school or outside the traditional school setting;
 - Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
 - Workplace readiness training to develop social skills and independent living skills; and
 - Instruction in self-advocacy skills.
- C. **“Authorized Pre-ETS Services”** are permissible, within funds available, and only after required Pre-ETS are provided. These activities may be used to improve the transition of students with disabilities from school to postsecondary education or an employment outcome by:
- Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces;
 - Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently, participate in postsecondary education experiences, and obtain and retain competitive integrated employment;
 - Providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities;
 - Disseminating information about innovative, effective, and efficient approaches to achieve the goals of the Pre-ETS provisions of the WIOA
 - Coordinating activities with transition services provided by local educational agencies under the Individuals with Disabilities Education Act (IDEA) (See, 20 U.S.C. 1400 et seq.);
 - Applying evidence-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to better achieve the goals of the Pre-ETS provisions of the WIOA;
 - Developing model transition demonstration projects;

- Establishing or supporting multistate or regional partnerships involving States, local educational agencies, designated State units, developmental disability agencies, private businesses, or other participants to achieve the goals of this section; and
- Disseminating information and strategies to improve the transition to postsecondary activities of individuals who are members of traditionally unserved populations.

D. **“Student with a disability”** is an individual with a disability who is:

- In a secondary, postsecondary, or other recognized education program (includes home schooling and other recognized education programs, including those offered through the juvenile justice system; and
- Not younger than the earliest age for the provision of transition services under the IDEA (14 years old)
- Is not older than 21; and
- Eligible for, and receiving, special education and related services under Part B of the IDEA; or
- Eligible for, and receiving, supports and services under Section 504 of the Rehabilitation Act (Section 504).

E. A youth with a disability is an individual with a disability who is:

- Not younger than 14 years of age; and
- Not older than 24 years of age.

Guidance – Youth with a Disability

There is no requirement that a “youth with a disability” be participating in an education program. The definition of youth with disabilities also includes students with disabilities.

End of Guidance

Local Educational Authority (LEA) is the local school district or supervisory union responsible for overseeing public education services including special education services and Section 504 services.

Section II. Referral and Eligibility for Pre-ETS Services

- A. Pre-ETS must be available Statewide to all students with disabilities, without regard to type of disability, in need of such services whether or not the student has applied for or been determined eligible for DBVI services. The DBVI counselor will maintain frequent contact with the statewide network of Teachers of the Visually Impaired (TVI) who are contracted by the LEA to work with students who are blind or visually impaired and school personnel in area schools and alternative educational sites to ensure identification of students who may benefit from Pre-ETS, as early as age 14 or 9th grade.
- B. Pre-ETS may begin once a student requests or is recommended for one or more Pre-ETS and documentation of a disability is provided. The DBVI counselor will verify the individual meets the definition of a student with a disability by one of the following methods:

1. Verification from a TVI or LEA official that the student is eligible for services through IDEA or Section 504; or
2. Receipt of copies of the IEP or 504 plan.

Section III. Provision of Pre-ETS Required Services

DBVI must provide or arrange for the provision of Pre-ETS for eligible students. DBVI must also coordinate delivery of Pre-ETS with other community rehabilitation providers, schools, one-stop centers, local workforce development boards, and employers. The DBVI counselor will do this by:

- Working with DBVI staff, Employment Consultants, and others to develop work opportunities for students with disabilities, including internships, summer employment opportunities, apprenticeships, and other work opportunities throughout the school year.
- Attending IEP and Section 504 team meetings, when invited; and
- Coordinating with schools to ensure required Pre-ETS are accessible to all eligible students.

The following Pre-ETS may be provided to students individually or in groups:

Job Exploration Counseling

General job exploration counseling in a group setting may be provided in a classroom or community setting. This may include:

- Information regarding in-demand industry sectors and occupations, as well as nontraditional employment;
- Information about 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 may be provided in school or the community. They may include discussions related to the particular student about:

- The student's vocational interest inventory results;
- In-demand occupations;
- Career pathways; and
- Local labor market information that applies to the student's particular interests.

Work Based Learning Experiences:

- May be provided in school, after school, or outside of the traditional school setting; and
- Must be provided in an integrated setting in the community to the maximum extent possible.

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 may include paid or unpaid:

- Internships;
- Progressive employment training placements in the community;
- Apprenticeships;
- Part time or summer competitive employment;
- Fellowships; or
- On-the-job trainings located in the community.

Counseling on Opportunities for Enrollment in Comprehensive Transition or Post-Secondary Educational Programs:

Counseling in a group setting may include providing 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.

Counseling provided on an individual basis may include:

- Advising students and parents or representatives on academic curricula;
- Providing information about college application and admissions processes;
- Completing the Free Application for Federal Student Aid (FAFSA); and
- Providing resources that may be used to support individual student success in education and training (e.g., disability support services).

Work Place Readiness Training

Workplace readiness training services may be provided to help students with disabilities to develop social skills and independent living skills necessary to prepare for eventual employment. Workplace readiness skills may include:

- Communication and interpersonal skills;
- Financial literacy skills;
- Group orientation and mobility skills (e.g., to access workplace readiness training or to learn to travel independently);
- Job-seeking skills; and
- Understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment.

The services discussed above may include:

- Instruction in a generalized manner within the classroom or other group setting;
- Instruction tailored to an individual’s needs in a work readiness training program; and
- Opportunities to apply knowledge and skills in a workplace or other setting.

