



VIRGINIA DEPARTMENT FOR AGING
AND REHABILITATIVE SERVICES

DIVISION OF REHABILITATIVE SERVICES

PRE-EMPLOYMENT TRANSITION SERVICES MANUAL

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THE WHY OF PRE-EMPLOYMENT TRANSITION SERVICES

Although efforts have been made to help improve the opportunities of students with disabilities, research continues to show that youth with disabilities are less likely than their peers without disabilities to graduate from high school, attend and complete college, and be employed.¹ Many students with disabilities exit secondary education without having any work experience, securing employment, or attaining placement in postsecondary education or training programs. Numerous students with disabilities have not developed the foundational independent living skills necessary to successfully embark on adult life. Furthermore, a significant number of students with disabilities exit school and directly enter segregated institutions. In these settings, they often earn subminimum wages and do not have the opportunity to interact with peers without disabilities.

Students with disabilities have lacked opportunities, experiences, and supports to prepare for life post school and this has had a profound impact on their adult outcomes. The [October 2017](#) National Council on Disability Report listed people with disabilities as living in poverty at more than twice the rate of people without disabilities. According to the 2017 LEAD Center data, 40.76 percent of working-aged Virginians with disabilities are employed compared to 78.97 percent of those without disabilities. Furthermore, Virginia DARS' most recent Comprehensive Statewide Needs Assessment lists Virginia adults with disabilities as having lower incomes, fewer years of education, increased difficulty accessing healthcare and a greater likelihood of being victims of sexual and non-sexual violence. Therefore, it is critical that the Commonwealth enhance and expand services available to students with disabilities to more effectively support their transition to adulthood and enable them to have opportunities equal to their peers without disabilities.

A core tenet of Title IV of the Workforce Innovation and Opportunity Act (WIOA) is that individuals with disabilities, including youth and individuals with the most significant disabilities, represent a vital and integral part of our society. As such, we must be committed to ensuring students and youth with disabilities have opportunities to compete for and enjoy high-quality employment in the 21st century global economy. This starts by offering pre-employment transition services (Pre-ETS). WIOA mandates state vocational rehabilitation (VR) agencies spend 15 percent of their federal VR grant funds on the provision of Pre-ETS to students with disabilities who are potentially eligible or eligible for the VR program. This expands the population of students who may receive services and the breadth of services DARS may provide. The spirit behind the law is empowering individuals with disabilities to maximize their employment, economic self-sufficiency, independence, and inclusion in and integration into society. This can be achieved by more effectively supporting students with disabilities.

The Virginia Department for Aging and Rehabilitative Services (DARS) views Pre-ETS as a vital set of services that launches the empowerment of students with disabilities. Pre-ETS afford students with disabilities the support to increase their independence and their awareness of themselves, opportunities available in and through the world of work, and pathways to achieve personal and professional success. As a result of believing in students' abilities and effectively delivering Pre-ETS, Virginia students with disabilities will be better prepared to enter adulthood, make informed decisions, participate in and complete postsecondary education and training, and compete for and enjoy high-quality employment.

¹ U.S. Department of Labor, Office of Disability Employment Policy, 2013; Newman, Wagner, Cameto, & Knokey, 2009; Cortiella, 2011.

Therefore, Pre-ETS is not only an investment in Virginia students with disabilities, but also the Commonwealth at large.

PURPOSE OF THIS GUIDE

This manual serves as guidance to DARS' Division of Rehabilitative Services (DRS) staff and describes statewide service provision of Pre-ETS to students with disabilities.

PRE-EMPLOYMENT TRANSITION SERVICES

VR services to students and youth with disabilities are provided on a continuum, with Pre-ETS being the earliest set of services available to students with disabilities. Pre-ETS, authorized by section 113 of the Rehabilitation Act, as amended by WIOA, and implemented by Federal regulation ([34 CFR §361.48\(a\)](#)) are designed to be an early start at job exploration for students with disabilities. Pre-ETS serve to help students with disabilities begin to identify career interests that may be further explored through additional VR services, such as transition services. Pre-ETS should enrich, not delay, transition planning, application to the VR program, and the full continuum of VR services necessary for a student to successfully transition from school to post-school activities. Students with disabilities do not have to apply to the VR program to receive Pre-ETS. However, Pre-ETS are only those services and activities listed in section 113 of the Act, as amended by WIOA, and Federal regulation ([34 CFR §361.48\(a\)](#)). Therefore, if a student requires any individualized VR services, including those necessary to participate in Pre-ETS, the student must apply and be determined eligible for the VR program (refer to [34 CFR § 361.48\(b\)](#) for list of services for individuals who have applied for or been determined eligible for VR services). The student and counselor must also develop an individualized plan for employment (IPE) that includes the needed additional services. **Individualized VR services must be funded separately from the funds reserved for the provision of Pre-ETS, with the exception of certain categories of VR services needed to participate in and benefit from Pre-ETS (see page 16 VR Services that Support Pre-ETS Activities).**

Transition services means a coordinated set of activities for students (definition detailed on page 5 of this manual) and youth (an individual aged 14 to 24) with disabilities designed within an outcome-oriented process that promotes movement from school to post-school activities. Post-school activities include postsecondary education, vocational training, competitive 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 or youth's needs and take into account the individual's preferences and interests. The activities 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 must promote or facilitate the achievement of the identified employment outcome in the student's Individualized Plan for Employment (IPE). In addition, transition services include outreach to and engagement of parents or, as appropriate, the representatives of students or youth with disabilities ([34 CFR §361.5\(c\)\(55\)](#)).

Pre-ETS are only available to students with disabilities, whereas VR transition services may be provided to both students and youth with disabilities. Pre-ETS are made available statewide with different activities offered to students based on their age and Pre-ETS needs. The lists on the next page give

examples of Pre-ETS activities available to potentially eligible students with disabilities and Pre-ETS and VR transition services that may be available to students with disabilities who have applied to the VR program.

Services Available to Potentially Eligible Students with Disabilities

- Pre-ETS: example activities include, but are not limited to:
 - Interest inventories
 - Review of labor market information
 - Exploration of career pathways
 - Informational interviews
 - Job shadowing
 - Work-site tours
 - Exploration of postsecondary education/training options and campus tours
 - Education in financial aid options and processes
 - Soft skills instruction and teaching employer expectations
 - Independent living skills instruction
 - Financial literacy training
 - Teaching how to request accommodations
 - Teaching rights and responsibilities
 - Development of self-advocacy skills
 - Education about transportation options, travel training, and driver’s education
 - Education about common uses of assistive technology to support independent living skills and job productivity
 - Career exploration academies

Examples of Services Available to Vocational Rehabilitation Students with Disabilities*

(Not an exhaustive list of services)

- Pre-ETS, including example activities listed on left side of this page
- Pre-ETS that require an open VR case, such as:
 - Wilson Workforce and Rehabilitation Center Postsecondary Education Rehabilitation Transition (PERT) Program
 - WWRC Pre-Employment Readiness and Education Program (PREP) (is a Pre-ETS if participant is a SWD, otherwise is a VR service)
 - Project SEARCH (first two milestones are Pre-ETS)
 - Start on Success
- Development of the IPE
- Vocational evaluation
- Situational assessment
- Individualized assistive technology assessment and services
- Individualized driving evaluation
- Postsecondary education/training
- Job development for IPE goal
- Job placement for IPE goal
- Job Coaching and Supported Employment services
- On-the-job training for IPE goal
- Time-limited transportation assistance

WHO MAY RECEIVE PRE-EMPLOYMENT TRANSITION SERVICES?

