# Vocational Rehabilitation Services Manual Section C-1300

Table of Contents

[Vocational Rehabilitation Services Manual Section C-1300 1](#_Toc132622458)

[Notes on the Manual 3](#_Toc132622459)

[Manual Overview 3](#_Toc132622460)

[Vocational Rehabilitation Services Manual C-1300: Transition Services for Students and Youth with Disabilities 4](#_Toc132622461)

[Introduction 4](#_Toc132622462)

[C-1301: Legal Authorization 6](#_Toc132622463)

[The Rehabilitation Act of 1973 6](#_Toc132622464)

[34 CFR 361.5(c) (55) 6](#_Toc132622465)

[29 USC 701 (b)(4)(5) 6](#_Toc132622466)

[34 CFR 361.65(a)(3)(i) 7](#_Toc132622467)

[34 CFR 104.33(a) and (b) 7](#_Toc132622468)

[34 CFR 361.53 (d) 7](#_Toc132622469)

[C-1302: Roles of the Transition Services Team 7](#_Toc132622470)

[C-1302-1: Student or Transition Services Customer 8](#_Toc132622471)

[C-1302-2: Transition Vocational Rehabilitation Counselor 9](#_Toc132622472)

[C-1302-3: Family Involvement 10](#_Toc132622473)

[C-1302-4: Local Education Agency 11](#_Toc132622474)

[C-1302-5: Other VR Staff Members 14](#_Toc132622475)

[C-1302-6: Community Members 14](#_Toc132622476)

[C-1303: Transition Services and the IEP Process 15](#_Toc132622477)

[C-1303-1: Required for Planning and IPE Development 15](#_Toc132622478)

[C-1303-2: Students Receiving Section 504 Services in Secondary Education 19](#_Toc132622479)

[C-1303-3: Students Enrolled in Private School or Homeschool Settings 20](#_Toc132622480)

[C-1303-4: Helpful Checklist of Transition Considerations 20](#_Toc132622481)

[C-1304: Coordination and Providing Information 21](#_Toc132622482)

[C-1304-1: Legal Authority 22](#_Toc132622483)

[C-1305: Providing Transition Services 25](#_Toc132622484)

[C-1305-1: Core Skills 26](#_Toc132622485)

[C-1305-2: Trial Work for Transition 28](#_Toc132622486)

[C-1305-3: Referral to a Vocational Rehabilitation Teacher 28](#_Toc132622487)

[C-1305-4: Child Labor Laws 28](#_Toc132622488)

[C-1305-5: Assistive Technology 29](#_Toc132622489)

[C-1305-6: Providing Pre-Employment Transition Services 31](#_Toc132622490)

[C-1305-7: Student with a Disability 31](#_Toc132622491)

[C-1305-8: Types of Pre-Employment Transition Services (Pre-ETS) 32](#_Toc132622492)

[C-1305-9: Funding 34](#_Toc132622493)

[C-1305-10: Working with Potentially Eligible Students 35](#_Toc132622494)

[C-1305-11: Capturing Pre-Employment Transition Services Activity in ReHabWorks 39](#_Toc132622495)

[C-1305-12: Case Note Documentation 39](#_Toc132622496)

[C-1305-13: Group Skills Training 40](#_Toc132622497)

[C-1305-14: Dual Credit Courses 48](#_Toc132622498)

[C-1305-15: Temporary Learning Experience 49](#_Toc132622499)

[C-1305-16: Camps 49](#_Toc132622500)

[C-1305-17: Workshops and Seminars 49](#_Toc132622501)

[C-1305-18: Pre-ETS as a Contract Type 50](#_Toc132622502)

[C-1306: Pathways to Careers Initiatives 50](#_Toc132622503)

[C-1306-1: Summer Earn and Learn 50](#_Toc132622504)

[C-1306-2: Student HireAbility Navigator Program 52](#_Toc132622505)

[C-1306-3: Explore STEM! 54](#_Toc132622506)

[C-1306-4: Advise TX 55](#_Toc132622507)

[C-1306-5: Paid Work Experience 56](#_Toc132622508)

[C-1307: Participation in Cost of Services 61](#_Toc132622509)

[C-1307-1: Student Participation in the Cost of Training Seminars and GSTs 61](#_Toc132622510)

[C-1307-2: Family Participation in Training Seminars and GSTs 62](#_Toc132622511)

[C-1307-3: Texas School for the Blind and Visually Impaired 62](#_Toc132622512)

[C-1307-4: Supported Employment 62](#_Toc132622513)

[C-1308: Transferring a Transition Services Case 63](#_Toc132622514)

## Notes on the Manual

On October 1, 2017, Texas Workforce Commission’s Blind Services Division and Rehabilitation Services Division combined to create a single designated state unit (DSU) to administer the vocational rehabilitation program for Texans with disabilities.

The combined Vocational Rehabilitation Services Manual (VRSM) was initially published on October 1, 2017. The latest update to this manual is reflected in the chapters below.

Please note that VRSM includes links to information that is intended to provide additional decision-making supports to VR staff. Some of this information may not be available to individuals who are accessing the VRSM outside of TWC's firewall. Copies of materials that cannot be accessed directly through links can be made available upon request.

Substantive revisions to the content are noted in the VRSM List of Revisions. Any printed versions may not contain the latest policy changes.

If you have any questions about VRSM content, please contact the TWC Vocational Rehabilitation Division Policy Team at state office by sending an email message to vrsm.support@twc.texas.gov.

## Manual Overview

The VR Services Manual:

* helps ensure VR customers receive quality services to assist them in achieving successful competitive integrated employment outcomes as a result of their participation in vocational rehabilitation services.;
* helps to ensure taxpayer funds are spent wisely and each purchase paid for with public funds represents full value to the taxpayer; and
* provides published policies and procedures for maintaining compliance with federal and state laws, statutes, and rules or regulations.

The latest update to this manual is reflected in the chapters below. Any printed versions may not contain the latest policy changes.

# Vocational Rehabilitation Services Manual C-1300: Transition Services for Students and Youth with Disabilities

# The contractor and contractor staff that provide services described in this chapter also must comply with Chapters 1–3 of the VR Standards for Providers manual.

## Introduction

TWC-VR provides transition services to eligible students and youth with disabilities who are between the ages of 14 and 24 years old. Students and youth with disabilities under the age of 14 and served on specialized caseloads, who were made eligible for VR services prior to September 30, 2017, can also receive transition services.

Transition services:

* prepare students with disabilities to progress from receiving special education services and services required under Section 504 of the Rehabilitation Act of 1973, as amended, to receiving VR services; and
* help minimize potential delays in service delivery during the transition from school to employment or independence.

Transition services are not a separate program; they are a subset of VR services. Although this chapter is devoted to specific transition topics, all processes and procedures in the VRSM apply to transition services, unless otherwise stated. Transition services are provided through a flexible multiyear process that develops with each student.

Two of the most significant amendments to the Rehabilitation Act of 1973 made by the Workforce Innovation and Opportunity Act (WIOA) were new definitions for the terms "student with a disability" and "youth with a disability."

|  |  |
| --- | --- |
| **Student with a Disability—Pre-Employment Transition Services (Pre-ETS)** | **Youth with a Disability for Supported Employment\*** |
| The student must:* be age 14–22; and
* be enrolled in school (public, private, home, or postsecondary).
 | The youth must:* be age 14–24; and
* have a disability that is designated as "most significant."
 |
| Defined for the purpose of designating who can receive services counted as Pre-ETS (toward the 15 percent expenditure requirement).Can be eligible or potentially eligible for VR services. | Defined for the purpose of designating which customer expenditures count toward the 50 percent Supported Employment requirement. |
| Can receive services in the Pre-ETS categories. | If a youth also meets the definition of a student with a disability, then the youth can receive Pre-ETS. See VRSM C-1200: Supported Employment Services for more information.If the youth has an individualized plan for employment (IPE) for his or her supported employment services, then the youth's Pre-ETS must stop. (Youth who receive Supported Employment services are not eligible for Pre-ETS). |
| Supported Employment services cannot be counted as Pre-ETS. | Extended services for Supported Employment can be provided to a youth for up to four years, or until the youth's 25th birthday, whichever comes first.For more information on extended services, see VRSM C-1200: Supported Employment Services. |

The definition of students with a disability is a subset of the definition of youth with a disability. It is possible for an individual to age out of being a student with a disability and still need and receive VR transition services as a youth with a disability (see services under 34 CFR 361.5(c) (55)). The IPE must clearly identify and document the need for all VR transition services.

