

*This document is intended to be a guide for the development of policies and procedures for VR agencies in the provision of Pre-Employment Transition Services.*

## 1. Purpose

- a. Policies and procedures should clearly outline the purpose and intent of pre-employment transition services.
  - i. Include the distinction between pre-employment transition services and State Vocational Rehabilitation (VR) transition services and other VR employment related services.
- b. Policies and procedures should clearly specify the state's age range for students with disabilities that will be reported on the RSA 911 (Data Element 74).
  - i. Include, if there are two VR (General and Blind) agencies in a state, that both agencies agree on the same state age range.

## 2. Target Population

- a. Policies and procedures should describe **who** can receive pre-employment transition services and **how** this is documented for:
  - i. Students with disabilities who are either
  - ii. Eligible or
  - iii. Potentially eligible

## 3. Definitions

- a. Pre-employment transition services
  - i. Describe these services and how they are distinct from other VR services.
  - ii. Describe how these services are the first step along the continuum of services that VR may provide to students with disabilities.
- b. Student with a disability
  - i. Describe how the student meets each component of the definition of a student with a disability:
    1. The state's age range for students with disabilities receiving pre-employment transition services.

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- a. Include rationale for agreed upon minimum/maximum age range. (e.g., based on State Department of Education age range for IDEA transition planning, is it up to 22nd birthday, etc.)
  2. Enrollment in a recognized education program (include description of secondary, post-secondary, and other recognized education programs, and guidance for gap year).
  3. Disability (individual in receipt of services under IDEA by the local educational agencies (LEA), or an individual with a disability for the purposes of section 504 of the Rehabilitation Act, as amended by WIOA).
- c. Youth with a disability
  - i. Provide the definition of youth with a disability and draw the distinction of a student with a disability as the only population that may receive pre-employment transition services.
  - ii. Provide a link to the agency's policy and procedures section that describes how the VR agency provides transition services available to youth with disabilities.
- d. VR Transition Services
  - i. Provide the definition of VR transition services to make the distinction between pre-employment transition services and individualized VR transition services (provide a link to the section of the agency's policy and procedures on this section).
- e. Individualized VR services
  - i. Provide the definition of other individualized services that may be provided to VR eligible students and youth with disabilities under an IPE and when these services would be provided.

## 4. Pre-Employment Transition Services and Statewide Availability

- a. Required Pre-Employment Transition Services
  - i. Describe the five required activities that the VR agency must make available to all students with disabilities who may need such services.
  - ii. Making Services Available Statewide

1. Identify how VR is making all five required pre-employment transition activities available to all students with disabilities who may need them statewide, including those students who are potentially eligible for VR services, as well as those who have applied, been determined eligible, and have an approved individualized plan for employment.
  2. Describe differences in the service modalities, level, or availability of pre-employment transition services in different parts of the state (e.g., unavailable CRPs in rural areas of the state, level of LEA coordination or cooperation) and what strategies the VR agency is employing to address any deficits to ensure that all five required pre-employment transition services are available statewide.
- iii. Service Provision and Delivery
1. In-house (directly by VR staff)
    - a. Describe how and to what extent VR staff provide the five required pre-employment transition services, including the curriculum or tools staff may use to deliver these services.
    - b. Describe how each required service for each individual student with a disability will be documented in the agency's case management system and accurately reported in the RSA 911.
    - c. Describe how the proportional amount of Federal expenditures for staff providing the five required services are assigned to the Federal funds reserved for the provision of pre-employment transition services and reported on the RSA-17.
  2. Purchased services
    - a. Describe how the VR agency identifies students to be served and pre-employment transition services to be provided, arranged, and purchased (e.g., Third party cooperative arrangements (TPCA), fee for service agreements, contracts, etc.).
    - b. Describe how each of the five required services for each individual student with a disability served will be documented in the agency's case management system and accurately reported in the RSA 911 for all mechanisms through which the VR agency purchases or procures

pre-employment transition services. This description should include how the agency ensures that expenditures for each required pre-employment transition service provided for each student with a disability is documented and reported in accordance with the RSA-911 reporting requirements.