Students with disabilities who need Pre-ETS may receive Pre-ETS. A student with a disability is an individual aged 14 through 21² who is enrolled in a secondary, postsecondary, or other recognized education programs and:

- a) is receiving special education or related services under Part B of the Individuals with Disabilities Education Act (IDEA) or
- b) for purposes of Section 504 of the Rehabilitation Act, is an individual with a disability.

² A student may be age 22 if the student is enrolled in a recognized education program and has not reached their 22nd birthday before September 30. The student would qualify to receive Pre-ETS through the last day of that school year.

For the purposes of the definition of a student with a disability, examples of other recognized education programs include licensed/accredited psychiatric residential treatment facilities, private day programs, and other state operated programs as defined in State Regulation 8VAC20-81-10 (refer to page 13 of this manual for additional information about recognized education programs for students with disabilities who have exited secondary school). A student with a disability does not have to be receiving specialized services under an IEP or have a section 504 accommodation in school in order to qualify for Pre-ETS. However, documentation of a disability is necessary in order to assess eligibility for Pre-ETS.

All students with disabilities who are potentially eligible or eligible for the VR program and in need of Pre-ETS may receive the Pre-ETS they need. A potentially eligible student is any student with a disability who has not applied and been determined eligible or ineligible for the VR program. Therefore, if a student with a disability has been determined ineligible for the VR program, they would no longer qualify to receive Pre-ETS because they are no longer considered potentially eligible. (Refer to page 12 of this manual for more information about these situations).

Students with disabilities connected with DARS for the provision of Pre-ETS will have one of two DARS AWARE case types: Potentially Eligible (PE) or Vocational Rehabilitation (VR). Students with disabilities who have not applied for the VR program will have a PE case. Students who have applied to the VR program and are in the eligibility determination process or have been determined eligible will have a VR case. The term “potentially eligible” applies only in the context of Pre-ETS. Therefore, if students with disabilities require individualized services beyond the scope of Pre-ETS, or require certain VR services in order to participate in and benefit from Pre-ETS, they must apply and be determined eligible for the VR program, be assigned to the appropriate priority category, be off the wait list for VR services, and have an approved IPE to receive the additional VR services they need. However, as explained in the Order of Selection and Pre-Employment Transition Services section of this manual (page 16), it is imperative that students with disabilities begin to receive at least one Pre-ETS before being determined eligible for VR services and receipt of the Pre-ETS they started to receive is documented in the student’s case record.

SCOPE OF PRE-EMPLOYMENT TRANSITION SERVICES

There are five Pre-ETS all state VR agencies must provide to students with disabilities who need these services, regardless of whether a student has applied and been determined eligible for the VR program. These five Pre-ETS are referred to as the required services. These services are:

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 internships), that is provided in an integrated environment in the community to the maximum extent possible (VR agencies are to exhaust all opportunities for work-based learning experiences in integrated settings before placing an individual in a non-integrated setting);
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 (including instruction in person-centered planning), which may include peer mentoring.

There are four coordination activities each local office must carry out. These services are:

1. Attending individualized education program meetings for students with disabilities, when invited;

2. Working with the local workforce development boards, One-Stop/American Job Centers, and employers to develop work opportunities 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);
3. Working with schools, including those carrying out activities under section 614(d) of the IDEA,³ to coordinate and ensure the provision of Pre-ETS under this section; and
4. When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act.

If funds remain, VR agencies may provide nine additional authorized Pre-ETS to improve the transition of students with disabilities from school to postsecondary education or employment. These additional nine services are referred to as the authorized Pre-ETS. These services are:

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, advance in 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 IDEA ([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 (VR agencies), 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 unserved and underserved populations.

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 in a group setting 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;
 - information about labor market composition;
 - administration of vocational interest inventories; and
 - identification of career pathways of interest to the students.

³ Section 614 (d) of IDEA sets forth requirements for Individualized Education Programs (IEP).

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 the student's particular interests.

Note: Providing assessment services is not an allowable Pre-ETS and may not be included as part of any Pre-ETS activities, including activities to support job exploration counseling. Pre-ETS are designed to be an early start at job exploration and support students to learn more about their interests, the labor market and various career pathways. Should a student need assessment services to identify if a career area of interest best matches their strengths, abilities and capabilities or to determine their VR needs to achieve an employment outcome, the student must submit an application to the VR program. Review of existing assessments, such as those performed by the local school division, is an allowable Pre-ETS activity. **A student must apply and become eligible for the VR program with an approved IPE if they require VR assessment services (such as a comprehensive vocational evaluation) in order to fully participate in and benefit from Pre-ETS or to determine their VR needs to achieve an employment outcome.**

2. Work-based learning experiences in a group setting could 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; and
 - career mentorship opportunities in the community.

Work-based learning experiences on an individual basis to support a student to explore their particular area of interest could include paid or unpaid:

- 3-8 week work experiences/internships (up to 120 hours);
- apprenticeships (not including pre-apprenticeships and Registered Apprenticeships);
- short-term employment; and
- fellowships.

Pre-ETS work-based learning experiences 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. **Students requiring more individualized VR services (e.g. assessments, transportation, maintenance, family services) in order to participate in and benefit from a work-based learning experience, must first apply and become eligible for VR services with an approved IPE in order to qualify for such services.**

A work experience provides a student with knowledge and skills to connect school experiences with authentic work activities and future career opportunities under close supervision of business staff and an ESO skills trainer (as needed). Work experiences must be a minimum of three weeks and no greater than eight weeks in length, unless otherwise approved by the Transition and Education Services Coordinator (or designee).

Students may participate in one paid or unpaid 3-8 week work experience supported by a Pre-ETS vendor (through cost services) per year. This requirement ensures that Pre-ETS can be made available to all Potentially Eligible students with disabilities who need such services. A student's VR counselor may request an exception to the annual limit in writing from the Transition and Education Services Coordinator (or designee). Exceptions shall be allowed in situations where the coordinator determines sufficient funds are available and the second work experience is separate and distinct from the first.

Approved ESOs and host Employers may seek DARS reimbursement for student work experience payments with prior written authorization from DARS. Overtime is not reimbursed by DARS. A student can work overtime and receive payment from the employer; however, DARS will not reimburse the employer for overtime hours worked by the student. The employer assumes all legal obligations for the student, including issuing wages earned, calculating and withholding payroll deductions, and providing unemployment insurance and worker's compensation coverage. The employer compensates student at a competitive wage and handles every aspect of the payroll administrative process from implementing timekeeping to delivery of paychecks.