\*When individuals are in the 14-24 age range and have a disability, they will meet the "Youth with a Disability" definition. The disability only has to be considered "most significant" if they are also participating in Supported Employment services.

## C-1301: Legal Authorization

Transition services are mandated by the following federal laws:

### The Rehabilitation Act of 1973

The Rehabilitation Act of 1973 was reauthorized and amended by WIOA in 2014.

### 34 CFR 361.5(c) (55)

Federal regulations implementing WIOA define "Transition Services" as follows.

A coordinated set of activities for a student or [youth with a disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=c8ba67e1a80a0db1a118e322727e5777&term_occur=2&term_src=Title:34:Subtitle:B:Chapter:III:Part:361:Subpart:A:361.5) is:

"(i) Designed within an outcome-oriented process that promotes movement from school to post-school activities, including postsecondary education, vocational training, [competitive integrated employment](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=780921f38226e9d2074ac6202d0918b6&term_occur=11&term_src=Title:34:Subtitle:B:Chapter:III:Part:361:Subpart:A:361.5), [supported employment](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=550edfb6a3f5b5853538d4f19b42ce1b&term_occur=9&term_src=Title:34:Subtitle:B:Chapter:III:Part:361:Subpart:A:361.5), continuing and adult education, adult services, independent living, or community participation;

(ii) Based upon the individual student's or youth's needs, taking into account the student's or youth's preferences and interests;

(iii) That includes 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;

(iv) That promotes or facilitates the achievement of the [employment outcome](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=0df727cd8b9e131a290f3319022bfeed&term_occur=12&term_src=Title:34:Subtitle:B:Chapter:III:Part:361:Subpart:A:361.5) identified in the student's or youth's individualized plan for employment; and

(v) That includes outreach to and engagement of the parents, or, as appropriate, the representative of such a student or [youth with a disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=c8ba67e1a80a0db1a118e322727e5777&term_occur=3&term_src=Title:34:Subtitle:B:Chapter:III:Part:361:Subpart:A:361.5)."

### 29 USC 701 (b)(4)(5)

Pre-Employment Transition Services are provided to students with a disability, as defined in WIOA "to increase employment opportunities and employment outcomes for individuals with disabilities, including through encouraging meaningful input by employers and vocational rehabilitation service providers on successful and prospective employment and placement strategies; and (5) to ensure, to the greatest extent possible, that youth with disabilities and students with disabilities who are transitioning from receipt of special education services under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) and receipt of services under section 794."

### 34 CFR 361.65(a)(3)(i)

"Pursuant to section 110(d) of the Act, the State must reserve at least 15 percent of the State's allotment, received in accordance with section 110(a) of the Act for the provision of pre-employment transition services, as described at §361.48(a) of this part."

A Provision of the Rehabilitation Act of 1973
(29 USC 701 et seq.) Section 402, §2(a) (29 USC 701(a))

''(7)(A) a high proportion of students with disabilities is leaving secondary education without being employed in competitive integrated employment or being enrolled in postsecondary education; and ''(B) there is a substantial need to support such students as they transition from school to postsecondary life.''

### 34 CFR 104.33(a) and (b)

"A recipient that operates a public elementary or secondary education program or activity shall provide a free appropriate public education to each qualified handicapped person who is in the recipient's jurisdiction, regardless of the nature or severity of the person's handicap." "…the provision of an appropriate education is the provision of regular or special education and related aids and services that (i) are designed to meet individual educational needs of handicapped persons as adequately as the needs of non-handicapped persons are met."

### 34 CFR 361.53 (d)

Coordination of services for students with disabilities:

The IPE for a student with a disability must be coordinated with the individualized education program or Section 504 services, as applicable, for that individual in terms of the goals, objectives, and services identified in the education program.

## C-1302: Roles of the Transition Services Team

The key members of the Transition Services Team are:

* the student (that is, the transition services customer);
* the TVRC;
* family members; and
* staff from the local education agency.

Transition services are student-centered. Success relies on collaboration between the members of the transition team and other support systems. Students and youth with disabilities will soon be adults who need jobs, homes, friends and family, and community involvement. Transition services that are facilitated by VR staff coordinate resources so that an independent life and vocational goals can be achieved. The earlier the planning begins, the sooner supports and services can be coordinated to help the student achieve his or her employment goals.

The transition team plans and develops long-term vocational and independent living goals that are consistent with the interests, needs, and preferences of the student. The key members of the transition team should include professionals and nonprofessionals who are interested in the success of the student.

### C-1302-1: Student or Transition Services Customer

The student (transition services customer) is the most important member of the transition team. WIOA defines a student with a disability as an individual who is attending school in a recognized educational setting.

A recognized educational setting may include public schools, private schools, home schooling, postsecondary, or other recognized setting, such as schooling provided by juvenile justice facilities.

In Texas, the definition of student with a disability is an individual who is:

* 14–22 years of age;
* enrolled in school; and
* receiving or has received services through special education programs or is considered eligible for Section 504 services.

The responsibility of the student is to actively participate in transition planning and services in order to decide on his or her postsecondary goals, based on his or her personal interests, preferences, and dreams. Working with the other members of the team will help the student explore and develop the steps to achieve his or her goals.

Transition planning must meet the needs of the student and not the needs of transition services or other members of the team.

### C-1302-2: Transition Vocational Rehabilitation Counselor

A transition vocational rehabilitation counselor (TVRC) is a qualified VR counselor who works a specialty caseload of transition students with disabilities. Some VR counselors have a dual-focus caseload; which means that they have a general caseload of adult VR customers and serve as the TVRC to students with disabilities at one or more of the secondary schools in the TVRC's geographic area. Throughout this chapter, when the term "TVRC" is used, it refers to the roles and responsibilities of any counselor that works with transition students with disabilities.

Based on the student's vocational and training needs, the TVRC:

* helps students and youth with disabilities develop and participate in work-based learning opportunities;
* provides information, support, and guidance to transition students, parents, and schools to promote effective transition services;
* helps eligible students develop an IPE;
* networks with school and community resources to develop and maintain referral sources to identify and reach transition students with disabilities;
* acts as a community educator;
* contacts and counsels the student, family, and significant others to help the student complete as many of the transition services included in the IPE as possible;
* manages case flow and caseload size to ensure that effective transition services for students;
* plans and promotes the use of Pre-ETS, where appropriate;
* plans and coordinates employability skill development and confidence building activities for students, such as summer work experience programs, workshops, seminars, and other employment transition services;
* identifies and helps students and their families access other appropriate resources, such as School-to- Careers programs, Tech-Prep career development services, Social Security income (SSI), work opportunity tax credits, and services from the Texas Health and Human Services Commission (HHSC) and appropriate Medicaid waiver programs, such as Community Living Assistance and Support Services (CLASS),
* acts as a consultant to TWC staff regarding transition issues;
* arranges for consultant services from other VR resources, such as Deafblind services, the Vocational Diagnostic Unit, Employment Assistance services, Autism services, the regional and state office program specialist, business relations consultations, the VR teacher, and the Criss Cole Rehabilitation Center;
* helps students obtain technology evaluations, recommended assistive technology, and training in the use of purchased equipment, when appropriate;
* supports students as they make the transition from secondary school to postsecondary education or employment;
* contacts appropriate representatives of other organizations to ensure interagency cooperation; and
* attends individualized educational plan (IEP) meetings, also known as ARD (Admission, Review, and Dismissal) meetings, person-centered planning meetings when invited, as well as other relevant community transition meetings. Attendance may be virtual by conference call, video meeting, and so on.

### C-1302-3: Family Involvement

Family involvement in the transition process can significantly enhance both successful transition services and a successful outcome. Each family has a unique set of values and cultural influences affect their concerns, opinions, and requests.

When family support is available, the family's role in the transition team is to:

* support the student by incorporating rehabilitation training and expectations at home;
* help the student identify and describe the student's and family's needs;
* express expectations for services;
* encourage the student to act as primary coordinator for all services; and
* help the student become an effective self-advocate.

### C-1302-4: Local Education Agency

The role of the local education agency (LEA) is to provide a free and appropriate public education for students with disabilities who are receiving special education or Section 504 services as required under the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act.

