

VR Transition Services to Groups for Students and Youth with Disabilities

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Disclaimer

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Learning Objectives



Increased knowledge on the VR Transition Services to Groups Authority and who may benefit from those services.



Increased knowledge of the target population, statutory requirements, and allowable costs.



An understanding of the types of group activities that can be provided to students and youth under the services to groups authority.



The ability to identify when an agency may want to use the Services to Groups authority and considerations for implementation.

VR Continuum Of Services

Pre-Employment Transition Services

- earliest set of services for potentially eligible or eligible swd
- short term in nature to help identify career interests
- specific set of five required activities provided directly to swd under Pre-Employment Transition Services
- States must reserve a minimum of 15% of federal funds to provide Pre-Employment Transition Services

Transition Services

- available for eligible swd through an IPE
- help further develop and pursue career interests through post-secondary ed, vocational training, job search, job placement, job retention, job follow-up and job follow-along services

Employment Related Services

- typically provided once eligible swd have further identified, developed and pursued career interests, offered through transition services, and are pursuing specific employment outcomes through an IPE
- assist in preparing for, securing, retaining, advancing in or regaining an employment outcome

VR Transition Services

Pre-Employment Transition Services

(34 CFR § 361.48(a))

Only for **students with disabilities** in a recognized educational program

VR application and IPE are **not required**

The 5 required Pre-ETS services can be provided in a group setting or individually.

Individualized Transition Services

(34 CFR § 361.48(b)(18))

For **students and youth** with disabilities

VR application and approved IPE **are required**

Any allowable VR service, including pre-employment transition services, can be provided, such as job coaching, job placement, transportation, etc., under an IPE

Group Transition Services

(34 CFR § 361.49(a)(7))

For **groups of students and youth** with disabilities

VR application and IPE are **not required**

Services are not individualized, but benefit a group. Participation in the VR program is not required. Services may include group tours, employer visits, career fairs, etc.

What Is The Transition Services To Groups Authority?

Section 103(b) of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by the Workforce Innovation and Opportunity Act (WIOA) authorizes vocational rehabilitation services provided for the benefit of groups of individuals with disabilities, including transition services for students and youth with disabilities, who may not have applied for or been determined eligible for vocational rehabilitation services. (Section 103(b)(7) of the Rehabilitation Act and 34 C.F.R. § 361.49(a)(7)).

Who May Benefit from Transition Services Under the Services to Groups Authority?

These specific transition services are to benefit a group of students with disabilities or youth with disabilities and are not individualized services directly related to an individualized plan for employment (IPE) goal.



Who May Benefit From Transition Services Under The Services To Groups Authority?

(continued)

Students with disabilities or youth with disabilities, regardless of whether they have applied for or been determined eligible for the VR program, may receive generalized transition services under the services to groups authority.



Youth with disabilities enrolled in the WIOA Youth Program, who may have not yet applied or been determined eligible for VR services.

Target Population

The VR agency should consider outreach to the following underserved populations of youth/students with disabilities who are:

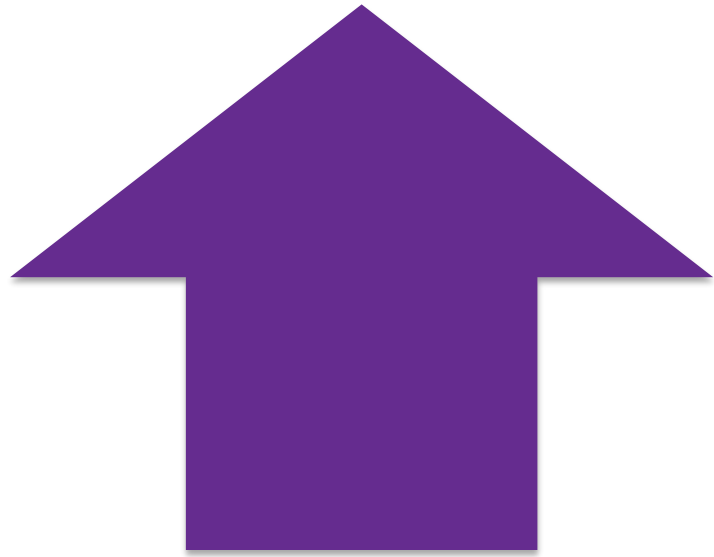
- Justice Involved
- In Foster Care
- In Immigrant Communities
- From Native/Indigenous Populations
- Homeless youth
- Living in halfway houses/treatment centers
- LGBTQ+ identified
- In receipt of SSI
- In rural communities
- Other marginalized communities (e.g., Hispanic and African American communities)