Student payments may not occur for work experiences within an ESO's place of business or for contract work performed by the ESO. It is the Pre-ETS Vendor and/or Employer's responsibility to ensure that a student's work experience complies with all applicable state and federal labor laws, to include the Department of Labor (DOL) Fair Labor Standards Act (FLSA) requirements. Please visit the DOL FLSA Advisor webpage to ensure that work experiences in which students are not hired as an employee by the host business meet the criteria described for internships. It is also the provider's responsibility to ensure that students receiving non-compensatory stipend payments understand that they are not entitled to compensation for their hours worked, but instead are receiving payment to cover costs they might incur and to create a more authentic work-based learning experience. Student payments during a work experience must be at a rate consistent with the effective state minimum wage.

3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education in a group setting could include information on:
 - postsecondary opportunities associated with career fields or pathways;
 - types of academic and occupational training needed to succeed in the workplace;
 - course offerings; and
 - career options.

The aforementioned information may also be provided on an individual basis and might include:

- advising students and parents or representatives on academic curricula;
- advising students and parents or representatives on college application and admissions processes;
- completing the Free Application for Federal Student Aid (FAFSA); and
- sharing resources that may be used to support individual student success in education and training, such as providing information about disability support services.

4. Workplace readiness training supports students to learn skills and behaviors that are necessary for employment success and services may be offered through instruction in a classroom or similar group setting. These services could include teaching:
 - specific social and interpersonal skills (such as communication, problem solving, active listening, conflict resolution, etc.);
 - financial literacy;
 - using transportation (including general education about transportation options, driver's education, and travel training for public transit);
 - job-seeking skills; and
 - understanding employer expectations for punctuality and performance, as well as other foundational skills necessary for employment.

The above listed examples may also be provided on an individual basis and tailored to a specific student's need(s). The student's work readiness training program could be provided in an educational or community-based setting. The services may include instruction as well as opportunities to acquire and apply the knowledge.

5. Instruction in self-advocacy in a group setting may include generalized lessons in which students learn about:
 - rights and responsibilities;
 - goal-setting;
 - how to request accommodations, services, and supports; and
 - how to effectively communicate their thoughts, concerns, and needs (this can prepare students for peer mentoring opportunities with individuals working in their area(s) of interest).

Individual opportunities for instruction in self-advocacy may be arranged for students to:

- conduct informational interviews;
- mentor with educational staff, such as principals, nurses, teachers, or office staff;
- mentor with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings;
- engage in peer and disability mentoring relationships; and
- participate in youth leadership activities offered in educational or community settings.

WHO PROVIDES PRE-EMPLOYMENT TRANSITION SERVICES?

DARS staff work collaboratively to ensure students with disabilities in need of Pre-ETS receive these services. DARS VR counselors support PE and VR students with disabilities with accessing the Pre-ETS they need by arranging for and often also providing these services. As necessary, VR counselors link students with disabilities with other agency staff and community providers to further support Pre-ETS needs.

All staff in a local DARS office engage in consistent communication and collaboration to ensure coordinated delivery of meaningful Pre-ETS to the students served by the office. In addition to VR counselors, DARS staff that assist in the delivery of Pre-ETS include, but are not limited to, employment support specialists, workforce specialists/placement counselors, vocational evaluators/career assessment counselors, business development managers and assistive technology specialists. DARS

capitalizes on the unique expertise of its diverse staff to support students with an early start at job exploration and to practice and improve workplace skills and behaviors that will prepare students for successful transitions from school to post-school life.

The Wilson Workforce and Rehabilitation Center (WWRC) is another entity within DARS that provides Pre-ETS to students with disabilities who are potentially eligible or eligible for the VR program. WWRC's Postsecondary Education Rehabilitation Transition Program (PERT), Pre-employment Readiness and Education Program (PREP), Career Exploration services, and Pre-ETS Career Day are Pre-ETS activities for students with disabilities. PE and VR students with disabilities are linked with Pre-ETS programs and services at WWRC by their DARS counselor.

Finally, DARS contracts with community-service providers to enhance and expand the provision of Pre-ETS. Students with disabilities work with their DARS counselor and team of support to identify Pre-ETS needs and services to support these needs. If the Pre-ETS offerings of a community-service provider approved to provide Pre-ETS are necessary to assist the student with developing pre-employment skills and career awareness, the DARS counselor connects the student with the provider. The DARS counselor coordinates the delivery of services provided by the community service provider and engages in ongoing collaboration with the provider for the duration of service delivery to ensure the student's needs are met.

AGENCY PRE-EMPLOYMENT TRANSITION SERVICES PROCESSES

Secondary students with disabilities are informed of services available through DARS, including Pre-ETS, starting at age 14. Students with disabilities identified in need of Pre-ETS are encouraged to be linked with DARS through the agency's PE case type so they may begin receiving Pre-ETS. There are multiple ways a student can be identified as needing Pre-ETS, but examples include being identified by their schools, families/caregivers, themselves, or other service provider with whom they are connected.

WHAT'S NEEDED TO BEGIN RECEIVING PRE-ETS?

For a student to begin receiving Pre-ETS they must have:

- a need for one or more Pre-ETS;
- signed consent from their parent/guardian or themselves (if they are an adult student and their own legal guardian) to be connected with DARS to receive Pre-ETS; and
- documentation identifying they are:
 - between the age of 14 and 21 (22 if this age is attained during the school year after the date of September 30);
 - enrolled in a recognized education program; and
 - an individual with a disability for purposes of Section 504 of the Rehabilitation Act.

For students in secondary education, examples of acceptable documentation include, but are not limited to, an IEP or 504 Plan. Remember that a student with a disability does not have to be receiving specialized services in school in order to qualify for Pre-ETS.

The DARS counselor is responsible for informing students and their support teams of the benefits of first having a PE case and beginning to receive at least one Pre-ETS prior to applying to the VR program. This is because Virginia operates under an Order of Selection) and the student's VR priority category may be closed. Students who have begun receiving at least one Pre-ETS prior to applying and being determined

eligible for the VR program, are able to continue to receive any needed Pre-ETS even if they are placed in a closed priority category and on the wait list for VR services. Providing students and their support teams with this information will allow them to make informed decisions about how to proceed with services. However, it is a student's right to decline opening a PE case and instead go straight to the VR application.

If a student applies to the VR program without having begun receiving Pre-ETS, they may start receiving Pre-ETS during their VR intake. Counselors can offer and provide a Pre-ETS in addition to completing the VR intake meeting and application paperwork. If a student chooses to receive this service, the counselor documents the Pre-ETS the student began receiving in the student's AWARE record. This qualifies the student to continue to receive Pre-ETS while on the wait list for VR services.

HOW DOES DARS STAFF DETERMINE PRE-ETS NEEDS?

