



Discussion Prompts for Implementation of an Interagency Agreement - Local Level

This document was developed to provide local teams with discussion prompts to help focus their conversation on what things to consider in developing a local interagency agreement or in implementing the state agreement at the local level if the state only has a state agreement.

The document is divided into sections and has a place for both the Local Education Agency and the Vocational Rehabilitation Agency to document their response to each of the prompts. The responses to the prompts can then be used to build the contents of the Local Level Interagency Agreement as well as process for the implementation and evaluation of the agreement.

Contents

Purpose of Transition-Related Requirements in WIOA and SEA Agreement	3
Discussion Prompts	3
Local Education Agency (LEA)	3
Vocational Rehabilitation (VR)	3
Consultation and Technical Assistance	4
Discussion Prompts	4
Education	4
Vocational Rehabilitation	4
Transition Planning	5
Discussion Prompts	5
Education	5
Vocational Rehabilitation	5
Roles and Responsibilities	8
Discussion Prompts	8
Education	8
Vocational Rehabilitation	8
Outreach and Identification	10
Discussion Prompts	10

Education	10
Vocational Rehabilitation	10
Subminimum Wage (Section 511)	11
Discussion Prompts	11
Education	11
Vocational Rehabilitation	11
Dispute Resolution	15
Discussion Prompts	15
Education	15
Vocational Rehabilitation	15

Purpose of Transition-Related Requirements in WIOA and SEA Agreement

Discussion Prompts	Local Education Agency (LEA)	Vocational Rehabilitation (VR)
<p>Why are the WIOA amendments to the Rehabilitation Act important to a local education agency (LEA)?</p> <ul style="list-style-type: none"> ● New services for SWD ● New population served ● New documentation requirements 		
<p>How will the final regulations implementing the WIOA amendments to the Rehabilitation Act affect transition planning in the IEP?</p> <ul style="list-style-type: none"> ● Indicator 13 ● Post-Secondary Goal Development ● Summary of Performance (SOP) ● Services for students with the most significant disabilities 		
<p>How will transition services be implemented locally?</p> <ul style="list-style-type: none"> ● Review SEA agreement ● Prioritize/align services ● Shared accountability ● Joint responsibility ● Follow-up/monitor 		

Consultation and Technical Assistance

(to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services)

Discussion Prompts	Education	Vocational Rehabilitation
<p>Who will receive consultation and technical assistance?</p> <ul style="list-style-type: none"> ● Teachers (SpEd, GenEd, Career Tech Ed) ● School admin/counselors 		
<p>What will it include?</p> <ul style="list-style-type: none"> ● Processes for outreach, VR eligibility, scope of VR services, including IPE services, such as individualized transition services ● Pre-employment transition services, referrals ● Other? 		
<p>When will it be provided?</p> <ul style="list-style-type: none"> ● Annually or spring/fall ● IEP or 504 meetings ● Teacher in-service ● Other planned events 		

Discussion Prompts	Education	Vocational Rehabilitation
<p>What method(s) will VR use?</p> <ul style="list-style-type: none"> ● Informational sessions ● Face to face meetings ● Phone Calls/Video Conferencing ● Brochures, flyers, videos 		

Transition Planning

(by VR and educational agency personnel that facilitates completion of Individualized Education Programs (IEPs))