IDEA defines transition services as follows:

"A coordinated set of activities for a child with a disability that (A) is designed to be a results-oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including post-secondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation; (B) is based on the individual child's needs, taking into account the child's strengths, preferences, and interests; (C) includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and, when appropriate, acquisition of daily living skills and functional vocational evaluation."

#### 20 USC 1401(34)

Schools are responsible for identifying and providing accommodations and/or modifications based on a student's need to access education. VR cannot provide services strictly for the purpose of accommodating a student to get access to their education, even if a student has an IPE in place. The counselor can partner with the LEA to provide Pre-ETS and other transition services while the student is still in secondary school.

The following table explains the differences between modifications and accommodations as adapted from Texas Education Agency (TEA) Division of IDEA Coordination.

#### Content Modification vs. Instructional Accommodations

|  |  |  |
| --- | --- | --- |
|  | **Instructional Accommodation** | **Instructional Modification** |
| **Explanation** | Changes how the content is:* taught;
* made accessible; and/or
* assessed.

Accommodations DO NOT change what the student is expected to master. The objectives of the course or activity remain intact. | Changes how the content is:* taught;
* made accessible; and/or
* assessed.

Modifications DO change what the student is expected to master. The objectives of the course or activity remain intact. Course or activity objectives are modified to meet the needs of the learner. |
| **Examples** | * One-on-one or small group instruction
* Extended time on assignments and or assessments
* Braille or large print materials
* Shortened assignments and or assessments
* Slant boards or study carrels
* Oral administration of subject-area tasks that do not assess decoding or reading comprehension
 | * Instruction that focuses on select Texas Essential Knowledge and Skills (TEKS) for the grade-level, instead of all TEKS for the grade-level course
* Changes in the scoring rubrics or grading scale
* Reducing the complexity of the activity (for example, requiring only one step, as opposed to multiple steps, to solve a problem)
* Cueing or prompting the student during a grade-level activity
 |

The LEA:

* co-advocates with the student and the family to plan and provide educational services to meet individualized educational objectives, which are documented on an IEP;
* works in partnership with the student, the student's family, and other community resources to coordinate services within the community; and
* provides ongoing information to the student and the family about the adolescent's educational development.

For students with visual impairments, the LEA provides specialized instruction called the Expanded Core Curriculum (ECC), which includes:

* independent living skills;
* career education;
* social interaction and leisure skills;
* self-determination;
* orientation and mobility;
* compensatory skills and sensory efficiency;
* assistive technology; and
* other services appropriate to the student's education.

#### 18+ Programs

When the need is established, some students may stay beyond the initial 4-year high school period to receive extra instruction in vocational, independent living, and, in some cases, programs like Project SEARCH.  These programs are commonly referred to as "18+" programs.

Students participating in 18+ programs have completed their academic requirements to graduate but are still working toward IEP goals established by the ARD Committee.  Services in 18+ continue until the student has met their goals and is exited by the ARD committee, they choose to no longer continue, or they age out. Students retain eligibility for these services through the year in which they turn 21. As long as the student is still 21 on September 1st, they will be eligible to receive services through that school year.

When a student who plans to attend 18+ completes their academic requirements, they are allowed to participate in graduation ceremonies with their class, however, they only receive a Certificate of Completion at that time. They do not receive their actual diploma until they have completed the 18+ services.  For information on how 18+ programs factor into Measurable Skills Gain (MSG), please see VRSM A-500: Measurable Skill Gains.

#### Documenting 18+ in ReHabWorks

The customer's education information must be documented in ReHabWorks (RHW) and in the paper case file to ensure adequate reporting of Measurable Skill Gains (MSG). Refer to VRSM A-505: Documenting Measurable Skill Gains for additional information.

On the Initial Contact page in ReHabWorks, select "18+ Program in High School" in the "currently enrolled" field. On the Training Information page, select "High School Diploma" in the "degree/credential" field.

Once the customer has completed or exited their 18+ program, the initial contact page will need to be updated to reflect the customer's enrollment status. The Training Information page will need to be updated with a graduation date.

For additional information on entering education information in RHW, see the ReHabWorks User Guide B-300: Education History on the TWC SharePoint site.

### C-1302-5: Other VR Staff Members

VR staff who specialize in a variety of areas can help provide transition services and work with the TVRC, the student, and/or family. For example, regional and state office program specialists, employment assistance specialists, VR teachers, Vocational Diagnostic Unit diagnosticians, and deafblind specialists may provide additional direct or indirect support to the student.

### C-1302-6: Community Members

Additional support can be provided to students through collaboration with advocacy groups, other service providers and professionals, nonprofit organizations, clubs and associations, friends, church and faith-based organizations, and any other community member or resource.

## C-1303: Transition Services and the IEP Process

The transition services provided by schools, also referred to as LEAs differ from the transition services provided by VR. In Texas, special education services are planned through the ARD process or the IEP.

The ARD committee plans for and completes the IEP. The committee often consists of the transition student, parents, teachers, other special education staff, and school administration, but members can vary. Transition services provided by VR are coordinated with the transition services provided by the LEA during the ARD.

VR plays an important role in planning transition services as an integral partner in the IEP process.

In working with LEA staff and families throughout the IEP process, the TVRC:

* helps the transition student obtain the maximum benefit from educational services by supporting his or her educational program; and
* provides services to facilitate a smooth transition to postsecondary education and work environments.

Note: Transition students receiving services under Section 504 do not have an IEP and do not have ARD meetings. They receive accommodations but no curriculum modifications. Their services are documented on a Section 504 plan. Students on a Section 504 plan who otherwise meet the definition of a student with a disability are eligible for Pre-ETS.

TWC and TEA have a Memorandum of Understanding (MOU) in place to help create a framework for schools and VR in Texas to work together. The MOU can be found on the Transition Services intranet page.

Questions about the agreement may be submitted to a member of the state office transition team or by email to the VR Pre-ETS mailbox at vr.pre-ets@twc.texas.gov.

### C-1303-1: Required for Planning and IPE Development

WIOA requires VR staff to attend ARD meetings when invited. Attendance may be virtual; that is, through conference calling, video meeting, and so on. Communication with school partners is vital to facilitate appropriate and timely invitations to ARD meetings.

The VR counselor works with the school, parents, community partners, and students to ensure that the student and parents or guardians are informed about available services and any associated program requirements, as a part of a set of coordinated transition services.

The VR counselor must do as follows:

* Explain the services provided by:
	+ other appropriate resources;
	+ the Texas School for the Blind and Visually Impaired (TSBVI);
	+ the Texas School for the Deaf (TSD);
	+ The Blind Children's Program under HHSC;
	+ advocacy organizations, such as Partners for Assisting Texans with Handicaps (PATH)and Disability Rights Texas;
	+ customer groups, such as the American Council of the Blind (ACB) and the National Federation of the Blind (NFB); and
	+ the Criss Cole Rehabilitation Center.
* Obtain and use appropriate school records as a source to determine a student's eligibility and to develop an IPE. School testing that includes a diagnosis determined by school professionals (for example, a diagnostician, licensed specialist in school psychology, speech pathologist, etc.) may be used to establish an impairment for the purpose of determining eligibility. For information on eligibility determination, see VRSM B-300: Determining Eligibility, and for information on IPE development, see VRSM B-500: Individualized Plan for Employment and Post-Employment.
* Complete a comprehensive assessment of the eligible individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, including the need for supported employment services provided in the most integrated setting possible, consistent with the individual's informed choice, as defined by WIOA
* Provide transition services during secondary school as well as after secondary school, during the transition to postsecondary services, such as education, vocational training, and employment
* Coordinate services that align with the transitioning student's IEP
* Attend ARD meetings, when invited, in person or by alternative means such as teleconferencing or video conferencing (see CFR 361.22(b)(1))
* Provide students who have limited or no work experience the opportunity to develop soft and hard skills through Pre-ETS

The VR counselor must also:

* obtain a copy of the most recent IEP or Section 504 plan to help with transition-planning activities;
	+ Note: When an IEP or Section 504 plan is not available, document that in a case note. This may occur when a student is not receiving services in one of these programs while in public school, has not yet started the process, or is enrolled in an educational setting that does not formally provide them (for example, homeschool, private school).
* document in ReHabWorks (RHW) whether the student has an IEP or Section 504 plan; and
* complete the IPE before the eligible student leaves the school setting and no more than 90 days from the time that the student's eligibility for VR services is determined.