DARS counselors communicate with students and their teams of support to determine Pre-ETS needs. Two tools are also available to support DARS with identifying students' Pre-ETS needs. The first is the Pre-Employment Transition Services Needs Survey (form PreETS-5). This is not a required form, but it is encouraged to be completed. The second tool is the Pre-Employment Transition Services Guide (form PreETS 8). This tool is required to be completed within 90 days of opening a PE or VR case for all students with disabilities served by the agency. This tool helps guide conversations to identify students' needs related to core Pre-ETS topics. Counselors check off when a topic is covered and includes information about the entity that addressed the identified topic area with the student. The Pre-ETS Guide is reviewed as needed to ensure the student's needs are monitored on an ongoing basis.

WHEN DOES A STUDENT WITH A PE CASE APPLY FOR VR?

A student can apply to the VR program at any time and DARS counselors are required to inform students about the VR program application procedures when they begin working with a student. However, a student is not required to apply for VR services if they are only interested in Pre-ETS. All five required and four coordination Pre-ETS are made available statewide to support students with disabilities. However, certain Pre-ETS activities are only available to students who have applied to the VR program. This is because components of these activities or ancillary services that complement these activities include VR services.

The Rehabilitation Services Administration (RSA) recommends in the preamble to Pre-ETS in the code of Federal regulations ([p. 55691](#)) that VR agencies request students with disabilities receiving Pre-ETS submit an application for VR services as soon as possible in the event the student needs VR services. DARS counselors collaborate with local school divisions and community partners to educate students and their parents/representatives about Pre-ETS and VR services. This provides students with disabilities and their families an opportunity to make informed decisions about applying for VR services early in the transition process to promote a smooth progression into the VR program, **as well as to access additional VR services needed to fully participate in and benefit from Pre-ETS. It is therefore a requirement that a student's PE case record documents they've been informed about VR services and application for VR services.**

DARS counselors have a responsibility to continually monitor potentially eligible students' needs for VR services. This monitoring occurs upon a student being first referred for services as well as throughout the student's PE case, as they receive services from DARS staff and other service providers. This is because students who have not applied for VR services may require individualized services beyond the scope of Pre-ETS (e.g., transition and other VR services). Furthermore, in some circumstances a student

may require certain VR services in order to fully participate in and benefit from Pre-ETS. In these situations the student is encouraged to apply to the VR program as soon as possible because students cannot receive individualized VR services, including VR services needed to participate in Pre-ETS, unless they have applied and been determined eligible for the VR program with an approved IPE in place.

If a student has not applied for VR services and it is realized they will require individualized services beyond the scope of Pre-ETS (e.g., transition and other VR services), the student is encouraged to apply to the VR program as soon as possible. This is because students cannot receive individualized VR services, including VR services needed to participate in Pre-ETS, unless they have applied and been determined eligible for the VR program and have an approved IPE in place. Students two years from school exit who have been identified as likely needing VR services post high school and who have not applied to the VR program are particularly encouraged to plan with their team when to complete an application to the VR program. It is important transitioning students in need of and eligible to receive VR services have access to the full continuum of services offered by DARS prior to exiting secondary education. This enables students to receive the individualized VR services necessary to promote successful transitions employment and adult life.

The Student Referral to DRS (form ESU-3) may be used for student referrals to the VR program. However, staff shall not require this or any other form to make a referral. Referrals for VR services are handled promptly and equitably per Federal regulation ([34 CFR § 361.41](#)). Per agency mandate, DARS staff initiate contact to schedule the VR intake meeting to complete the application for services within ten business days of receiving a referral. If the first attempt is unsuccessful, staff make a second attempt as soon as possible.

The DARS VR counselor has a responsibility to facilitate students' applications to the VR program. VR counselors work with the student, their family/representatives and schools to coordinate the VR intake at a time and location mutually agreed upon by all parties. Transportation to attend a VR program orientation or initial meeting with a VR counselor in order to complete an application for VR services may be authorized for students who are potentially eligible for the VR program. This assistance is within the scope of services for VR referrals per DARS' VR program policy (DRS Policy and Procedures Manual, [Chapter 2.1](#), Section B, Scope of Services for Referrals).

WHEN TO CLOSE A PE CASE

A PE case is closed when any one of the following situations apply:

- The student chooses to apply to the VR program;
- The student no longer has a need to receive Pre-ETS because their current Pre-ETS needs have been met;
- The student is no longer interested in receiving Pre-ETS and requests their PE case be closed; or
- The student no longer meets the definition of a student with a disability (this includes a 22 year old student who completes the school year in which the age of 22 was attained).

WHAT IF A STUDENT APPLIES FOR VR SERVICES AND IS DETERMINED INELIGIBLE?

Pre-ETS are for students who are eligible or potentially eligible for the VR program. According to the Rehabilitation Services Administration, individuals who have already been determined ineligible for the VR program are no longer considered potentially eligible because an eligibility determination was made. Therefore, if a student is determined not eligible for VR services they may not continue to receive Pre-

ETS. However, should a student's situation change, they are encouraged to reapply for VR services so they may have their eligibility determination reevaluated.

Federal regulations preclude agencies from closing a case without determining eligibility except when the applicant declines to participate or is unavailable to complete an assessment for determining eligibility. Therefore, as with any case in Application-T (Trial Work) status, it is imperative to identify how to support the applicant with trial work experiences that will enable them to demonstrate their full abilities, and more importantly, capabilities, when provided necessary VR services and supports. For the case of a student in Application-T status, the counselor shall consult with their supervisor and/or the Transition and Education Services Coordinator to ensure the student applicant is being most appropriately supported and has every opportunity to receive a favorable eligibility determination outcome.

PROVIDING PRE-ETS TO STUDENTS WHO HAVE EXITED SECONDARY SCHOOL

The definition of a student with a disability includes students in postsecondary or other recognized education programs. Recognized educational programming under the definition of student with a disability includes programs that provide a recognized credential of education, such as a certified nursing assistant program. A recognized postsecondary credential is defined as a credential consisting of: an industry-recognized certificate or certification; a certificate of completion of an apprenticeship; a license recognized by the state or the federal government; or an associate, baccalaureate, or graduate degree. There are four pieces of documentation needed for an individual to be considered enrolled in a recognized postsecondary education program so they may continue to meet the definition of a student with a disability. They are:

1. Documentation that the student graduated from secondary education;
2. Documentation that the student has been accepted into a postsecondary education institution/program;
3. Documentation of the student's intent or confirmation that they accepted the invitation to enter the postsecondary program; and
4. Documentation that the student has been informed by the institution that their "seat" or "spot" is being held for them.

When all four of these documentation requirements are met and filed in an individual's DARS DocFinity record and the individual meets the age and disability requirements of a student with a disability, the individual may continue to receive Pre-ETS that are needed. Therefore, providing documentation in DocFinity, a student with a disability who has graduated from high school and been accepted into a postsecondary education or training program that meets the definition of a recognized education program can still receive Pre-ETS. This includes receiving Pre-ETS during the summer between high school and the start of the postsecondary education program. Postsecondary students in recognized education programs may continue to receive Pre-ETS through the age of 21. If a postsecondary student turns 22 after September 30 of a school year, the individual may continue to receive Pre-ETS they need until the last day of that school year.