Instruction in Self Advocacy

Instruction in self-advocacy skills may be provided through generalized classroom lessons in which students:

- Learn how their disability impacts their daily living, including learning, employment and independent living;
- Learn about their rights and responsibilities;
- Learn how to request accommodations or services and supports; and
- Learn how to communicate their thoughts, concerns, and needs in the workplace and other settings.

Instruction may provide students with individualized opportunities to apply self-advocacy skills through activities such as:

- Conducting informational interviews;
- Mentoring with educational staff such as principals, nurses, teachers, or office staff; or
- Mentoring with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings; and
- Participating in youth leadership activities offered in educational or community settings.

Section IV. Provision of Pre-ETS Authorized Services

If VR has determined that the agency can move from providing the required Pre-ETS to authorized Pre-ETS, VR transition counselors with management approval may participate in one or more of the authorized activities outlined in Section I.

Section V. Transition Services for Youth with Disabilities

- A. In the following sections, it is important to note the definition of youth with disabilities also includes students with a disability as defined in Section I. When the term “youth” is used it applies to youth ages 14 through 24. When the term student is used it applies to youth ages 14 through 22 attending school.
- B. DBVI offers a continuum of services for youth with disabilities beginning with Pre-ETS and generally progressing to individualized DBVI transition services. Pre-ETS are intended to prepare students to engage in more individualized DBVI services. Individualized DBVI transition services may be provided to youth determined eligible for the DBVI program and in accordance with an approved IPE. Any allowable DBVI service for an adult can be provided as a transition service for a youth with a disability under an IPE. In certain circumstances, a student with a disability may need Pre-ETS and individualized DBVI services. In such cases, the student must apply and be determined eligible for the DBVI program and have an approved IPE.

Section VI. Referral, Application, Eligibility, and Individual Plan for Employment for DBVI Transition Services

- A. A student with a disability, family member or school professional can make a referral for individualized DBVI transition services at any time. The referral and application procedures are the same as for any other applicant.

Guidance – Application for DBVI Transition Services

While the timing of DBVI application may vary according to the students' needs and interests, it is recommended that most students be encouraged to apply no later than their junior year of high school.

End of Guidance

- B. A DBVI transition counselor must use the same procedures to determine eligibility as for any other VR applicant (See Chapter 1).
- C. The IPE must be developed as early as possible in the transition process and must not be later than the date the student exits high school. Also, as with any other DBVI eligible consumer, the IPE must be developed within 90 days of an eligibility determination unless the student agrees to a specific time extension. The IPE must outline the services and activities that will guide the individual's career exploration and achievement of his or her employment goal. The IPE may include a projected post-school outcome that:
- Is based upon the informed choice of the student or youth with a disability eligible for the DBVI program;
 - May be amended during the career development process; and
 - Must be revised to a specific vocational goal once this process is complete.

Guidance – IPE Development

Students often may not be able to identify a specific vocational goal or may change their minds frequently about their career goals. This is typical for most students. Therefore, the DBVI transition counselor may develop an exploratory IPE with the student.

End of Guidance

- D. Pre-ETS initiated prior to DBVI application can be continued as part of IPE planned services as long as the participant continues to meet the definition of a student (See, Section (I)). Pre-ETS must be listed on the IPE and documented in the VR case management system.

Section VII. Paid Services for In School Students

- A. LEAs are responsible for providing and paying for any transition service that is considered a special education or related services necessary for ensuring a free appropriate public education (FAPE) as required under IDEA and Section 504. Education services that are similar to DBVI services and the responsibility of the LEA include:

- Interpreting services;
 - Psychological services;
 - Assessment of a disability;
 - Physical and occupational therapy;
 - Counseling services, including rehabilitation counseling;
 - Orientation and mobility services;
 - Medical services for diagnostic or evaluation purposes;
 - Transportation;
 - Assistive technology; and
 - Vocational-Technical education, including work experiences, job coaching and support services.
- B. Individual paid services are the LEA's responsibility through the student's transition year. The DBVI transition counselor may authorize paid services outlined in the IPE if such services are not already available through the LEA.
- C. As determined on an individual basis, DBVI may provide for assistive technology (AT) services and devices for a DBVI eligible student.

The AT device or service must meet all of the following criteria:

- The AT is part of an IEP or 504 plan with coordinated transition goals;
- The AT is part of an approved IPE, and;
- The AT is necessary to accomplish a successful transition to employment, post-secondary education, or training.

Section VIII. Supported Employment Services

- A. When a consumer is in need of supported employment services, a referral should be made to the Supported Employment Coordinator at DVR who will assist the consumer and the DBVI counselor in choosing a provider, developing a written contract for services, and developing long-term supports and follow-up services as needed. See Chapters 15, Supported Employment and 22, Division of Vocational Rehabilitation.
- B. The DBVI counselor, VR Transition counselor, the provider, and the consumer will establish work goals (type of job, number of hours/week, etc.) to be included in the consumers' Individualized Plan for Employment.
- C. DBVI staff will provide technical assistance to job developers, job coaches, and employers regarding adaptive devices and techniques that relate to blindness. Additionally, DBVI will arrange for adaptive skills assessment and training (O&M, Low Vision Teaching, Rehabilitation Teaching.)