IPE services must:

* be vocational in nature; and
* support and lead to achievement of the employment goal identified in the IPE.

IPE services:

* must not be the responsibility of the school district under IDEA or Section 504 of the Rehabilitation Act; and
* must not be readily available from the school district.

Students who receive transition services are usually in a career exploration stage of development while they are still in secondary school. Counseling and guidance, along with specific exploration activities and other Pre-ETS activities, is expected as part of the IPE. Multiple IPE amendments may be necessary as the student's rehabilitation needs and vocational goals change.

Depending on the complexity of the student's circumstances and need for services, TVRCs can begin working with students who are enrolled in secondary school at any time to help them move successfully from school to competitive integrated employment.

According to special education law, transition services must be included in the IEP of a student at age 16; although, in Texas, transition services may begin at age 14, or even earlier, if the IEP or the results of the ARD meeting indicates that the services are necessary.

Transition services promote or facilitate the development of the student's IPE while he or she is still in secondary school.

The IPE for transition services can include:

* Pre-ETS;
* postsecondary education;
* employment services;
* housing;
* daily living skills;
* long-term issues (such as attendant care, guardianship, assistive technology, and therapies);
* activities that promote confidence, team building, and effective communication; and
* transportation and/or maintenance to support other services.

The IPE must also:

* be based on current information regarding the student's knowledge, skills, interests, and preferences;
* set timelines with projected beginning and ending dates for all activities leading toward achieving the student's goals; and
* identify a network of support, such as family, friends, agencies, and community resources, that can help the student achieve the desired goals.

To prepare VR eligible students for success in postsecondary school and competitive, integrated employment, Pre-ETS, along with other VR services, can be provided to enhance or complement services that the school is already providing. Or these services may be provided in partnership with the school, with consideration that the services are not duplicative.

Services exempt from the customer's cost participation include the costs for:

* the assessment for determining the customer's eligibility;
* the assessment for determining the customer's VR needs, including associated maintenance and transportation;
* VR counseling and guidance and referral for other services;
* in-house services provided directly by VR staff;
* job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
* personal attendant services;
* any auxiliary aid or service (for example, interpreter services) that a customer with a disability requires to participate in the VR program;
* diabetes education services;
* orientation and mobility services;
* Pre-Employment Transition Services (Pre-ETS); and
* other VR services that directly support Pre-ETS, like transportation, maintenance, and personal assistant services (applicable for VR eligible students only). See the Pre-ETS Desk Reference Part 2 on the Transition services intranet page for a complete list.

This policy must be applied uniformly to all customers in similar circumstances.

### C-1303-2: Students Receiving Section 504 Services in Secondary Education

The TVRC may also work with students who receive services under Section 504 of the Rehabilitation Act instead of an IEP. Section 504 requires schools that receive federal funding to provide reasonable accommodations to enable students with disabilities to fully participate in the services and programs offered under the general curriculum.

As with the IEP, the TVRC must:

* request a copy of the Section 504 plan; and
* place it in the customer's case file.

### C-1303-3: Students Enrolled in Private School or Homeschool Settings

The TVRC or VR counselor may also work with students who are participating in private school or homeschool settings, which are considered recognized education programs. Therefore, these students are eligible to receive Pre-ETS as potentially eligible or VR eligible students if they are within the appropriate age range.

Students who are receiving homeschool or private school educations may not have special education services available to them in the same way publicly enrolled students do. TWC-VR is not obligated to provide or purchase special education services that are the responsibility of the LEA. If a private or homeschooled student needs a service that would normally be the responsibility of the LEA, TWC-VR may consider the need for that service based on the customer's individual circumstances and determine on a case-by-case basis whether the service is consistent with the student's VR program and is able to be supported. Services on an IPE in these situations are typically not readily available from a school district and are not the responsibility of a school district under IDEA or Section 504 of the Rehabilitation Act (see C-1303-1). Questions about these situations may be submitted to a member of the state office transition team or by email to the VR Pre-ETS mailbox at vr.pre-ets@twc.texas.gov.

### C-1303-4: Helpful Checklist of Transition Considerations

When working with transition students, common counseling and guidance topics include the following:

* Advocacy and guardianship
* Assessment requirements
* Behavior-management planning
* Case management needs
* Career exploration
* Counseling in postsecondary education training
* Current educational needs
* Day programs
* Employment
* Income support
* Independent living skills
* Items that the school provides under IDEA
* Lifetime support and planning
* Medical needs and assistive devices
* Recreation and leisure
* Residential services
* Self-advocacy activities
* Supported employment
* Therapies and treatments
* Transportation
* Vocational education and training
* Work-based learning
* Workplace readiness
* Any other areas that need to be addressed

For additional information, refer to VRSM C-100: Counseling and Guidance.

## C-1304: Coordination and Providing Information

When working with transition students, coordination with schools is an essential part of planning. The legislation referred to in this chapter explains the coordination that is required.

### C-1304-1: Legal Authority

#### 34 CFR 361.22 Coordination with Education Officials:

"(a) Plans, policies, and procedures. (1) The vocational rehabilitation services portion of the Unified or Combined State Plan must contain plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities that are designed to facilitate the transition of students with disabilities from the receipt of educational services, including pre-employment transition services, in school to the receipt of vocational rehabilitation services under the responsibility of the designated State agency.

(2) These plans, policies, and procedures in paragraph (a)(1) of this section must provide for the development and approval of an individualized plan for employment in accordance with §361.45 as early as possible during the transition services process and not later than the time a student with a disability determined to be eligible for vocational rehabilitation services leaves the school setting or, if the designated State unit is operating under an order of selection, before each eligible student with a disability able to be served under the order leaves the school setting.

(b) Formal interagency agreement. The vocational rehabilitation services portion of the Unified or Combined State Plan must include information on a formal interagency agreement with the State educational agency that, at a minimum, provides for—

(1) Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;

(2) Transition services by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitate the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;

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

(4) Procedures for outreach to and identification of students with disabilities who are in need of transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition services process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

(5) Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 with regard to students and youth with disabilities who are seeking subminimum wage employment; and

(6) Assurance that, in accordance with 34 CFR 397.31, neither the State educational agency nor the local educational agency will enter a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which a youth with a disability is engaged in work compensated at a subminimum wage.

(c) Construction. Nothing in this part will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) of a local educational agency or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to children with disabilities within the State involved."

#### Labor Code 352.108

"Coordination with Texas Education Agency:

(a) For purposes of this section, "transition services" means services provided to students with disabilities to assist the students in making the transition from secondary school to postsecondary education programs or competitive integrated employment.

(b) The commission and the Texas Education Agency shall collaborate to develop a mechanism to identify the areas of the state with the greatest needs for transition services for students with disabilities. The mechanism must account for the commission's limited resources and a school district's needs, including:

(1) the school district's resources for special education;

(2) the number of students with disabilities in the school district; and

(3) other factors that the commission and the Texas Education Agency consider important.

(c) The commission and the Texas Education Agency shall update the mechanism developed under Subsection (b) on a periodic basis.

(d) The commission shall develop uniform, statewide policies for transition services that include:

(1) the goal that a transition counselor initiate contact with a student approximately three years before the student is expected to graduate from high school;

(2) the minimum level of services to be provided to a student at the time that a transition counselor initiates contact with the student;

(3) standards, based on the mechanism developed under Subsection (b), for assigning a transition counselor to a school that ensure consistency among regions but that are not too restrictive;

(4) expectations for transition counselors to develop relationships with school personnel, including the employee designated to serve as the school district's designee on transition and employment services under Section 29.011(b), Education Code; and

(5) expectations for regional commission staff to work with education service center representatives on a regular basis to identify areas of greatest need and to discuss local strategies for coordination between transition counselors and schools.

(e) The commission and the Texas Education Agency shall enter into a memorandum of understanding to comply with the policies under this section and to improve coordination between the agencies. The memorandum of understanding must include:

(1) strategies to better inform transition clients, clients' families, and school personnel regarding the commission's available services and contact information for commission transition counselors; and

(2) a process to be used by the commission and the Texas Education Agency to develop and update the mechanism used to identify students who may need services."

The TVRC must provide to the student, parent, and school personnel information that describes the:

* purpose of the VR program;
* application processes for VR services;
* eligibility criteria for VR services; and
* scope of services that may be provided to eligible customers.