- c. Describe how the VR agency will monitor and evaluate purchased and procured services provided to each student in receipt of such services.
- d. Describe how the Federal costs associated with the provision of the five required services are tracked and reported on the RSA-17. The RSA-17 requires all Federal pre-employment costs reported on line B.15. Additionally, line G.38.a. of the RSA-17 requires the agency report the expenditures incurred for the provision of pre-employment transition services provided directly by VR Agency personnel only (required and coordination). Line G.38.a. does not report the purchased service costs when pre-employment transition services are provided via a VR Agency purchase.

### 3. Group setting/individual basis

- a. Describe whether services are provided in a group setting as well as on an individual basis and how this is determined and documented.
- b. Consider including services to groups and how these services under 34 C.F.R. § 361.49 (a)(7) are not considered pre-employment transition services and cannot be charged to the funds reserved for pre-employment transition services. If this description is in the general transition section of the agency's policy and procedures, consider linking to that section [here](#).

### 4. Documentation

- a. Describe how the agency meets the requirement to maintain either hard copies or electronic copies of required supporting documentation in the individual's service record.

5. Student progress and outcomes of the five required activities and any individualized VR services provided under an IPE in support of pre-employment transition services.
  - a. Describe the expected student outcomes and how they will be measured for each of the five required activities and any individualized VR services provided under an IPE in support of pre-employment transition services.
  - b. Describe the documentation of student progress that is required for service provided by VR agency staff and services that are purchased.
- b. Authorized Activities
  - i. Describe how the agency will track and report, on the RSA-17 the costs associated with the provision of authorized activities separately from required and coordination activities. Costs associated with the authorized pre-employment transition services must be reported on G.38.b. if they were incurred as a result of VR agency staff providing such services.
  - ii. Describe the agency's fiscal forecasting methodology and how agency administrators determine whether reserve funds remain after identifying the number of students in need of and funds necessary for the provision of required activities and pre-employment transition coordination activities, so that the agency may provide one or more of the nine authorized pre-employment transition activities to improve the transition of students with disabilities from school to postsecondary education or an employment outcome; and support the arrangement or provision of the "required" activities.
  - iii. Describe when and how often the agency will forecast and how adjustments will be made periodically to ensure sufficient funds remain available to provide authorized activities.
  - iv. Describe the nine authorized activities that the VR agency may engage in if funds remain.
- c. Pre-Employment Transition Coordination Activities
  - i. Describe each of the four pre-employment transition coordination activities and how the agency will carry these out.

1. Describe how VR will prioritize participation in the IEP meeting
2. Describe how VR will work with local workforce development boards, one-stop centers and employers to develop work opportunities for students with disabilities, including internships, summer employment, other work opportunities and apprenticeships.
3. Describe how VR will work with schools, including carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services under this section.
4. Describe how VR will prioritize participation in person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.)
5. Describe how the cost for VR agency staff carrying out the four pre-employment transition coordination activities are tracked to ensure they are accurately reported on the RSA-17 (line G.38.a.)

## 5. Outreach and Coordination with Education

*This section is one of the most important sections to address, as many of the IDEA transition services that the school is required to provide look very similar to the pre-employment transition services specified in the Rehabilitation Act, as amended by WIOA. In addition, many students may not need one or more of the five required pre-employment transition services if they already received similar types of services as part of their transition planning in accordance with IDEA transition services. While WIOA regulations specify VR pre-employment transition services must be provided in collaboration with local educational agencies (LEA), LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a free appropriate public education (FAPE) as required under IDEA. Pre-employment transition services and transition services can be both vocational rehabilitation services under the VR program and special education or related services under IDEA.*

*While these services can be similar, such as a work-based learning experience, each entity is providing these services in accordance with their respective statute and*

*regulations. Thus, while a work-based learning experience may be provided by both entities, VR would be providing the service as a pre-employment transition service, while Education would be providing that service as an IDEA transition service in accordance with the student's IEP. This is important to note because IDEA transition services, while similar, are not necessarily services that the VR agency then reports as a pre-employment transition service provided to the student with a disability. The VR agency would report a service provided by the LEA to the student with a disability when the VR agency has collaborated with the LEA to arrange for or provide pre-employment transition, or through a contract with the LEA to provide such services under the VR agency's authority, and the VR agency has determined that such services are not the role and responsibility of the Education agency under IDEA. The five required pre-employment transition services activities, along with the four coordination and nine authorized activities, must be provided or arranged by VR.*