VR Working In Partnership For Students And Youth With Disabilities

In providing these transition services under the services to groups authority, a vocational rehabilitation counselor works in concert with:

- Educational agencies;
- Providers of job training programs;
- Providers of services under the Medicaid program under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);
- Entities designated by the State to provide services for individuals with developmental disabilities;
- Centers for independent living (as defined in section 702 of the Act);
- Housing and transportation authorities;
- Workforce development systems;
- Businesses and employers; and
- Other partners (Child Protective Services Department of Correction/Juvenile Justice, and other social service agencies).

Transition Services To Groups - Working In Partnership



Question: Must students or youth with disabilities be involved with the entities (referenced on the previous slide) with which the VR agency is working in concert to provide transition services to groups?



Response: Students or youth with disabilities may identify themselves directly to the VR agency, which may work in concert with the entities listed to provide transition services to benefit groups of students and youth. This could occur if the VR agency advertises and offers a career day activity to groups of students and youth with disabilities who may not have applied or been determined eligible for VR services, but who need to register as a group for the event.

Examples Of Services Provided Under Transition Services To Groups Authority

Services may include, but are not limited to:

Group tours of universities and vocational training programs;



Employer or business site visits to learn about career opportunities;



Career fairs coordinated with workforce development and employers; and



Other general services applicable to groups of students with disabilities and youth with disabilities.

Examples Of Group Tours Of Universities And Vocational Training Programs

May include -

- Visiting a disability support services office, coordinating a general orientation visit, touring dorm facilities, etc.;
- Touring a job corps campus, providing hands-on introductions to areas such as welding, autobody, etc.;
- Touring university programs, including inclusive college programs for students with intellectual disabilities such as Comprehensive Transition Programs (CTP), or Transition and Post secondary Programs for Students with Intellectual Disabilities (TPSID) programs;
- Participating in events like College Campus Days coordinated by the college/university;
- Coordinating and participating in financial aid events like FAFSA Frenzy, etc.

Examples Of Employer Or Business Site Visits To Learn About Career Opportunities

May include -

- Scheduled tours with local businesses to visit their worksite to learn about the range of jobs offered through that company.
 - (e.g., tech companies, hospitals, distribution centers, airports, and other industries aligned with the local labor market demand, etc.)
- Coordinated employer speaker visits to discuss on-boarding expectations, employer/workplace expectations, etc.

Examples Of Career Fairs Coordinated With Workforce Development And Employers

May include -

- Mock interviews;
- Resume writing;
- Reverse job fairs; and
- On-line resume preparation and job applications.

Note: *These are not individualized services. Rather, they are general services provided to a group of students or youth with disabilities.*

Examples Of Other General Services That May Be Provided Under This Authority

May include -

- Overview of adult public programming and supports (e.g., VR, WIOA Adult/Youth programs, TANF, SNAP, CILs, etc.);
 - Using public transit;
 - Financial literacy related to working (e.g., opening a bank account, direct deposit, financial fitness fairs, etc.);
 - Overview of work incentives (e.g. SEIE, PASS), use of ABLE Accounts to help save for post-secondary education/training/Independent Living; and
 - Healthy relationships (general information regarding maintaining mental health, positive social relationships, and relationship boundaries in the workplace)
- If the transition services benefit a group of students with disabilities or youth with disabilities and are not individualized, but generalized in nature and scope, they would be permissible. If transition services are individualized and directly related to an IPE, they would not be permissible transition services under the services to groups authority.