Specifically, the TVRC must ensure that families and students with disabilities are informed about their options and opportunities to choose methods and providers for delivery of all needed assessments, as well as decisions related to developing a plan of services. This leads to a foundation of information from which families and students can make informed choices about a coordinated plan of services for students to successfully transition to postsecondary activities and employment outcomes.

For additional information, refer to VRSM B-200: Processing Referrals and Applications.

## C-1305: Providing Transition Services

Transition services are not separate from VR services; they are a strategy of VR services designed to help students and youth with disabilities make the best use of VR services to achieve a successful vocational outcome. Services can be provided to individuals who are eligible or potentially eligible. Not all students who are referred and are potentially eligible will be eligible for VR services. When students are not eligible, they should be referred to other relevant community resources.



Figure 1 depicts the eligibility relationship between VR, VR transition services, and VR Pre-ETS. Figure 1 only explains eligibility. The figure illustrates that:

* Basic VR services include the full array of allowable services available to customers of any age that are documented in the IPE and are necessary for the customer to reach his or her vocational goal.  An individual must be determined eligible for VR to receive Basic VR services.
* VR transition services are for students AND youth with disabilities. VR transition services are broader than Pre-ETS, are for students and youth up to age 24, and are more like the full array of services offered in Basic VR. Transition services are aimed at supporting the transition of the student or youth to postsecondary education and employment. If the individual has reached the maximum age for Pre-ETS and is no longer eligible for Pre-ETS activities, as long as the individual has not reached age 25, the transition services listed above are available. This is also true for Supported Employment. An individual must be determined eligible for VR to receive VR transition services.

### C-1305-1: Core Skills

It is often impractical for younger students to participate in comprehensive assessments like those used for adults; therefore, when working with students age 14–16 and their families, including students who are grandfathered in (that is, current customers who applied before a policy change in the age range), the TVRC can assess the student by using the following resources:

* The TVRC's observations of the student
* The TVRC's notes on the student's participation in group skills activities
* Any insight provided by the family
* Any documentation provided by the school district

These resources provide information about the student's:

* abilities;
* interests;
* capabilities;
* communication skills;
* travel skills;
* adjustment to the disability; and
* other skills.

The TVRC uses the information when working with the family and student to:

* plan the student's VR program; and
* support the student's IEP at school, when appropriate.

The TVRC can also consider the following core skill areas to evaluate the student's confidence and competence:

* Adjustment to blindness
* Independent living
* Travel
* Communication
* Development of support systems
* Development of a vocation

For a thorough description and examples of these six core skill areas, see Texas Confidence Builders on the intranet.

The TVRC can use the Core Skills Assessment (CSA) checklist on the intranet for students who are blind or visually impaired, if appropriate; however, the CSA is only one element of the overall assessment process. It provides information that is considered equal to the information provided by orientation and mobility (O&M) reports, low-vision evaluations, reports documenting the ARD processes, and other similar reports.

When the CSA checklist is completed, the TVRC:

* documents important information and recommendations within the Comprehensive Assessment case note that is entered into RHW;
* does not enter a stand-alone case note for the CSA checklist; and
* files a hard copy of the CSA checklist and any reports or notes used during the comprehensive assessment phase in the paper case folder.

### C-1305-2: Trial Work for Transition

For complete information on trial work, see VRSM B-310: Trial Work.

### C-1305-3: Referral to a Vocational Rehabilitation Teacher

Services from a VR teacher (VRT) are available to help transition students who are blind achieve their independent living and vocational goals. These and other services help the student become competent in the core skill areas, become emotionally adjusted, learn to cope, and ultimately find their place in society.

VR teachers (VRT) are only available to students who are blind. Because a VRT is not required to assess individual transition-aged students, when the TVRC refers a student to a VRT, the TVRC must identify, within the description of the service record, the specific skill areas to be addressed, based on the information obtained through the CSA checklist and/or other assessments.

### C-1305-4: Child Labor Laws

When making decisions about work-based learning activities that include work experience, child labor laws must be observed.

#### Minors 14 and 15 Years of Age

There is no special work permit required for this age range, but there are restrictions on:

* the number of hours that 14- and 15-year-olds may work;
* the times that they may work; and
* the type of work that they may do.

For example:

* when school is not in session, minors may not work more than eight hours a day and 40 hours a week;
* when school is in session, minors may not work more than three hours a day on school days or 18 hours a week outside of school hours;
* during the school year, minors may work from 7 a.m. to 7 p.m. only; and
* in the summer (June 1st through Labor Day), minors may work from 7 a.m. to 9 p.m.

Limitations are placed on the work that 14 and 15-year-olds may do when they work in retail, food service, and gasoline service establishments.

#### Minors 16 and 17 Years of Age

There are no child labor law restrictions on the number of hours and times that 16- and 17-year-olds may work.

There are restrictions on working in occupations declared hazardous by the US Department of Labor.

For more detailed information on child labor laws, refer to [Texas Child Labor Laws](https://www.twc.texas.gov/jobseekers/texas-child-labor-law).

### C-1305-5: Assistive Technology

The LEA must provide assistive technology and assistive devices to meet the educational needs of secondary school students. The student may use the equipment at home to complete homework assignments and school projects.

In accordance with IDEA requirements, if the student's ARD committee determines that a student with a disability needs home access to telecommunications, sensory devices, or other technological aids to meet the requirements of a free and appropriate public education (FAPE), the LEA must provide the devices for home use in order to implement the student's IEP.

#### Technology Evaluation

Students who may need assistive technology to achieve their postsecondary goals can be sent for an assistive technology evaluation during their senior year of secondary school.

#### Necessity Requirement

The TVRC may purchase the assistive devices and assistive technology only if the items are needed for the student's postsecondary education or long-term employment.

Note: In general, assistive technology should be purchased with basic VR funds, not Pre-ETS funds. However, in some circumstances when assistive devices are necessary and reasonable for participation in a Pre-ETS, like a work-based learning opportunity, the counselor may be able to purchase the assistive technology using Pre-ETS funds for VR eligible students with an approved IPE.

Auxiliary aids and services may be purchased with Pre-ETS funds for students with sensory or communication disabilities who are participating in a Pre-ETS activity and need an auxiliary aid to participate. For questions about purchasing auxiliary aids with Pre-ETS funds, contact the Pre-ETS team by email. Examples of auxiliary aids include qualified interpreters, readers, material written in braille, screen readers, and auditory programs. See 28 CFR 35.104. These auxiliary aids and services can be purchased for both eligible and potentially eligible students.

#### Student Informed Choice

Assistive technology is changing rapidly. When appropriate, the VR counselor discusses the options with the student of having equipment purchased while the student is still in secondary school or waiting until after the student graduates.

If a student and TVRC agree to have equipment purchased while the student is still in secondary school and the assistive technology continues to meet the student's future employment needs, TWC may not be able to pay for more advanced technology at a later date.

#### Prior Consultation

To ensure that the school is unable to provide the assistive technology and that the appropriate funding is used, the TVRC must consult with the regional program specialist for transition services before any assistive technology purchases are made for the purpose of postsecondary education or employment before the student completes his or her senior year of high school.

#### Purchase Procedures

To purchase telecommunications, sensory, and other technological aids and devices, follow the procedures in RHW.

The justification for purchase in the case notes must clearly state that the assistive technology is being purchased for postsecondary education, long-term employment, or for participation in a Pre-ETS.

### C-1305-6: Providing Pre-Employment Transition Services

Under the Workforce Innovation and Opportunity Act (WIOA), vocational rehabilitation (VR) agencies are required to reserve and expend a minimum of 15 percent of their federal funding solely for pre-employment transition services (Pre-ETS).

Pre-ETS activities are provided to individuals who:

* meet the definition of a student with a disability; and
* are eligible or potentially eligible for VR services.

### C-1305-7: Student with a Disability

Based on federal regulations (34 CFR §361.5(c) (51)), in Texas, a student with a disability is defined as an individual between the ages of 14 [established by TWC and consistent with authority under 34 CFR §361.5(c) (51) (i)(A)(2)] and 22 who is:

* enrolled in a recognized educational program, which may include public schools (including charter schools), private schools, home schools, recognized post-secondary programs, or other recognized settings, such as the schooling provided by juvenile justice facilities;
* receiving services through the Individuals with Disabilities Education Act (IDEA) (Special Education); or
* considered eligible for Section 504 services (includes individuals who are receiving VR services).