*Decisions as to which agency, the VR agency or LEA, is responsible for providing and/or paying for pre-employment transition services or transition services considered to be both a special education (or related service) or VR service must be made at the State level). Nothing under title I of the Rehabilitation Act shall be construed as reducing a LEA's obligation to provide special education or related services under IDEA (see section 101(c) of the Rehabilitation Act and §361.22(c).*

- a. Methods for identifying students with disabilities in need of pre-employment transition services
  - i. Include strategies for identifying unserved and underserved populations (e.g., juvenile justice, foster care, homeless, mental illness, etc.), students with individualized education programs (IEPs) or those served under section 504, and students receiving school psychological, health, nursing, or social work services.
  - ii. Include strategies to ensure state wideness, cultural considerations, and equitable access for the provision of pre-employment transition services for students with disabilities, particularly in rural or high poverty areas with limited internet access, resources, and staff.
  - iii. Identify strategies to reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school to increase the number of individuals receiving VR services.

- iv. Describe strategies the VR agency is using to increase the number of individuals receiving pre-employment transition services.
- b. Identify how VR will conduct outreach and inform schools, students, and families about VR services, ensuring services are equitable.
  - i. Include a description of the purpose of the VR program, eligibility requirements, application procedures, informed choice, and scope of services that may be provided to eligible or potentially eligible individuals.
- c. Identify process/strategies to ensure consistent access to students in person or virtually and how this will be communicated with the classroom teacher or identified point of contact at the school.
- d. Identify how the VR agency, with the educational agency, currently delineates roles and responsibilities for transition services, including pre-employment transition services and VR transition services, as well as transition services under IDEA, to avoid duplication or supplanting of services.
- e. Identify the process for determining responsibilities, including any financial obligations of VR and Education.
- f. Identify how disputes will be addressed and handled.
- g. Identify the process for staff to plan and coordinate transition services with the local educational agencies and when this occurs.

## 6. Process for Potentially Eligible Students with Disabilities to Receive Pre-Employment Transition Services

- a. Clarify that students are not required to apply for VR) services to receive pre-employment transition services; however, students can apply for VR services at any time and may receive pre-employment transition services prior to and after application, after eligibility determination and under an IPE.
- b. Describe referral process and collection of required student data elements.
  - i. Include process for obtaining student referral/request form for pre-employment transition services and/or VR services.
- c. VR review and approval

- i. Describe documentation required for verifying an individual is a student with a disability.
  - ii. Describe process for how VR determines student need for the pre-employment transition services to be provided, services selected, student agreement with services to be provided, the method for service delivery, and documentation procedures (e.g., case note, pre-employment transition services agreement or form).
  - iii. Describe the process for how students with disabilities are informed of their service and service provider options and involved in the selection of pre-employment transition services and the entity to provide such services.
- e. Describe how the VR agency will measure outcomes or student progress in achieving goals established for the pre-employment transition services the student receives by VR staff, as well as those services that are purchased by the VR agency.
  - f. Describe how the VR agency will document in the case record student progress and achievement of anticipated outcomes for each of the required pre-employment transition services received (e.g., progress reports, service notes, case notes, etc.) for services provided by VR staff, as well as any purchased services.
  - g. Describe the strategies that the VR agency is using to encourage potentially eligible students with disabilities to consider applying for the VR program.

## **7. Provision of Reasonable Accommodation, Auxiliary Aids and Services**

- a. Describe and or define auxiliary aids and services (Title II of the Americans with Disabilities Act (ADA) implementing regulations define “auxiliary aids and services” in 28 CFR 35.104).
- b. Describe how the agency will provide or arrange for the provision of auxiliary aids and services for students with disabilities with sensory and communicative disorders who need such services to access or participate in pre-employment transition services.
- c. Include guidance that personally prescribed devices and services do not meet the definition of auxiliary aids and services and may not be charged to the pre-employment transition services reserve; however, they could be provided to eligible students with disabilities in accordance with an individualized plan for employment (IPE) using non-reserved funds.

- d. Include guidance that the agency does not need to conduct a search for comparable services and benefits for potentially eligible students with disabilities, including when providing auxiliary aids and services. The search for comparable benefits and services is required for eligible students with disabilities, except to the extent that these aids and services constitute “rehabilitation technology.” (34 CFR 361.5(c)(45)).