Some students with disabilities may have graduated from their secondary education program, been admitted or accepted into a postsecondary education program but have their start date delayed or deferred for various reasons. This creates a gap year or semester. The length of time of the gap is not an issue. As long as the aforementioned four pieces of documentation are in the student's case record, they may continue to receive any needed Pre-ETS. The VR counselor must 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.

Below are examples of documentation that would suffice for the four required areas. It is possible a piece of documentation could fulfill more than one of the required areas. If you are using one piece of documentation to satisfy more than one area, you must document an Actual Service entry listing the piece of documentation saved to DocFinity, the required documentation areas it fulfills, and why.

1. Documentation that the individual with a disability graduated from secondary education
 - High school diploma
 - Final high school transcript
2. Documentation that the individual with a disability has been accepted into a postsecondary education institution/program.
 - Acceptance letter/email from the institution/program
 - Tuition receipt (as the individual would have to have been accepted into the institution/program in order to pay tuition)
 - Confirmed class schedule (as an individual would have to have been accepted into the institution/program in order to enroll in classes)
3. Documentation of the individual with a disability's intention or confirmation that they accepted the invitation to enter the postsecondary program.
 - Tuition receipt
 - Confirmed class schedule
4. Documentation that the individual with a disability has been informed by the institution that their "seat" or "spot" is being held for them.
 - For students not taking a gap semester/year, the tuition receipt or confirmed class schedule would document the student's seat/spot is being held for them
 - For individuals taking a gap semester/year, a letter/email from the institution/program informing the student that their seat/spot is being held is required.

GROUP VERSUS INDIVIDUAL PROVISION OF PRE-ETS

DARS may offer Pre-ETS to students with disabilities in group settings or on an individual basis. When Pre-ETS are provided in group settings, these services are more general in nature. For example, job exploration counseling provided in group settings may include the presentation of local labor market composition, in-demand occupations, and administration of vocational interest inventories. Conversely, 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 manner in which Pre-ETS are delivered (either in a group setting or on an individual basis) varies depending on the Pre-ETS activity as well as the amount of information the counselor has available regarding the student with a disability being served. RSA clarified in the preamble to the implementing regulations ([p. 55694](#)) that VR agencies may have limited information regarding needs of students who

have not applied for VR services. As such, it may be more appropriate to provide Pre-ETS in a group setting. As the individual progresses through the VR process and has been determined eligible or developed an IPE, VR agencies will have the necessary information to provide more individualized and customized Pre-ETS to meet the student's specific needs. The provision of Pre-ETS as generalized and/or individualized, further demonstrates the continuum of services DARS offers students with disabilities.

INFORMED CHOICE FOR POTENTIALLY ELIGIBLE STUDENTS WITH DISABILITIES

Informed choice, as outlined in Federal regulation ([34 CFR § 361.52](#)), applies throughout the VR process. This includes potentially eligible students who are receiving Pre-ETS but who have not applied for VR services or who are in the process of applying. All students with disabilities must be given the opportunity to exercise their informed choice. This is imperative, as a foundational component of Pre-ETS is supporting students with disabilities to understand informed choice and gain the knowledge and experiences necessary so they can make informed decisions for their futures.

ACCESS TO PRE-EMPLOYMENT TRANSITION SERVICES

Auxiliary aids and services needed by a student with a disability to access or participate in Pre-ETS are allowable Pre-ETS service expenditures. If a student with a disability requires an auxiliary aid or service to access or participate in any of the Pre-ETS specified in federal regulation ([34 CFR § 361.48\(a\)\(2\)](#)), DARS must pay for such costs with the funds reserved for Pre-ETS if no other public entity is required to provide the aid or service.

Title II regulations of the Americans with Disabilities Act (ADA) definition of auxiliary aids and services in Federal regulation ([28 CFR § 35.104](#)) is as follows:

Auxiliary aids and services include:

- (1) Qualified interpreters (including foreign language interpreters) on-site or through video remote interpreting (VRI) services; note takers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to individuals who are deaf or hard of hearing;
- (2) Qualified readers; taped texts; audio recordings; Brailled materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered materials available to individuals who are blind or have low vision;
- (3) Acquisition or modification of equipment or devices; and
- (4) Other similar services and actions.

Examples of allowable auxiliary aids and services to be purchased are:

- 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. Note that the screen reader software for individuals who are blind or visually-impaired, not the computer on 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-ETS.
- 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-ETS for an individual who is deaf.

Personal devices and services do not meet the definition of auxiliary aids and services. Personal devices and services include individually prescribed devices, such as prescription eyeglasses or hearing aids, readers for personal use or study, or services of a personal nature ([28 CFR § 35.135](#) and [34 § CFR 104.44\(d\)\(2\)](#)). If a student with a disability requires personal devices or services or individually prescribed assistive technology, the student will need to apply and be determined eligible VR services and have an approved IPE in place in order to receive those additional services. Services not constituting Pre-ETS or auxiliary aids and services necessary for a student to access or participate in Pre-ETS may not be paid with funds reserved for the provision of Pre-ETS. These additional services must be paid with non-reserved VR funds.

VR SERVICES THAT SUPPORT PRE-ETS ACTIVITIES

In a ruling by the Education Department on 02/28/2020, State VR Agencies were authorized to utilize Federal VR funds reserved for Pre-ETS in order to provide certain VR services that allow students to participate in and benefit from Pre-ETS. The Department requires that students become eligible for the VR program and have an approved IPE in place before these VR services can be allocated to the 15% Pre-ETS reserve.

In determining whether a VR service can be allocated to the 15% Pre-ETS reserve, a VR counselor must ensure that the VR service is consistent with the nature, scope, and purpose of Pre-ETS. The Department of Education describes the nature, scope, and purpose of Pre-ETS as being;

- The earliest set of services available for students with disabilities under the VR program;
- Short-term in nature;
- Designed to help students to identify career interests.

Furthermore, in accordance with 2 CFR part 200 (Office of Management and Budget’s Uniform Guidance), these VR services must be reasonable, necessary, and allocable in order to be drawn from the 15% Pre-ETS reserve. Services are:

- Reasonable if in their nature and amount they do not exceed that which might be incurred by a prudent person under the circumstances that existed at the time the decision was made to incur the cost; AND
- Necessary if they are required for the provision or receipt of Pre-ETS; AND
- Allocable if the service(s) benefit the provision or receipt of Pre-ETS.

The following VR services may therefore be needed by students with disabilities to participate in and benefit from Pre-ETS activities, and may also be paid for using Pre-ETS reserve funds. Students must have an approved IPE prior to counselors authorizing these VR services using Pre-ETS reserve funds. The use of Pre-ETS funds for these VR services will be taken on a case-by-case basis and must receive prior approval from a counselor's supervisor which is documented in an actual service note.