Customers who meet the requirements above but who turn 22 years old before September 2 of the current fiscal year, no longer meet the definition of a student with a disability. For example, if a customer is 21 on September 2, he or she will meet the definition of a student with a disability until August 31 of the following year if he or she remains enrolled in a recognized educational program as described above. RSA provides the following guidance on what constitutes a recognized educational setting:

* Educational programming under the definition of a “student with a disability” would include programs that provide a recognized credential of education, such as a certified nursing assistant (CNA) program.

Graduating seniors in high school who will not be pursuing postsecondary training, or any other type of recognized educational program after high school, cease to meet the definition of a student with a disability upon graduation from high school; therefore, these individuals are not eligible for additional Pre-ETS. Graduating high school seniors who are attending postsecondary training or another recognized educational program in the subsequent fall term are still considered students with disabilities and remain eligible for Pre-ETS during the gap months of the summer, as long as they continue to meet the age requirement for a student with a disability. The following documentation should be used to document enrollment in a postsecondary program:

* Documentation that the individual with a disability graduated from secondary education
* Documentation that the individual with a disability has been accepted into a postsecondary educational institution or program
* Documentation of the individual's intention to enter the postsecondary institution or program or confirmation that he or she accepted the invitation to enter the postsecondary institution or program
* Documentation that the individual with a disability has been informed by the institution or program that a place is being held for the individual

Individuals who are eligible for VR but do not meet the definition of a student with a disability can receive individualized transition services and other VR services; however, they are not counted as recipients of Pre-ETS, and the services and goods must be paid for with Basic VR funds, not with Pre-ETS funds.

### C-1305-8: Types of Pre-Employment Transition Services (Pre-ETS)

The Workforce Innovation and Opportunity Act (WIOA) defines three types of Pre-ETS activities—required, coordinated, and authorized.

The five required Pre-ETS activities are as follows:

1. Career exploration counseling
2. Work-based learning experiences which may include in-school or after-school opportunities, or experiences outside the traditional school setting (including internships) that are provided in an integrated environment to the maximum extent possible
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
5. Instruction on self-advocacy, including peer mentoring

The four coordinated Pre-ETS activities are as follows:

1. Attending individualized education plan (IEP) meetings, when invited
2. Working with the Local Workforce Development Boards (Boards), Workforce Solutions Offices, and employers to develop work opportunities for students with disabilities
3. Working with schools to coordinate and ensure the provision of Pre-ETS
4. Attending, when invited, individual-centered planning meetings for students with disabilities who receive services under Medicaid (Title XIX of the Social Security Act)

The nine authorized activities are provided primarily by the VR state office and regional staff members; however, field staff may sometimes be asked to assist with these activities.

The nine authorized Pre-ETS activities are as follows:

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/or significant disabilities to live independently, participate in postsecondary educational experiences, and obtain and retain competitive integrated employment
3. Providing instruction to VR counselors, school transition staff, and others who support students with disabilities
4. Disseminating information about innovative, effective, and efficient approaches to achieving WIOA goals
5. Coordinating activities with transition services provided by local education agencies (LEAs) under IDEA (20 USC §1400 et seq.)
6. Applying evidence-based findings to improve policy, procedure, practice, and staff preparation to achieve WIOA goals
7. Developing model transition demonstration projects
8. Establishing or supporting multistate or regional partnerships that involve states, LEAs, designated state units, developmental disabilities agencies, private businesses, and other participants to achieve WIOA goals
9. Disseminating information and developing strategies to improve the transition to postsecondary activities for individuals who are members of traditionally unserved populations

In the final WIOA regulations, the RSA clarifies that Pre-ETS is a set of services intended to occur in the earlier phases of the career exploration and work preparation continuum. This is important to remember, as Pre-ETS can be provided or purchased for students with disabilities at any point in the VR process. For students who reach active services status, Pre-ETS activities must be based on the needs identified in the IPE. The primary focus is on experiences and learning opportunities for students with disabilities. While Pre-ETS required and coordinated activities can be provided in many phases of the VR process, Pre-ETS funds may not be used to provide services in the employment or post-employment phases of the VR process.

### C-1305-9: Funding

Purchases for customers and students are made with either Basic VR or Pre-ETS funding, depending on the type of purchase. The Pre-ETS Desk Aid on the intranet provides additional explanation and guidance on what is funded by Basic VR and what may be funded by Pre-ETS, tracking Pre-ETS time, and capturing Pre-ETS provided directly by counselors (at no cost). For eligible students receiving VR, it is also important to note that it may be necessary to access both Pre-ETS funding and Basic VR funding. Staff members are encouraged to use both types of funding to help the student achieve his or her vocational goal. For example, an eligible VR student is participating in a workplace readiness activity but needs hearing aids to ensure effective communication. Pre-ETS funds may be used to pay for the workplace readiness activity but not the hearing aids, because Pre-ETS cannot fund personal assistive devices. Basic VR would pay for the hearing aids. In February 2020, the Rehabilitation Services Administration (RSA) published a policy clarification that provided additional flexibility to states to allow the use of Pre-ETS funds for certain support good and services for students with disabilities who have been determined eligible for VR services. The same support services may not be purchased with Pre-ETS funds for potentially eligible students. For more information, please see the Pre-ETS Desk Aid, referenced above, or email the VR Pre-ETS mailbox.

Examples of these services include:

* transportation,
* maintenance,
* assistive technology,
* job skills training,
* personal attendant services,
* assessments, and
* food and lodging when it supports participation in a residential Pre-ETS program.

This flexibility to use Pre-ETS funding for supporting goods and services is not applicable for potentially eligible students.

Staff salaries are paid by Basic VR or Pre-ETS funding, depending on the activities that staff members perform. For example, if a transition vocational rehabilitation counselor (TVRC) provides a required or coordinated Pre-ETS activity to an eligible or potentially eligible student with a disability, then the TVRC documents the time spent providing the service, including related travel time, in the TWC Time Tracking System (TTS). Additionally, if any VR staff member participates in an authorized Pre-ETS activity, that time also must be documented in TTS; it should be noted that all related travel time and costs for participating in authorized Pre-ETS activities must be charged to Basic VR and not to Pre-ETS. For additional information and guidance, see the Pre-ETS Desk Aid: Pre-ETS Time Tracking Guidance on the Transition services intranet page.

When uncertainty exists about whether to enter an activity into TTS, staff consults with the VR supervisor or submits an inquiry to the VR Pre-ETS mailbox.

### C-1305-10: Working with Potentially Eligible Students

To receive Pre-ETS and be considered potentially eligible for VR services, an individual must meet only the definition of a student with a disability. The individual does not have to apply for VR services, unless the individual chooses to do so. The purpose of the potentially eligible designation is to give more students with disabilities the opportunity to participate in Pre-ETS. VR requirements are only applied for services provided to VR-eligible customers. The only VR requirements that are applied to potentially eligible individuals are informed choice, confidentiality, and access to the client assistance program (34 CFR §361.38, §361.52, and §361.56). Potentially eligible students are not subject to Basic Living Requirements or other cost sharing requirements.

Students who are potentially eligible may receive a single Pre-ETS or multiple Pre-ETS according to their need and desire to participate. Providing or purchasing Pre-ETS for potentially eligible students is not intended to be an avenue to circumvent the VR process, and at some point, a potentially eligible individual may need VR services that Pre-ETS cannot fund, such as durable medical equipment or tuition. Generally, and as a best practice after the provision or purchase of a Pre-ETS, the TVRC or VR counselor assigned to a potentially eligible case should counsel and provide the student with appropriate information related to the following options:

* The individual may continue as a student who is potentially eligible and able to access additional Pre-ETS;
* The student may apply for the full array of VR services, which include additional Pre-ETS and Transition services, as needed; or
* The VR counselor may close the case if the student does not wish to access additional Pre-ETS or to apply for additional VR services.

To access VR services, a potentially eligible individual must apply for VR, be determined eligible, and have an IPE for provision of the additional VR services.

As long as the individual meets the definition of a student with a disability, the individual will continue to be potentially eligible until the age requirements are exceeded or the individual applies for VR services and eligibility is determined. If a potentially eligible student has completed the VR application process and has been determined ineligible, the provision of Pre-ETS stops, and he or she is no longer considered potentially eligible.