## 8. Process for Applicants and Eligible Students with Disabilities to Receive Pre-Employment Transition Services: Initiating Application for Vocational Rehabilitation Services

- a. Describe the process for students to complete an application for VR services:
  - i. Individuals who received pre-employment transition services as potentially eligible students and are interested and in need of additional VR services
  - ii. Individuals who have not received pre-employment transition services and are interested and in need of VR transition services or other VR services
  - iii. If a student requires additional vocational rehabilitation services outside of pre-employment transition services, they must apply, an eligibility determination must be made, and the additional VR services, as well as the pre-employment transition services to be provided, must be listed on an approved IPE.
- b. Describe the process for eligibility determination within 60 days from the date of application for students and youth with disabilities (see [link to agency’s eligibility determination section of their policy manual](#)).
- c. Describe the process for students with disabilities and their ability to receive and/or continue to receive pre-employment transition services when they have applied for VR services, been determined eligible, and are assigned to an open Order of Selection category, if the VR agency has implemented an order of selection. Students who received pre-employment transition services prior to an eligibility determination and placement on an OOS waiting list, may continue to receive those and any of the five required activities while on a waiting list.
- d. Describe the process for students with disabilities who are receiving pre-employment transition services or have not begun to receive pre-employment transition services and their ability to receive and/or continue to receive pre-employment transition services

when they have applied for VR services, been determined eligible, and are assigned to a closed Order of Selection category.

- e. Describe the process for how students with disabilities are informed of their options and involved in the selection of pre-employment transition services and the entity to provide such services.
- f. Describe the process for students with disabilities who have applied for VR services and been determined ineligible (and thus, are no longer potentially eligible) who can then no longer receive and/or continue to receive pre-employment transition services.

## 9. Individualized Plan for Employment (IPE)

This section should be consistent with the IPE development for all eligible individuals and can either link here to where the policy and procedures regarding IPE development for the agency is located or replicate that section here, along with the following specific considerations for students with disabilities in receipt of pre-employment transition services:

- a. Describe the developmental process of services to students with disabilities and how an initial plan for students with disabilities will consist of services that are exploratory in nature.
- b. Describe how the IPE with a projected post-school employment outcome (34 CFR §361.46(a)(1)) will outline the services and activities that guide the individual's career exploration.
- c. Describe how the projected post-school employment outcome facilitates the individual's exploration and identification of a vocational goal based upon his or her informed choice.
- d. Describe how and when the IPE with a projected post-school employment outcome will need to be amended to include a specific employment goal (as soon as one is determined)
- e. Describe how the agency will include HS diploma as a service on the IPE when a student is enrolled in an educational program working toward a HS diploma.
- f. Describe how an IPE is developed in consideration of the student's individualized education program (IEP) or 504 services, as applicable. (34 CFR §361.45 (d)(9))

- g. Describe how the IPE must be coordinated with the IEP or 504 services, as applicable, for that individual in terms of the goals, objectives, and services identified in the education program. (34 CFR §361.46 (d))
- h. Describe how students and families can draft their own IPE, in accordance with informed choice, just as they can lead their own IEP in school, and how both support self-advocacy and self-determination.
- i. Describe the process to ensure that students with disabilities who apply for and are determined eligible for the VR program have an IPE in place no later than 90 days from the date of eligibility determination and prior to the student exiting the secondary school setting.
- j. Describe how the development and approval of an IPE should take place as early as possible during the transition planning process and not later than the time a student with a disability that has been determined to be eligible for vocational rehabilitation services leaves the school setting (34 C.F.R. § 361.22), unless the eligible student with a disability is assigned to a closed category under an order of selection.

## 10. Additional VR Services for Eligible Students with Disabilities on an IPE

- a. Identify those services that are necessary for students with disabilities to participate in and benefit from pre-employment transition services:
  - i. Describe how the agency determines with the eligible student with a disability, any additional VR services they may need to participate in one or more of the five required pre-employment transition services.
  - ii. Describe how these additional individualized VR services will be documented on an IPE, in the case record and reported in the case management system and on the RSA 911.
    - 1. For more information related to reporting pre-employment transition services in the RSA-911, [please review this FAQ](#).
  - iii. Describe how these additional costs for these additional individualized VR services will be allocated and charged to the reserve requirement and reported on the RSA 17.
- b. Identify those individualized VR services that are necessary to support either the student's projected post-school employment outcome or specific employment goal

identified on the IPE but are not necessary for the student to benefit from pre-employment transition services and how these services will be documented in the case record and reported in the case management system and on the RSA-911.