Documentation, Tracking and Reporting Requirements

The RSA-911 does not collect information on services to groups recipients. As such, there are no supporting documentation or reporting requirements for transition services to groups for the RSA-911 report.

Documentation and Reporting of VR Funds Expended under the Transition Services to Groups Authority

Costs charged under this authority (transition services to groups of students and youth with disabilities in accordance with Section 103(b) of the Rehabilitation Act and 34 C.F.R. § 361.49(a)(7)), must be reported on the RSA-17, line 40, Services to Groups, g. Transition Services to Students and Youth.

****Reminder:** These costs may not be charged to the funds reserved for the provision of pre-employment transition services.*

Documentation and Reporting of VR Funds Expended on Transition Services to Groups Authority (Continued)

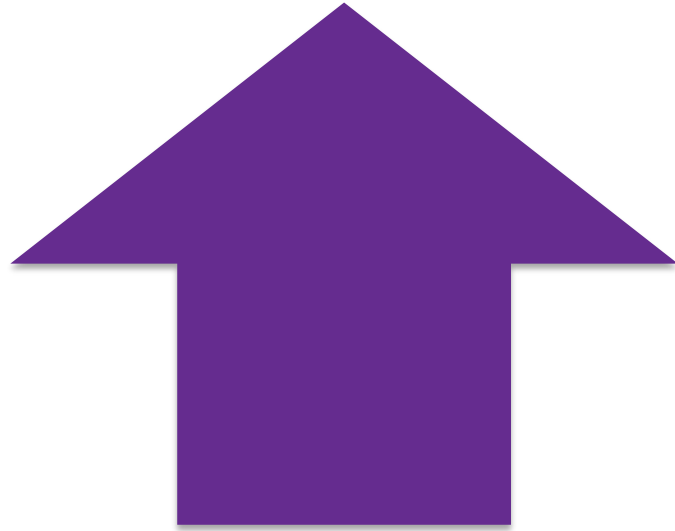
Additionally, VR agencies must assure compliance with 2 C.F.R. § 200.302 Financial management.

(a) Each State must expend and account for the Federal award in accordance with State laws and procedures for expending and accounting for the State's own funds. In addition, the State's and the other non-Federal entity's financial management systems, including records documenting compliance with Federal statutes, regulations, and the terms and conditions of the Federal award, must be sufficient to permit the preparation of reports required by general and program-specific terms and conditions; and the tracing of funds to a level of expenditures adequate to establish that such funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. Please also reference 2 C.F.R. § 200.450

If funds are expended on transition services to groups, the VR agency should follow Federal requirements, as well as any State requirements related to consent and the verification/documentation of such consent.

Allowable Costs

* Remember, the cost of services provided through the services to groups authority must not be charged to the funds reserved for the provision of pre-employment transition services.



Question: What type of costs are allowable under the transition services to groups authority?

Response:

- Group registration costs for a group of students/youth to participate in college or university tours or career fairs.
- Speaker costs for a group of students/youth to participate in a financial fitness fairs, work incentives workshops, orientation to community resources, etc.
- Group registration costs for a group of students/youth to attend a workshop on financial empowerment.

What Costs May Be Allowable?

- VR agencies may assist individuals with disabilities to access generalized transition services through the VR service for groups of individuals with disabilities requirements in 34 C.F.R. § 361.49(a)(2) and (a)(3)).