WIOA requires VR to document specific data (listed below) for anyone receiving Pre-ETS. This requirement differs, depending on whether the customer has been determined to be potentially eligible or eligible for VR. The data required for a student with a disability who is requesting or participating in Pre-ETS activities and has not applied for VR services can be captured on the Form VR1820, Request to Receive Pre-Employment Transition Services form, which includes fields for entering the student's:

* Social Security number (preferable if available) or another unique identifier such as a student school identification number, a state-issued identification card number, or driver's license number;
* date of birth;
* race (required if student is in secondary education);
* ethnicity (required if student is in secondary education); and
* student's disability (as indicated in supporting documentation listed below).

Applicable release forms must also be obtained to allow the exchange of information and establish parental permission to participate in services.

The completed VR1820 and release forms paired with verification of disability from the list below completes the paperwork needed to begin providing Pre-ETS. Supporting documentation that is required to verify the student's disability may include the following:

* Case notes documenting VR counselor observations, review of school records, and statements of education staff
* A signed statement from a school professional with the identification of a student's disability and school enrollment status (A template of the VR Disability Verification Letter is available to capture this information.)
* A copy of an IEP, Social Security Administration (SSA) beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination, or documentation relating to Section 504 accommodations

Note: When a potentially eligible student is participating in a work placement as part of work-based learning, whether paid or unpaid, the requirements established in VRSM B-204-2: Customer Identification and Authorization for Employment for documentation of legal status to work in the United States must be met. However, for all other Pre-ETS activities, only the information listed above and found on the VR1820 is required for potentially eligible students.

An activity is considered a work placement when it is treated as an employment relationship and when paperwork (for example, Form I-9, Employment Eligibility Verification (I-9)) becomes part of the process.

Examples of work-based learning placement include:

* internships
* apprenticeships
* volunteer opportunities where the employer requires paperwork
* placements through Paid Work Experience or Work Experience

Other activities that would normally be considered work-based learning but do not require that an employment relationship be established are allowable for potentially eligible students who do not have employment authorization documents. Some typical examples are:

* job shadowing;
* informational interviews; and
* tours of businesses.

For information about paper case file requirements for potentially eligible students, refer to VRSM D-303-1: Two Sided or Six-Sided Case Files.

The TVRC or VR counselor assigned to the potentially eligible case must enter case notes in RHW that document information about the student, justification for services, progress, and outcomes. This may be one case note or multiple as the counselor continues to work with the student. Topics that must be documented, when applicable, are:

* a description of the disability, functional limitations, and counselor observations;
* a record of the disability from the student’s perspective;
* counseling and guidance and other Pre-ETS provided directly by the VR counselor;
* a service justification case note that indicates the planned services, including the type of, and rationale for, Pre-ETS; and
* the skills gained, as well as other progress made by the student as a result of receiving Pre-ETS.

VR counselors can enter data for and track potentially eligible students as well as issue payment for purchased Pre-ETS in ReHabWorks (RHW). For additional assistance and guidance on purchasing for potentially eligible students, see the Pre-ETS Desk Reference 2 on the intranet.

### C-1305-11: Capturing Pre-Employment Transition Services Activity in ReHabWorks

In addition to tracking preemployment transition services (Pre-ETS) staff time and funding, it is essential to capture and document the number and type of substantial Pre-ETS being provided to each student by entering in ReHabWorks (RHW) a provided services service record (SR) or a Pre-ETS activity record for provided, arranged, and purchased Pre-ETS. For guidance on these processes, please see the Pre-ETS Desk Aid: Tracking Pre-ETS and the Guide for Creating Pre-ETS Activity Records on the intranet.

An SR for provided Pre-ETS should be entered and used only by the in-house VR staff, such as vocational rehabilitation teachers, employment assistance specialists, and orientation and mobility instructors, who typically serve blind and visually impaired students. VR counselors and transition VR counselors (TVRCs) should not use the SR tracking method and instead should capture and track all Pre-ETS (arranged, provided, and purchased) via the Pre-ETS Activities functionality in RHW.

For example, when a TVRC provides career exploration counseling to a student during a counseling and guidance session, the Pre-ETS Activity functionality in RHW should be used. For more information and examples of entering Pre-ETS activity records, see the Guide for Creating Pre-ETS Activity Records.

For in-house providers, more information, and examples of entering provided Pre-ETS SRs, see the Pre-ETS Desk Aid on the intranet.

### C-1305-12: Case Note Documentation

Case notes for students who receive transition services must also include the following components unique to transition services:

* Documentation of career exploration activities
* Family involvement in making informed choices
* Collaboration with school partners
* Use of comparable benefits provided by the school or other partners

When documenting Pre-ETS in a RHW case note, select the appropriate topic (such as Counseling and Guidance or Service Justification) and check the "Pre-ETS" box.

For additional information about required documentation, refer to VRSM E-300: Case Note Requirements.

### C-1305-13: Group Skills Training

At times, it is more effective for the student and more efficient for the program to bring groups of individuals with disabilities together to teach a set of vocational skills. These activities are known as Group Skills Training (GST) and are intended specifically for students with any disabilities (see 34 CFR §361.5(c) (51)). A GST has an agenda, defined start and end dates, and specific learning objectives. For every GST, VR staff must be able to clearly state what the students will learn and be able to accomplish after participation.

GST sessions focus exclusively or primarily on providing one or more of the following five required Pre-ETS activities (34 CFR §361.48(a)(2)):

* Job exploration counseling
* Work-based learning experiences, such as in-school or after-school opportunities, or experiences offered outside of traditional school settings (including internships), in an integrated environment to the maximum extent possible
* Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs
* Workplace readiness training to develop social and independent living skills
* Instruction in self-advocacy, which may include peer mentoring

GST sessions are designed by VR staff and often include multiple Pre-ETS. They may be conducted by VR staff and may also include other providers, such as an employment services provider (ESP). Often, a GST requires multiple types of purchases, and staff must follow all applicable procurement and purchasing requirements. For example, an ESP, an external speaker, and lodging each entail different purchase requirements.

Note: When purchasing Work Experience Services through an ESP, transition educator, or a nontraditional provider for a student participating in a GST, the Work Experience Plan does not have to be completed.

To the greatest extent possible, each GST must be designed to maximize use of Pre-ETS funds and minimize the need for Basic VR funds. For example, a day program that is focused primarily on delivery of Pre-ETS activities and that uses facilities that VR can obtain at no or minimal cost maximizes use of Pre-ETS funding. It is acceptable for a combination of eligible and potentially eligible students to participate in GSTs. However, when potentially eligible students are participating, purchases for those students are limited to those allowed under the required Pre-ETS listed above. For VR eligible students, some additional VR services, like transportation, lodging, and maintenance associated with the GST are allowable for Pre-ETS funding.

Contracts may also be required for some GST activities, requiring staff to plan for GST sessions several months in advance to allow sufficient time for procurement, planning, and obtaining required approval. Partners may include education service centers, local colleges, Workforce Solutions Offices, Boards, the Texas School for the Blind and Visually Impaired, the Blind Children's Program under HHSC, Texas School for the Deaf, and other entities.

Each GST must have clear vocational goals with associated objectives to demonstrate how the activity will meet the goals.

For example, if the GST provides workplace readiness training, the objectives may include:

* developing the orientation and mobility required to navigate a city to reach a postsecondary school;
* developing communication skills, including appropriate interpersonal skills;
* attending team-building exercises in which individuals with different personalities are required to work together to create a product or achieve a result; and
* learning about appropriate work attire and etiquette.

A GST must not be a solely or predominantly social or recreational event, and the following training activities may be part of a GST but are not GSTs when provided as stand-alone trainings:

* A mini-immersion training conducted by the Criss Cole Rehabilitation Center
* Classes provided by VR teachers
* Training activities provided by an ESP, such as Project Search, Vocational Adjustment Training, Personal Social Adjustment Training, or those provided through a Pre-ETS contract

When a GST is conducted over several days or weeks, periodic recreational activities may be proposed to facilitate customer interaction and further prepare the student for the workplace (for example, focusing on social interaction, being comfortable in new environments and situations, promoting leadership and problem-solving activities during team-building exercises, and emphasizing the importance of collaboration).