- c. Describe how the agency determines with the eligible student with a disability any additional VR services they may need.

## 11. Financial Need: Student/Family Participation in Costs for Pre-Employment Transition Services

- a. Clarify that a financial needs test cannot be applied to pre-employment transition services required activities.

*There is no Federal requirement that the financial need of individuals be considered in the provision of vocational rehabilitation services in 34 CFR § 361.54(a) and 34 C.F.R. § 361.54(b)(3)(ii) expressly provides that the designated State unit may not apply a financial needs test, or require the financial participation of the individual has been determined eligible for Social Security benefits under titles II or XVI of the Social Security Act. If the designated State unit chooses to consider financial need it must have written policies for determining the financial need of an eligible individual or individuals who are receiving services through trial work experiences and those policies must be applied uniformly to all individuals in similar circumstances in accordance with 34 CFR §361.54(b)(2)(ii). The regulatory provisions at 34 CFR § 361.54(b)(3)(i) describe services that are exempt from consumer financial participation and does not include “pre-employment transition services.” However, some of the required activities under pre-employment transition services itemized in 34 CFR § 361.48(a), such as job exploration counseling or an auxiliary aide or service (e.g., interpreter or reader services necessary to participate in the VR program), are similar to those services exempt from a financial needs test and individual financial participation, including vocational guidance and counseling and any auxiliary aid or service. In addition, any student receiving benefits through titles II or XVI of the Social Security Act, would be exempt from a financial needs test or individual financial participation. Furthermore, the sources of funding for pre-employment transition services are described in 34 CFR § 361.48(a) as, “Federal funds reserved in accordance with § 361.65, and any funds made available from State, local, or private funding sources.” When these provisions are read in concert, it is clear that the designated State unit (DSU) determines whether to implement a policy for financial participation*

*in the costs of VR services by those individuals eligible for the VR program or participating in a trial work experience in consideration of Federal requirements that exempt from this participation only certain specific services. However, any such policy must be applied uniformly. The DSU would not have the authority nor the opportunity to require that students with disabilities who have not applied or been determined eligible participate in the costs of pre-employment transition services, and these services are not trial work experiences. Thus, requiring eligible individuals to participate in the cost of pre-employment transition services and not require such participation from individuals who have not applied for VR would not be a uniform practice for all individuals receiving pre-employment transition services. While Federal regulations indicate that private funding sources may be used for the provision of pre-employment transition services, we believe that this funding source is meant to be a community resource or donated funds rather than consumer financial participation. **Therefore, students in receipt of pre-employment transition services, regardless of whether they have applied or been determined eligible for VR services, are exempt from a financial needs test and individual financial participation for such services. However, eligible individuals would not be exempted from a financial needs test or financial participation policies if they are receiving other VR services that are needed to participate in pre-employment transition services under an IPE.***

## 12. Students Who No Longer Meet the Definition of a Student with a Disability or No Longer Need Pre-Employment Transition Services

*This section should address the following:*

### b. Potentially Eligible and Eligible Students

- i. Potentially eligible and VR-eligible students may receive pre-employment transition services for as long as they meet the definition of a “student with a disability”. Even if a student achieves the objectives and outcomes intended in receipt of pre-employment transition services and is no longer communicating a need of additional pre-employment transition services:

1. They continue to be reported as a student with a disability in the RSA 911 until they no longer satisfy the definition of a student with a disability (Data

Element 22) as they can return for services at any time so long as they meet the definition of a “student with a disability.”.

2. They can also decide to apply for VR services and receive pre-employment transition services and/or additional individualized VR services under an IPE.

### c. Eligible Students

- i. Once a student has applied for VR services and been determined eligible, all services the student may need, including any pre-employment transition services, are included on the IPE.

1. A student will continue to receive pre-employment transition services they may need until:

- A. The individual no longer meets the definition of a student with a disability. They will continue to receive any additional individualized VR services they need as outlined on their IPE.
- B. The student has completed all pre-employment transition services they need. They will continue to receive any additional individualized VR services they may need as outlined on their IPE.