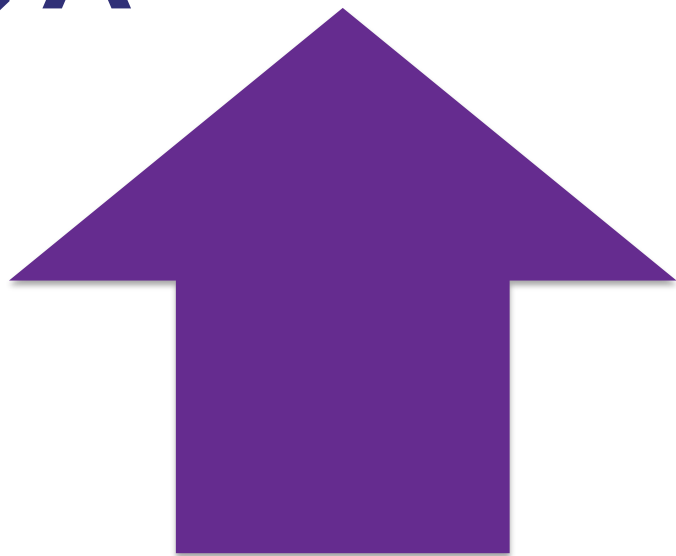
Specifically - § 361.49 Scope of vocational rehabilitation services for groups of individuals with disabilities.

(a) The designated State unit may provide for the following vocational rehabilitation services for the benefit of groups of individuals with disabilities:

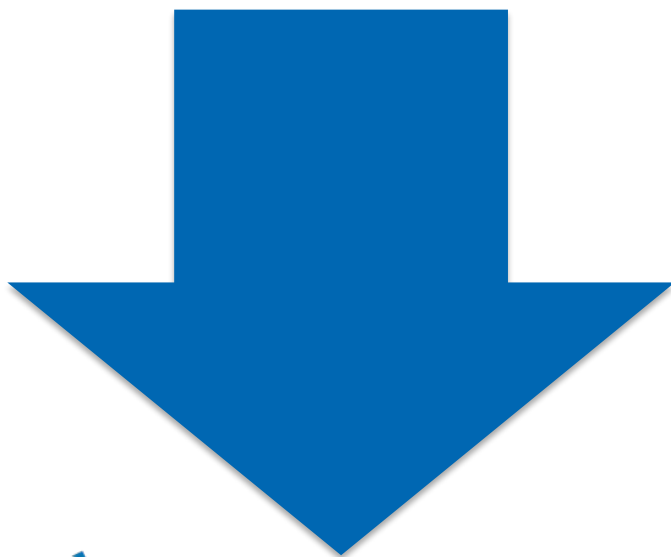
(2) Telecommunications systems that have the potential for substantially improving vocational rehabilitation service delivery methods and developing appropriate programming to meet the particular needs of individuals with disabilities, including telephone, television, video description services, satellite, tactile-vibratory devices, and similar systems, as appropriate.

(3) Special services to provide nonvisual access to information for individuals who are blind, including the use of telecommunications, Braille, sound recordings, or other appropriate media; captioned television, films, or video cassettes for individuals who are deaf or hard of hearing; tactile materials for individuals who are deaf-blind; and other special services that provide information through tactile, vibratory, auditory, and visual media.

Q & A

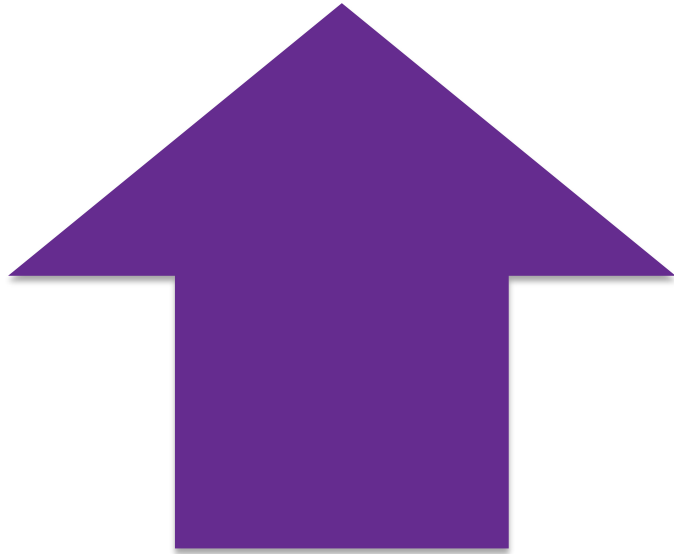


Question: Are Foreign Language Interpreters an allowable cost to be charged under the transition services to groups authority?