- **ASSESSMENT SERVICES** – Assessment services described in Section 103(a)(1) and 34 CFR 361.48(b)(2) are provided to eligible individuals to determine VR needs to reach an employment outcome. These services are generally provided very early in the VR process and are therefore consistent with the nature, scope, and purpose of Pre-ETS. Since assessment services are needed to determine VR needs, it is reasonable that these services may be needed by a student with a disability while engaging in any of the five required Pre-ETS to fully benefit from those activities.
- **MAINTENANCE** – Maintenance covers additional costs incurred while an eligible individual is receiving VR services. It is reasonable that an eligible SWD who is participating in Pre-ETS could incur additional costs to participate in those services (e.g. required clothing for a work-based learning experience or the purchase of a talking alarm clock for workplace readiness training). It is not reasonable to provide maintenance services to all eligible SWDs in all circumstances with the use of reserved funds, however. VR agencies must ensure the maintenance is directly supporting participation in a Pre-ETS activity, and not any other VR services.
- **TRANSPORTATION** – VR agencies may provide transportation services to eligible individuals throughout the VR process. It is reasonable that an eligible student with a disability may need transportation services to benefit from any of the Pre-ETS (e.g. to attend counseling sessions, work-based learning experiences, self-advocacy training sessions, or learning to travel independently as a workplace readiness lesson). Agencies must ensure the costs are reasonable, which takes into account the duration of the Pre-ETS a student is participating in and whether the costs might be more appropriately paid with other VR funds.
- **FAMILY SERVICES** – Services to the family must be provided in combination with another VR service when necessary for an eligible individual to achieve an employment outcome. Similarly, these services must be provided in direct connection to a Pre-ETS activity in order to be allocable to the Pre-ETS reserve funds. It is reasonable that a family member could need services, such as a language interpreter to understand consent forms being signed to participate in Pre-ETS.

Counselors should consult with their supervisor and/or the Transition and Education Services Coordinator prior to authorizing any of the aforementioned VR services from the Pre-ETS reserve funds.

Counselors are also required to conduct a search of comparable benefits for all VR services, even if they are among those required for a student to participate in and benefit from Pre-ETS. The only exception to the comparable benefit requirement is for auxiliary aids and services being provided to potentially eligible students with disabilities, as mentioned in the previous section.

Finally, the aforementioned VR services are subject to the same financial participation requirement policies in the VR Policy and Procedure Manual, regardless of whether VR or Pre-ETS reserve funds are

being used to pay for them. This means if a VR service is exempt from financial participation requirements, it will be exempt for students who require the VR service to participate in or benefit from Pre-ETS activities.

ORDER OF SELECTION AND PRE-EMPLOYMENT TRANSITION SERVICES

All students with disabilities who apply for VR services, even if they are receiving Pre-ETS, are subject to all relevant requirements for eligibility, Order of Selection, and development of the IPE within 90 days of the eligible date.⁴ Therefore, if a student is determined eligible for VR services and assigned to a closed priority category, the VR counselor cannot develop an IPE for that student.

Per Federal regulation ([34 CFR § 361.36\(e\)\(3\)](#)), if a student with a disability is determined eligible for VR services and under OOS their assigned priority category is closed, Pre-ETS may continue if at least one Pre-ETS had begun prior to their applying and being determined eligible for VR. The student may continue to receive the Pre-ETS they had begun receiving. In addition the DARS counselor may also initiate any other Pre-ETS it is determined the student needs, even if these Pre-ETS are initiated after the student has been placed in the closed priority category. However, the DARS counselor cannot provide any other VR services for those students assigned to closed priority categories until their disability priority category opens and they are able to be served as a VR-eligible individual.

Should an individual in a closed priority category cease to meet the definition of a student with a disability (i.e., age out, leave school, etc.), Pre-ETS must be discontinued. No other VR services can be coordinated or provided until their category becomes open to be served.

PRE-EMPLOYMENT TRANSITION SERVICES DOCUMENTATION

DOCUMENTATION IN AWARE

DARS counselors coordinate with students, their families/representatives, and schools to identify Pre-ETS needs and how these services will be provided. This information is documented in AWARE in the form of an Actual Service entry.

DARS is required to track and report Pre-ETS services and activities for each student receiving Pre-ETS who is eligible or potentially eligible. This includes:

1. Documenting how the student qualifies as a student with a disability
 - a) Individual is a student with a disability and has a section 504 accommodation
 - b) Individual is a student with a disability and is receiving transition services under an Individualized Education Program (IEP)
 - c) Individual is a student with a disability who does not have a section 504 accommodation and is not receiving services under an IEP

⁴ The development of the IPE for a transition student shall be completed and signed prior to the student exiting the secondary setting. Per DARS policy, if the IPE for a transition case is not finalized and signed before the student exits secondary school, the counselor shall document supervisor consultation. (For additional details, refer to the DRS Policy and Procedures Manual, Chapter 5, Section A3, Eligible E Status).

- d) Individual is not a student with a disability (and thus would not be able to receive Pre-ETS)
2. Documenting the required data elements for all SWDs, including PE clients, receiving Pre-ETS
 - a) A unique identifier
 - b) Social security number (if available)
 - c) Date of birth
 - d) Race (required if student is in secondary education)
 - e) Ethnicity (required if student is in secondary education)
 - f) Student with a disability
 - g) Start date of Pre-ETS
 - h) Pre-ETS provided (only includes the five required)
 3. For each required Pre-ETS the student received, there are six potential data elements to record in AWARE so they can be reported to RSA:
 - a) How the service was provided:
 - I. VR agency staff in house,
 - II. VR agency purchase, or
 - III. comparable benefit.
 - b) The type of service provider:
 - IV. Public Community Rehabilitation Program (CRP) or in Virginia, Employment Services Organization (ESO),
 - V. Private CRP/ESO, or
 - VI. Public service provider.
 - c) The amount expended for the service:
 - VII. Expenditures per quarter for purchased services only.

As previously noted, students with disabilities who have exited secondary education and begun or accepted admittance into a recognized postsecondary education program and have a start date may continue to receive Pre-ETS. The following documentation must be included in AWARE and/or the DocFinity case records of these students:

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 postsecondary education institution or program;
3. Documentation of the individual with a disability's intention or confirmation that they 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 specific Pre-ETS the student receives are tracked in the student's AWARE case record through Actual Service entries.

HOW TO USE DOCFINITY WITH POTENTIALLY ELIGIBLE CASES

The same categorization structure in DocFinity is used for PE cases as for VR cases. For example, if an IEP is submitted as documentation the student meets the definition of a student with a disability, the student's IEP is filed in the "DRS_IEP" folder. Pre-ETS consent forms are scanned to the "DRS_Pre-ETS"

folder and labeled “Pre-ETS 1001 – Pre-ETS Consent & Information and Release.” The “Pre-ETS Misc” folder is only used for documents that do not fit in any of the other DocFinity categories.

WHEN DO PRE-EMPLOYMENT TRANSITION SERVICES END?