## 13. Procedures and Documentation for Students and Youth to Enter Subminimum Wage

- d. If the agency’s policy and procedure for section 511 and subminimum wage (SMW) is in another section, reference that here so that its application for students and youth can be linked, or
- e. The agency could include the section of its policies and procedures on section 511 that specifically apply to students and youth with disabilities in here and reference back to the 511 section. Regardless of where the agency decides to include this information, the following information should be considered with regard to students and youth with disabilities, including:
  - i. Requirements for the VR Agency:

1. For individuals with disabilities that are 24 years of age or younger:

- A. Provide pre-employment transition services and documentation of the completion for these services for students with disabilities within 45 days of completion pre-employment transition services (or 90 days if additional time is necessary due to extenuating circumstances).
  - B. Provide documentation of ineligibility certification as applicable within 45 days.
  - C. Provide documentation of unsuccessful case closure as applicable within 45 days.
  - D. Obtain documentation that the individual received transition services under IDEA as applicable.
  - E. Provide career counseling and information and referrals to federal and state programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment every six months for the first year of SMW employment and annually thereafter for the life of the employment.
  - F. Provide career counseling and information and referrals to any youth found ineligible or closed from plan within 30 calendar days if they know that the individual is seeking SMW employment.
  - G. Provide documentation of career counseling and information and referrals within 45 days of receipt, or 90 days if additional time is necessary due to extenuating circumstances.
  - H. Provide documentation of refusal of the youth to participate in any of the activities within 10 days of the refusal.
- ii. For all individuals in SMW employment, regardless of age:
- 1. Provide career counseling and information and referrals to federal and state programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment every six months for the first year of SMW

- employment and annually thereafter for the life of the employment. The career counseling and information and referrals must be delivered in a manner that facilitates independent decision-making and informed choice.
2. Provide documentation of completion of career counseling and information and referrals to the individual within 45 days, or 90 days if additional time is necessary due to extenuating circumstances.
  3. Provide documentation of information provided to individuals on self-advocacy, self-determination, and peer mentoring training opportunities available in the individual's geographic area, provided by an entity that does not have a financial interest in the individual's employment outcome in those instances where the individuals are working for an entity with less than 15 employees covered by the 14 (c) certificate within 45 days, or 90 days if additional time is necessary due to extenuating circumstances.
- iii. For the subminimum wage employer who holds a 14 (c) certificate (referred to as "entity"):
1. The entity may employ an individual with a disability age 24 or younger if the individual is **currently employed** in SMW employment as of July 22, 2016.
  2. The entity may employ a new individual with a disability age 24 or younger if they obtain documentation that:
    - a. The individual has received pre-employment transition services or transition services under IDEA, has applied for VR services and been found ineligible, or applied and was found eligible for VR services.
    - b. The individual had an IPE developed and had been working toward an employment outcome with appropriate supports and services for a reasonable period of time, determined on an individual basis, but up to 24 months for an individual with an SE outcome identified in their IPE, without success.
    - c. The individual's case is closed.
    - d. The individual has been provided career counseling and information and referrals to federal and state programs and other resources in the individual's geographic area that offer employment-related

services and supports designed to enable the individual to explore, discover, experience, and attain competitive integrated employment.

- i. The entity must maintain documentation that career counseling and information and referrals were provided every six months in the first year and annually thereafter for all employees.

3. Regardless of an individual's age, the entity must:

- a. Maintain documentation that career counseling and information and referrals was provided every six months in the first year and annually thereafter.
- b. Inform individuals of self-advocacy, self-determination, and peer mentoring training opportunities available in the individual's geographic area, provided by an entity that does not have a financial interest in the individual's employment outcome.

iv. For State or Local Educational Agencies

1. For individuals with disabilities age 24 or younger:

- a. Consult with the DSU to develop a new process or utilize an existing process to document the receipt of transition services under IDEA as applicable.
- b. Transmit documentation that the individual received transition services as soon as possible upon the completion of the required activity or service, but no later than 30 days after the completion of the required activity or services, or 60 calendar days if additional time is needed due to extenuating circumstances.
- c. Provide documentation of an individual's refusal to participate in transition services to the DSU within five calendar days of the refusal.
- d. Retain a copy of all documentation provided to the DSU.
- e. The agency may not enter into a contract or other arrangement with an entity for the purpose of operating a program for an

individual age 24 or younger under which work is compensated at minimum wage.