Discussion Prompts	Education	Vocational Rehabilitation
<p>How is transition planning coordinated in the IEP?</p> <ul style="list-style-type: none"> ● Are pre-employment transition services being incorporated into the IEP and Indicator 13? ● Is the IEP and IPE coordinated for VR eligible students? ● When will VR counselors be invited to attend IEP meetings? ● Does VR participate in parent/teacher nights? ● What is the process for obtaining parental consent prior to VR participation in the IEP meeting? 		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● How will the VR counselor ensure their availability to attend the IEP meeting (in person or through alternative means)? 		
<p>How will VR be granted access to students?</p> <ul style="list-style-type: none"> ● How will VR or another entity providing pre-employment transition services obtain access to potentially eligible students during the school day? ● How will pre-employment transition services be coordinated and arranged with the LEA (i.e. set schedule, daily, weekly, etc.)? ● What student referral and/or parental consent forms need to be obtained before potentially eligible students may receive services? 		
<p>How will the LEA share information with VR, and/or other entities to ensure coordinated transition planning, and timely service provision?</p> <ul style="list-style-type: none"> ● General student information ● Student records, progress reports, etc. ● Other 		
<p>How will transition services, including pre-employment transition services be coordinated for students with disabilities who are not receiving services through IDEA?</p>		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● 504 Coordinator ● HS Counselor ● Any difference in student access? 		
<p>How will services for students with disabilities be coordinated with non-educational agencies?</p> <ul style="list-style-type: none"> ● Juvenile justice ● Youth in Foster Care ● Other 		
<p>How can the LEA strengthen partnerships with the VR agencies for the blind in order to serve students with visual impairments and blindness more effectively?</p> <ul style="list-style-type: none"> ● Is there an LEA liaison assigned to local VR offices? ● Does the LEA understand the services that may be provided? ● How are referrals made to the VR agency that serves persons who are VR agency that serves persons who are blind? 		
<p>How will cross-training between VR and Education be coordinated and provided?</p> <ul style="list-style-type: none"> ● Should training include requirements of both IDEA and Rehabilitation Act and the implementing regulations? 		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● Should training include examples of coordination of IEP and IPE services? ● Should training include effective practices and relationship building? ● Should training include information sessions for students and families? 		

Roles and Responsibilities

(along with financial responsibilities of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services)

Discussion Prompts	Education	Vocational Rehabilitation
<p>What is the LEA’s role in the provision of transition services and pre-employment transition services?</p> <ul style="list-style-type: none"> ● Have IDEA transition services been defined? ● Where are the IDEA transition-related services that are currently being provided by the LEA to students with disabilities identified? 		
<p>What is VR’s Role in the provision of transition services and pre- employment transition services?</p> <ul style="list-style-type: none"> ● Were VR transition services defined? ● Were VR pre-employment transition services defined? 		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● Who will provide pre-employment transition services to VR eligible students (VRC directly, VR contracted provider/vendor/school, or a combination)? ● Who will provide pre-employment transition services to students who are potentially VR eligible (VRC directly, VR contracted provider/vendor, school, a combination, other entity)? ● How does the agreement address the purpose, customary service, and eligibility criteria in determining who is responsible? ● How will pre-employment transition services be provided (i.e. individual basis basis, group setting, or a combination)? 		
<p>How will VR and the LEA distinguish between IDEA transition services, VR pre-employment transition services, and VR transition services?</p> <ul style="list-style-type: none"> ● What discussions need to occur at the local level to ensure services are not duplicated or supplanted? ● Have the similar services that will be provided by each agency been identified and responsibilities assigned? 		
<p>What criteria will be used to determine who is responsible to pay for a similar service that both entities can provide under their respective laws?</p>		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● Has the agreement clearly identified who will pay for specific services? ● Who will be the point of contact in determining if the purpose of the service is related to an employment outcome or education attainment; or if it is considered a special education or related service? ● Who will determine at the local level if these services are customarily provided by the school under IDEA part B, or by the VR program? ● How will the VRC communicate with the LEA if the student is eligible for transition services under IDEA; or services, including transition services and pre-employment transition services, under the VR program? ● What is the method for defining the financial responsibility of each agency in order to ensure that all services that are needed to ensure FAPE are provided? ● What are the conditions, terms and procedures under which the LEA shall be reimbursed by other agencies? 		