Response: These services are not generalized transition services, rather they are administrative costs for the VR agency to ensure access to services.

Q & A (continued)



Question: What costs are unallowable under this authority?



Response: Any service or service-related cost that is not authorized under the Rehabilitation Act and in accordance with 34 C.F.R. § 361.49 and that is an individualized VR service provided to a VR participant under an IPE are not allowable costs under the services to groups authority.

Collaboration

- Collaboration may lead to referrals of youth and students with disabilities to other beneficial programs such as youth programs funded under Title I of WIOA. Such programs include five new program elements:
 1. Financial literacy instruction;
 2. Entrepreneurial skills training;
 3. Provision of local labor market and employment information;
 4. Activities that help youth transition to postsecondary education and training; and
 5. Education offered concurrently with workforce preparation activities and training for a specific occupation or occupational cluster.

Collaboration Q & A



Question: How might the provision of transition services to groups for students and youth with disabilities authorized by the Rehabilitation Act expand collaboration with WIOA Youth/other partners?

Response: Some transition services are provided to groups of students and youth with disabilities prior to or after submitting an application for VR services.

While these group services are not individualized or specifically related to the individual needs of the student or an approved IPE, they are beneficial and increase the student's opportunities to participate in activities, such as group tours of universities and vocational training programs, which may include:

- DOL programs such as Job Corps and Youth Build;
- Employer site visits to learn about career opportunities; and
- Career fairs coordinated with workforce development and employers.

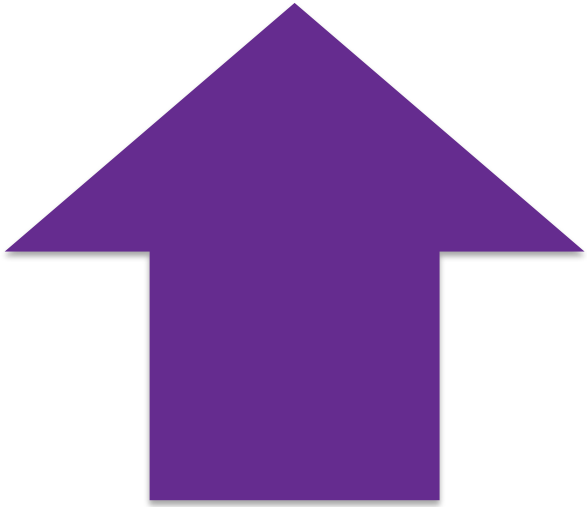
DOL Youth Programs

- Two well-known youth programs funded by DOL are the Job Corps and YouthBuild. Each of these programs integrates vocational (including classroom and practical experiences), academic and employability skills training designed to prepare youth for stable, long-term, high-paying employment.
 - Job Corps programs offer career technical training in over 100 career areas.
 - YouthBuild programs focus on the construction trades.

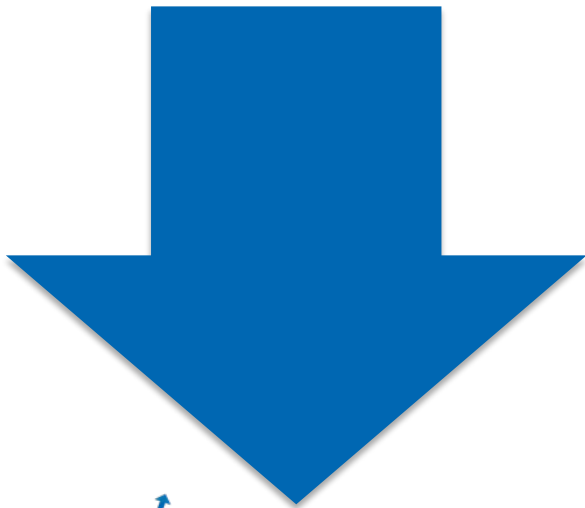
DOL Youth Programs (Continued)

- Some students are eligible to receive youth services from DOL programs. These youth must be age 14–21, attending school, from a low-income family, and they must meet one or more additional conditions, such as being an English language learner, homeless, an offender, or others.
- For more information on these programs, see Collaboration Opportunities: [WIOA Youth and Vocational Rehabilitation Programs](#).