## 14. Documenting, Tracking, and Reporting

- f. VR staff time that can be charged to the reserve:
  - i. Describe how VR staff are tracking and documenting time spent providing required pre-employment transition services and coordination activities for students with disabilities.
  - ii. Describe the activities staff can engage in and that can be charged to the reserve.
  - iii. Describe the process and internal controls for how staff will track and document the time spent providing or arranging for one or more of the required pre-employment transition services for students with disabilities, including:
    - 1. who will review and approve such time (e.g., managers),
    - 2. what documentation these individuals will review for their staff (e.g., timesheets, calendars, etc.), and
    - 3. at what intervals (e.g., monthly, biweekly, etc.) to ensure the accurate reporting of time spent by VR staff that can be charged to the reserve.

## Pre-Employment Transition Services Fiscal Management

**Explain the process for reserving and expending at least 15 percent of VR Federal funds under Section 110(d) of the Rehabilitation Act for the provision of pre-employment transition services under Section 113 of the Rehabilitation Act.**

## 15. Reservation of Funds

- a. Describe how the agency determines the amount of federal VR funds required to be reserved for the provision of pre-employment transition services (no less than 15 percent of VR Federal grant award funds under Section 110(d) of the Rehabilitation Act for the provision of pre-employment transition services under Section 113 of the Rehabilitation Act). See the [Pre-ETS Reserve Set-Aside Determination Guide](#) for additional information regarding how to calculate the amount of funds required to be reserved for pre-employment transition services.

- b. Describe how any adjustments to the amount of federal funds required to be reserved are made due to the reallocation or relinquishment of funds.
- c. Describe how any adjustments to the amount of federal funds required to be reserved are made based upon the amount of matched federal award funds.
- d. Describe the process and frequency for the periodic monitoring and adjustment of budgets to ensure that the funds required to be reserved for the provision of pre-employment transition services are expended.
- e. Describe how the agency ensures that only federal expenditures for the appropriate services are charged to the funds reserved for the provision of pre-employment transition services.
- f. Describe the agency's process for ensuring accurate reporting, on the RSA-17 and RSA-911, of reserved funds expended for pre-employment transition services, including costs for required and coordination activities, as well as authorized activities, provided directly by VR agency staff.
- g. Describe how the agency's cost categories and tracking ensures the correct reporting of required/coordination activity costs versus the cost for authorized activities.
- h. Describe the process for tracking staff time spent providing or arranging for the provision of pre-employment transition services and how payroll expenses are appropriately allocated when charged to the reserve funds, including any adjustments that are made periodically, and what documentation is required.
- i. Describe the process to establish reasonable and allowable rates for services, including pre-employment transition services, and delivery of quality services, consistent with the VR agency's written policies covering the nature, scope and process governing the rates of payment for all purchased VR services.
- j. Describe how purchased services are allocated toward the reserve, who within the agency is responsible, and the process for the allocation and expenditure of reserve funds on purchased services.
  - i. Describe how the VR agency purchases services that may be charged to the reserve and how it ensures that only allowable costs are charged to the reserve (e.g., fee-for-service agreements/contracts for the provision of pre-employment transition services or any third-party cooperative arrangements that provide pre-employment transition services).

- ii. Describe process for allocating program costs to partner programs, when VR agencies provide pre-employment transition services in classrooms that include students with and without disabilities.
- iii. Describe the process for monitoring contracts and the provision of contracted pre-employment transition services.
- k. Describe costs that are not allowable to be charged to the reserve and the process for ensuring the costs will not be charged to the reserve, including administrative costs borne by the DSU, including supervisory costs, rent, utilities, indirect costs and other similar administrative costs – not service costs – and cannot be charged to the reserve.
- l. Describe how the agency will periodically review and monitor all charges and adjust them when identifying any expenses that should not have been allocated to the reserve.

## 16. Fiscal Forecasting

- m. Describe the process for the agency to determine whether reserve funds remain after providing pre-employment transition required and coordination activities to all students with disabilities in the State who may need them, including how often this process will be reviewed and adjustments made to determine whether the agency can expend funds on one or more of the nine authorized pre-employment transition services activities.
- n. For guidance on the process for determining if the agency can move from required and coordination pre-employment transition services to authorized activities, see the [Pre-ETS Reserve Set-Aside Determination Guide](#).

**Identify strategies for developing policies, procedures, internal controls, staff training, and cross-agency training (VR, providers, teachers), and supplementary resource documents such as desk guides.**