Pre-ETS end once a student no longer needs these services, is no longer interested in receiving these services, or the individual ceases to meet the definition of a student with a disability. An individual ceases to meet the definition of a student with a disability when they exceed the maximum age or are no longer enrolled in secondary, postsecondary or other recognized education program. Therefore, if an individual no longer meets the definition of a student with a disability, despite the fact that they have received or are receiving Pre-ETS, they are no longer able to receive these services under section 113 of the Act and Federal regulation ([34 CFR §361.48\(a\)](#)). However, if the individual has been determined eligible for VR services and has been assigned to an open priority category, they may continue to receive the same types of Pre-ETS under section 103(a) of the Act and Federal regulation ([34 CFR § 361.48\(b\)](#)), in accordance with an approved IPE. These services would be paid for with VR funds other than those reserved for the provision of Pre-ETS because the reserved funds must be used solely for the provision of Pre-ETS to persons who meet the definition of a student with a disability.

APPEAL RIGHTS OF POTENTIALLY ELIGIBLE STUDENTS WITH DISABILITIES

Like their VR counterparts, students with disabilities who are potentially eligible have certain appeal rights ([34 CFR § 361.57](#)). When Pre-ETS will be reduced, suspended or terminated, DARS staff must provide written notice to the PE student with a disability. The written notice should inform the PE student of their right to proceed directly to a fair hearing, request assistance from the disAbility Law Center of Virginia (the Commonwealth’s Client Assistance Program (CAP)) and request Mediation. (For additional information refer to the DRS Policy and Procedures Manual, [Chapter 15](#), Appeals). Some examples of when this written notification would be required include:

1. The individual’s potentially eligible case is closed without opening a VR case because the student:
 - a) is determined to no longer need Pre-ETS or
 - b) no longer meets the definition of a student with a disability.

TRACKING OF PRE-EMPLOYMENT TRANSITION SERVICES EXPENDITURES

To reiterate, Pre-ETS are only those services and activities listed in section 113 of the Act, as amended by WIOA, and Federal regulation ([34 CFR § 361.48\(a\)](#)). Only these listed services and activities, as well as those VR services needed for eligible students with approved IPEs to participate in and benefit from Pre-ETS, can be paid for with the funds reserved under section 110(d)(1). DARS’ written processes and procedures to track the costs associated with the required, coordination and authorized activities can be located in the Fiscal Policies and Procedures section on the DSA Fiscal Services site.

STAFF TIME:

Due to the requirement that administrative costs may not be paid with the reserve funds, only direct time may be charged to the reserve. Therefore, DARS allocates costs for the time reported by staff in the direct provision of Pre-ETS. Staff use the Cardinal system to document real time used to provide and arrange for the provision of Pre-ETS, not an average, estimate, sampling, or any other method. For the

required Pre-ETS, staff document their time spent directly providing and/or arranging these service activities. This can include staff travel time to and from Pre-ETS activities. For the Pre-ETS coordination activities (listed on page 6 of this manual), staff also document their time spent conducting these four specific coordination activities. This also includes staff travel time to and from the coordination activities. If the agency can demonstrate funds remain for authorized activities, any staff time (including travel) spent on authorized activities is also recorded in Cardinal. Finally, staff may include and allocate any time spent arranging and providing VR services needed for eligible students with approved IPEs to participate in and benefit from Pre-ETS.

Below are examples of how to report time spent providing and/or arranging for the five required Pre-ETS and time spent on the four coordination activities.

Example 1: A counselor provided job exploration counseling off site from 1:00-2:00 p.m. The counselor left the VR office at 12:30 p.m. to travel to the site and returned from providing the service at 2:30 p.m. The counselor would document two hours of "VR Pre ETS-Required" on their time sheet in Cardinal. However, if the counselor spent an additional hour meeting with this student or another student to discuss any services other than Pre-ETS, that additional time could not be counted as Pre-ETS time and would not be documented as "VR Pre ETS-Required" time on the counselor's time sheet in Cardinal.

Example 2: if a counselor spent an hour researching providers and coordinating the availability of Pre-ETS for a student, the counselor would document one hour of "VR Pre ETS-Required" on their time sheet in Cardinal.

Example 3: if a counselor participated in a student's IEP meeting from 10:00-11:00 a.m. and left the VR office at 9:30 a.m. to travel to the school and returned from the meeting at 11:30 a.m., the counselor would document two hours of "VR Pre ETS-Coordination" on their time sheet in Cardinal.

Example 4: If a vocational evaluator spent an hour with a student performing a vocational evaluation (VR assessment service) needed to participate in and benefit from Pre-ETS, the vocational evaluator would document two hours of "VR Pre ETS-Required" on their time sheet in Cardinal.

PE and VR CLIENT COSTS:

Costs associated with Pre-ETS expenditures per PE and VR client are documented as appropriate in the student's individual AWARE service record through Service Authorizations. These costs are included in the Federal Financial Report SF-425. Pre-ETS cost services that are not authorized directly from a student's AWARE case record are also tracked and reported in the SF-425. AWARE tracks Pre-ETS cost services provided to eligible and potentially eligible VR clients through service item (SI) codes (refer to the Pre-Employment Transition Services Fiscal Policy for additional details). Whether a student will receive Pre-ETS cost services is determined based on the student's Pre-ETS needs, DARS in-house Pre-ETS offerings, and comparable benefits. Pre-ETS cost services are arranged and authorized by the student's DARS counselor.

PRE-EMPLOYMENT TRANSITION SERVICES PARTNERS

Collaboration is essential to the successful provision of Pre-ETS. It is through community-wide collaboration that the powerful message is sent to students with disabilities that their community believes in them and their ability to achieve success. Community-wide collaboration also promotes

creative and meaningful provisions of Pre-ETS that strengthens the services provided to students and the outcomes achieved. Key partners with Pre-ETS are students with disabilities and their families, the Virginia Department of Education and the local school divisions, Employment Service Organizations, Centers for Independent Living, workforce development systems, postsecondary education and training providers, community employers, and other community service providers.

DARS also collaborates with the Virginia Department for the Blind and Vision Impaired for the provision of Pre-ETS. Per Federal regulation ([34 CFR 361.24\(e\)](#)), if there is a separate designated State unit for individuals who are blind, the two designated State units (general and blind) must establish reciprocal referral services, use each other's services and facilities to the extent feasible, jointly planned activities to improve services in the State for individuals with multiple impairments, including visual impairments, and otherwise cooperate to provide more effective services, including, if appropriate, entering into a written cooperative agreement. DBVI and DARS entered into a Cooperative Agreement effective July 1, 2014 providing for reciprocal (joint) services, including Pre-ETS and transition services to students and youth with disabilities. Referral to each agency may occur at any point. Criteria for jointly served cases are as follows:

1. the individual meets the eligibility criteria for each agency;
2. each agency has the necessary expertise to address the disability related barriers to employment that the other agency does not have;
3. each agency provides a service that the other agency does not normally provide to the individuals it serves; and
4. each agency's service is a substantial contribution to removing limitations to employment.

Written consent by the individuals being referred or served is required for each agency to exchange, release and obtain information from the other agency. Active communication, shared planning, and coordinated service delivery are critical. Refer to the DRS Policies and Procedures Manual, [Chapter 16, Individuals Jointly Served by DARS and the Department for the Blind and Vision Impaired \(DBVI\)](#) for additional details regarding DARS and DBVI serving an individual concurrently.