Outreach and Identification

Discussion Prompts	Education	Vocational Rehabilitation
<p>How does VR and the LEA work together to coordinate outreach to students and</p>		

Discussion Prompts	Education	Vocational Rehabilitation
<p>families regarding VR services?</p> <ul style="list-style-type: none"> ● Was the information provided as early as possible, and did it include at a minimum: description of purpose of VR, eligibility requirements, application procedures and scope of services? ● Did the outreach activities include attendance at IEP and transition planning meetings, career fairs, back to school nights and other activities? ● How did the LEA ensure students with disabilities who may benefit from VR services, including pre-employment transition services, were identified? ● Did VR outreach activities include IEP students, 504 students and other students and youth with disabilities? 		

Subminimum Wage (Section 511)

Discussion Prompts	Education	Vocational Rehabilitation
<p>How will the LEA provide work experience opportunities for students with the most significant disabilities seeking subminimum wage employment after HS exit, since schools are prohibited from entering into a contract or making other arrangements with a 14c certificate holder for an individual who is 24 years of age or younger which the work is compensated at subminimum wage?</p>		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● What work experience opportunities will be provided for students who were released for a portion of the school day last year to work in a sheltered workshop, or participated in work experience for subminimum wages? ● If a student requires line of site supervision, and the LEA has limited staff capacity to supervise a student in the community, what alternative methods of service delivery and/or supervision are available? ● What are the implications for an IEP team, in terms of transition planning, when the IEP team, including the parents and student are in agreement that subminimum wage employment is a realistic post-secondary employment goal? 		
<p>Since a youth with a disability is required to apply for the VR program before they may be employed at subminimum wage employment; when should the LEA consider referring a student with a disability known to be seeking subminimum wage employment to the VR program?</p> <ul style="list-style-type: none"> ● For a pre-employment transition services referral? ● For application for the VR program? <p>Has the LEA documented the receipt of transition services under IDEA?</p>		

Discussion Prompts	Education	Vocational Rehabilitation
<p>What documentation does the LEA provide to VR for a student seeking subminimum wage employment?</p> <ul style="list-style-type: none"> ● What are options for obtaining consent for release of information? ● What will the required documentation look like? ● Does VR need information regarding the type of transition services received and the student’s performance in those activities? ● Should VR receive a copy of the student’s Summary of Performance (SOP)? If yes, when, since this is typically not completed until after the student graduates or exits school? ● How will the exchange of all this documentation be coordinated, and has the LEA or VR identified a point of contact? ● How will the LEA ensure VR is provided with the appropriate documentation within the specified time frame? ● How will the LEA ensure any documentation provided by the LEA to VR will comply with confidentiality requirements of the Family Educational Rights and Privacy Act (FERPA), 34 CFR 99.30 and 99.31, and IDEA? 		

Discussion Prompts	Education	Vocational Rehabilitation
<ul style="list-style-type: none"> ● Has the LEA identified where they will maintain copies of this required documentation consistent with the requirements of 2 CFR 200.333? ● Has the LEA designated a point person to do all of the above? Will it be handled individually by each case manager as appropriate, or will the school designate one primary point of contact? ● Who is responsible for collecting this information for students who received transition services under IDEA but have already graduated/exited school? 		

Dispute Resolution

Discussion Prompts	Education	Vocational Rehabilitation
<p>What are the conditions, terms and procedures for resolving interagency disputes?</p> <ul style="list-style-type: none"> ● What procedures can the LEA initiate including, a mechanism to secure reimbursement from other agencies and implementation of the agreement? ● Nothing under title I of the Rehabilitation Act shall be construed as reducing a LEA's or any other agency's obligation under the IDEA to provide or pay for transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education (FAPE) to children with disabilities. 		

The content of this document was jointly developed by the Workforce Innovation National Technical Assistance Center (WINTAC), a project funded under # H264G15005 of the U.S. Department of Education (Department) and The National Technical Assistance Center on Transition (NTACT), Charlotte, NC, funded by Cooperative Agreement Number H326E140004 with the U.S. Department of Education, Office of Special Education and Rehabilitative Services (OSERS). The information contained in this document does not necessarily represent the position or policy of the Department and no official endorsement should be inferred.