Coordination Of VR Transition Services For Students And Youth



Question: How can transition services to groups be coordinated with Pre-Employment Transition Services? For example, can you do a business tour with a combined group of students with disabilities in receipt of pre-employment transition services, along with a group of youth being served under the services to groups authority, so long as you cost allocate and document appropriately those students being served under pre-employment transition services, along with those served under the services to groups authority?



Response: Yes. An activity that meets one of the required activities under pre-employment transition services (e.g., job exploration) may also meet the needs of a group of youth with disabilities. Therefore, so long as you cost allocate and document those students receiving pre-employment transition services and cost allocate the provision of transition services to groups, this may be accomplished.

Coordination Of VR Transition Services For Students And Youth (Continued)

- **Example:** In working with your WIOA Youth partners, they have a group of youth who do not currently meet the definition of a student with a disability, as they are under 24 but not currently enrolled in an education program and want to partner with the VR agency around providing a worksite tour.

As such, the WIOA Youth partner refers this group of youth with disabilities to participate in a general worksite tour that the VR agency arranged for a student with a disability as a work-based learning experience under the auspices of Pre-Employment Transition Services. The VR agency may provide the generalized transition service under the services to groups authority to a group of youth with disabilities; however, the cost would need to be cost allocated and charged to Title I (basic support/110 funds), and only the cost for the one student with a disability participating in a specific worksite tour as a pre-employment transition service to explore his or her interests may be charged to the funds reserved for the provision of pre-employment transition services.

Coordination Of VR Transition Services For Students And Youth (Continued 2)

- **In the previous slide, the VR Agency will use both authorities in the regulations:**
 - The use of the Services to Groups Authority will be used in order to include the youth with disabilities who do not meet the definition of a student with a disability that were referred to VR by their WIOA youth partners for a generalized transition service, and
 - The agency will document the work-based learning experience for those students with disabilities who are participating in pre-employment transition services either as a potentially eligible and/or a VR eligible student with a disability with an IPE. (Aside: Transportation services may only be funded under an IPE for eligible students in need of such services to participate in pre-employment transition services).
 - The students with disabilities participating in the WBLE as a pre-employment transition service will be documented in the case record in order to report each student served and each pre-employment transition service provided, and
 - The costs associated with the WBLE will be charged to the reserve only for the students in receipt of a specific pre-employment transition service, in accordance with their established policy,
 - While the youth with disabilities participating in the general worksite tour, would not be documented or reported in the RSA-911, the cost associated with the youth who participate in the generalized transition service would need to be cost allocated to Title I (basic support/110 funds), and charged under the services to groups authority, and reported on the RSA-17.

Considerations For VR In Determining When To Provide Transition Services To Groups

- Identification of Need for these services
 - What does the data tell you?
 - What is currently provided under pre-employment transition services - for students with disabilities and VR transition services for youth?
 - Are there gaps in -
 - Those who are accessing services?
 - Services available?
- Is the Agency under an Order of Selection (OOS)? Please also reference 34 C.F.R. § 361.36 (e) (3).
- How are generalized transition services under the services to groups authority described in policy and procedures?
- Who determines whether the student or youth with a disability should receive such services under transition services to groups?
 - Why would they not receive similar services as a potentially eligible student with a disability?
 - Why would they not receive similar services as a VR applicant or eligible youth with a disability under an IPE and in receipt of VR transition services?

Additional Considerations For VR In Executing The Transition Services To Groups Authority

State Plan Attachment for Coordination with Education Officials?

Interagency Agreement with VR and the State Education Agency?

How is this described for staff, providers, educators, students, and families to understand the availability of services and when to apply for VR?

Don't forget to complete your evaluation

Thank You

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