MOVING FROM REQUIRED TO AUTHORIZED PRE-EMPLOYMENT TRANSITION SERVICES

The nine authorized activities (detailed on page 7 of this manual) improve the transition of students with disabilities from school to postsecondary education or competitive integrated employment and support the arrangement and provision of the five required Pre-ETS. The authorized activities are critical to ensuring effective delivery of Pre-ETS and furthering opportunities available to students with disabilities. However, these authorized activities may only be provided if DARS can demonstrate through fiscal forecasting that the agency's Pre-ETS reserve is sufficient to make Pre-ETS required and coordination activities available to all students with disabilities needing such services.

Fiscal forecasting is to be done on a regular basis to demonstrate if there is a remaining balance of funds for the provision of Pre-ETS authorized activities. This process includes:

1. Determining the total number of students with disabilities in Virginia, which includes those students eligible for the VR program as well as the total number of students potentially eligible (regardless of whether they have a PE case);

2. Determining the number of students with disabilities in Virginia that need Pre-ETS required and coordination activities, including those currently receiving such services;
3. Calculating the cost for the provision of Pre-ETS required and coordination activities;
4. Calculating the amount of funds reserved for the provision of Pre-ETS that must be set aside for the provision of Pre-ETS required and coordination activities to students with disabilities in need of the services; and
5. Calculating whether the DARS' funds required to be reserved for the provision of Pre-ETS are sufficient to make Pre-ETS required and coordination activities available to all students with disabilities needing such services by subtracting the amount calculated in step 3 from the amount of funds DARS is required to reserve for the provision of Pre-ETS (15 percent of Federal VR allotment).

If the result in step 5 is a negative amount, DARS may not use reserved funds to pay for Pre-ETS authorized activities. If the result is positive, DARS may use the remaining balance of funds for the provision of authorized activities.

APPENDIX A: HELPFUL RESOURCES FOR STAFF AND STUDENTS

<u>Resource</u>	<u>Purpose</u>	<u>Website</u>
WINTAC	Training and technical assistance on Pre-Employment Transition Services	www.wintac.org
Career OneStop	Resource for career exploration, training and jobs	www.careeronestop.org
I'm Determined	Supports students' exploration of their strengths, interests, preferences and needs (especially refer to the One Pager)	www.imdetermined.org
Virginia's Career and Technical Education	Supports career and technical and occupational-technical preparation by providing resources for curriculum development	www.cteresource.org
Think College	National organization dedicated to developing, expanding, and improving inclusive higher education options for people with intellectual disability	https://thinkcollege.net/
Zarrow Center for Learning and Enrichment	Facilitates student-directed educational, employment and adult living outcomes for individuals with disabilities	www.ou.edu/education/centers-and-partnerhsips/zarrow.html
Rehabilitation Research and Training Institute	Setting goals	http://rrti.org/documents/FinalVersionModule1.pdf (additional information available via this site can be explored at http://rrti.org/about.php)
MN Programs of Study	Activities to support job searching and work-readiness	http://www.mnprogramsofstudy.org/mnpos/toolkit/advisers/job-classroom.html
Carnegie STEM Girls	Activities, resources, and links designed to get teenagers excited about science, technology, engineering, and math (STEM) careers	http://carnegiestemgirls.org
CDM CareerZone	Supports students with learning about their career self and jobs	https://cdmcz.headed2.com/index

Next Gen Personal Finance	Fun way of teaching budgeting (suggestion: replace the beans with candy so students can eat them; can be combined with one of the lessons from Virtual Job Shadow)	https://www.ngpf.org/blog/activity/looking-for-a-great-hands-on-budgeting-activity/
O*NET	Interest exploration	https://www.onetonline.org/explore/interests
My Next Move	Explore interests, search careers, and browse industries	https://www.mynextmove.org/
Skills to Pay the Bills	Curriculum developed by ODEP focused on teaching work-readiness skills to youth, including youth with disabilities	https://www.dol.gov/odep/topics/youth/softskills/
University of Kansas Research and Training Center on Independent Living	Free online training on how to request college accommodations and self-advocate	www.accesstosuccess.ku.edu
National Association of the Deaf	Self-determination video in American Sign Language	https://dcmp.org/learn/static-assets/F02_02A.mp4
Rochester Institute of Technology National Technical Institute for the Deaf- Explore Your Future	Six-day career exploration program at RIT for college-bound deaf and hard-of-hearing high school students	www.rit.edu/NTID/EYF
Gallaudet University- Discover Your Future and Bison Brainiacs	Summer learning and experiential opportunities designed for deaf and hard-of-hearing students	http://www.gallaudet.edu/youth-programs/summer-youth-camps
Youth.gov	Features prevalent youth topics, evidence-based and innovative programs, and more	www.youth.gov
The Learning Community- I Want to Work workbook and partner guide	Workbook to support students with identifying employment of interest, needed supports and more	http://www.learningcommunity.us/Reading%20Room/documents/Iwanttowork-Workbook02-28-12.pdf and www.learningcommunity.us/Reading%20Room/documents/Iwanttowork-PartnerGuide02-28-12.pdf
Helen Sanderson Associates	International resources for person-centered practices	www.helensandersonassociates.co.uk/

VCU Center on Transition Innovations	Provides evidence-based resources and information along with emerging practices	https://centerontransition.org/
PEATC	Resources for families, schools and communities to support success in schools and community life	www.peatc.org
DARS Informed Choice and Employment guide	Guide to supporting informed-decision making about employment	https://www.vadars.org/essp/downloads/informed%20Choice%20and%20Employment-%20Sept%202017.pdf
National Collaborative on Workforce and Disability for Youth (NCWD/Youth)	Numerous youth-focused resources, developed in collaboration with ODEP, including the Guideposts for Success and extensive information related to Career Development, Professional Development, and Youth Development and Leadership	https://www.dol.gov/odep/resources/NCWD.htm
VCU Rehabilitation Research and Training Center	Materials and information that facilitate employment and job retention	https://vcurrtc.org/resources/
Bureau of Labor Statistics Student Resources	Career exploration, economy at a glance, games, occupational videos, etc... for K-12 students	https://www.bls.gov/k12/students.htm
National Clearinghouse of Rehabilitation Training Materials	Repository for training resources in VR and education	https://ncrtm.ed.gov/
Virtual Job Shadow	Video-based career planning and interactive tools to help students develop career paths based on choice	https://www.virtualjobshadow.com/
<i>Social Skills Activities for Secondary Students with Special Needs</i> by Darlene Mannix	Activities to support students with building the social skills they need to interact effectively with others and learn how to apply these skills to various real-life settings, situations, and problems	N/A (each office has a hard copy)
<i>Life Skills Activities for Secondary Students with Special Needs</i> by Darlene Mannix	Lessons for teaching basic life skills to adolescents with special needs to support achievement of independence and success in everyday life	N/A (each office has a hard copy)

Websites suggested by WINTAC:

			
			
			
			
			
			
			

 <p>NCSET <i>Creating Opportunities for Youth With Disabilities to Achieve Successful Futures</i></p>	 <p>NATIONAL YOUTH EMPLOYMENT COALITION</p>	
		