To the extent possible, recreational activities for students who are blind or visually impaired may be designed using the approach known as Structured Discovery Cane Travel (SDCT), as well as other methods that challenge the participants. SDCT instruction includes nonvisual techniques, problem-solving strategies, experiential learning, and confidence-building experiences.

Eligible students who attend a GST must have goals in their IPE that make participation in the specific GST necessary for their vocational development. If goods and services other than the required Pre-ETS activities must be purchased for the eligible student to participate in the GST, those purchases must be:

* documented in the student's IPE;
* necessary to perform the actual activity or task, or to achieve the goal of the GST; and
* reasonable, meaning that the cost does not exceed fair or market cost for purchases made under the same or similar circumstances.

In short, the purchase of food, transportation, lodging, clothing, or backpacks (or similar types of purchases) for any GST must be necessary and reasonable.

These supporting goods and services are allowable Pre-ETS expenditures for VR eligible students only.

If it is advisable for students to wear a T-shirt that identifies them with a VR group when students participating in a GST are in a public setting, the T-shirts must be reasonably priced and must be plain, as the additional cost of printing on the shirts is not permitted. The purchase of T-shirts must follow all applicable procurement and purchasing requirements, and documentation must be retained to justify the purchase.

For information on purchasing food, refer to VRSM D-213-6: Food Purchased for Customer Training.

#### Planning a Group Skills Training

Planning is essential for developing and providing a high-quality GST for students. The Pre-ETS Group Skills Training (GST) Template for Group Skills Training proposals is on the Transition services intranet page and available to assist staff and to facilitate the management approval process.

While it is expected that most GSTs proposed by staff will be accommodated by the template, staff may alter the template to propose other types of training if:

* the proposed GSTs meet all requirements established in policy; and
* all required elements of the template remain

When completing a GST template, staff may refer to examples of activities provided by the [Workforce Innovation Technical Assistance Center: What are the required Pre-Employment Transition Services?](http://www.wintac.org/topic-areas/pre-employment-transition-services#required_preemployemnts)

#### Group Skills Training Application, Review, and Contract Processes

The GST application, review, and contract processes are as follows:

1. Each August, the VR state office provides to VR field staff a list of the approved GSTs from earlier in the fiscal year. VR staff members review the list, discuss with the relevant VR Manager the GST proposals that are being submitted for consideration in the upcoming fiscal year, and provide an initial response with Regional Director approval to the VR state office's list by September 15. If more than one region is involved, all RDs should provide approval.
2. For new and repeating GST activities, designated VR state office staff members review the proposal to ensure compliance with policy and submit the template and supporting documentation to the VR deputy division director for Field Services Delivery and the VR director.
3. The VR deputy division director for Field Services Delivery and the VR director review the proposed GST. When necessary, the VR director consults with executive management before approving the GST.
4. The VR deputy division director for Field Services Delivery notifies the regional director as to whether the GST proposal has been approved.
5. The regional director notifies the VR Manager.
6. The VR Manager ensures that designated VR staff implements the GST as approved and follows all required policies and procurement processes.
7. VR staff must have approval for a GST before goods and services are procured, before contracts are developed, and before commitments are made to students, families, and potential partners.

If a student from one unit or region can benefit from participating in a GST that is planned by another unit or region, the student's VR counselor must hold a staff meeting with the other appropriate unit or regional staff to discuss the activity and coordinate participation for the student. In some cases, the requesting VR counselor’s participation in the GST may be necessary; this participation is contingent on approval from the RD if travel is required outside the region.

VR Managers and Regional Directors are responsible for ensuring that GST proposals are complete, accurate, and fully compliant with policy before submitting them to State Office for review and approval.

After a GST is conducted, the VR Manager is also responsible for reviewing the GST budget and planned activities to evaluate whether the activities were effective and well executed, whether the participants achieved the learning objectives, and to compare budgeted versus actual costs. The VR Manager should document the results of the review, retain them for future GST planning, and provide them to TWC and regional management upon request.

#### Approval Time Frames

If all required information is included in the initial submission, a GST may be approved by the VR Division Director within two weeks of submission to the Pre-ETS mailbox. If information is incomplete, inaccurate, or not compliant with policy, the approval process will be delayed until the proposal is revised to meet all requirements.

Staff submits GST proposals as far in advance of the proposed GST as possible. Where contracts must be executed, the contracting process must follow approval of the GST by executive management. Staff must allow at least four months for the contract development and execution process.

#### Family Member Participation

Depending on the goals of the GST, participation by parents or guardians may be essential for the student to receive the benefit of the training activities.

Family members may participate in GSTs when:

1. the GST activities are designed to include the parents or guardians as part of the skill attainment process during the GST and thereafter;
2. the primary purpose of the GST is to provide education, training, and resources to the student and parents and/or guardians; or
3. the parent must attend to provide attendant care for a student who requires such care to participate.

If a parent's and/or guardian's participation is necessary for a GST, the TVRC and VR Supervisor must:

* consider whether more than one parent or guardian is needed to participate; and
* justify the need in the program description.

Another family member may participate in the GST in place of the parent or guardian.

#### Budget

The VR Manager must consider the anticipated costs associated with a GST and develop a proposed budget. Most of the proposed costs would be attributed to Pre-ETS. When necessary, the budget may contain supporting costs attributed to either Pre-ETS or Basic VR. The proposed budget on the GST template identifies which costs are attributed to Pre-ETS and Basic VR.

#### GST Site

Facility and room rentals, as standalone purchases, are typically not allowable Pre-ETS expenditures. All GST sites must be accessible, according to the standards established by the Americans with Disabilities Act (ADA). When a contract or written agreement is required to rent a room or facility, all approval and procurement processes must be followed.

#### Contracts

Contracts that are necessary for one or more GST activities must:

* be developed with and approved by TWC Procurement and Contract Services; and
* comply with TWC policy and state and federal law.

The VR Manager must ensure that at least four months are allowed for the contract development and execution process.

#### Lodging

Lodging costs are only an allowable Pre-ETS expenditure for VR eligible students, so GST activities should be planned only when it is reasonable and necessary for participation.

When lodging is necessary for the GST, and family member participation is also proposed, the VR Manager must carefully consider whether it is necessary for more than one family member to participate.

The VR Manager must also consider that it is generally easier to supervise students in camp or dormitory settings rather than at a hotel. If more than 10 hotel rooms are needed, the VR Manager must first obtain approval from the VR Division Director and then coordinate with TWC Conference Planning at ConferencePlanning.Media@twc.texas.gov.

#### Materials

The VR Manager must allow sufficient time for the approval, printing, and mailing of outreach and other materials necessary for the GST. Materials such as brochures and flyers must provide all essential information. Applications must include mandatory signatures. All printed materials must be provided in an accessible format.

Staff must follow the External Publications and Procedures guidelines found on the VR Standard Operating Procedures intranet page.

#### External Presenters and Contributors

When external presenters and contributors of in-kind resources (such as free lodging or meeting space) are an option, presenters or vendors must be approved through TWC Conference Planning at ConferencePlanning.Media@twc.texas.gov.

Gifts or donations valued at $500 or more must follow TWC's procedures for the acceptance of gifts. Refer to Section 1.9 of the TWC's Personnel Manual regarding Ethics/Standards of Conduct on the intranet for more information related to gifts made to a TWC employee.

#### Partners

The VR Manager must allow sufficient time to work with partners who may be part of the GST. Regardless of who the partners are, the GST must meet the requirements of this policy and must focus predominantly on required Pre-ETS activities.

#### Consent Forms

For students applying to participate in a Pre-ETS GST, the VR1827, Medical Information and Consent to Participate form should be used to capture the following with their application:

* Permission to participate signed by a parent or legal guardian
* A signed emergency medical release
* Emergency contact information
* Written permission for transporting the student, if relevant

Providing a photograph of the student is optional.

If the GST is to be held overnight, students must include the following information on the VR1827, Medical Information and Consent to Participate form, when applicable:

* A list of the medications that the student takes
* A statement from the student, parent, guardian, or a doctor indicating whether the student can monitor his or her own medication
* Information about the student's medical conditions
* A list of the student's allergies (medication- or food-related)
* A statement that explains the relevance of the GST to the student's IPE

#### Student Safety and Supervision

The VR Manager must ensure that there is a safety system to ensure that all students are accounted for and are transported safely. For example, the VR Manager may:

* hire a security guard, nurse (for example medication assistance), certified life guard, or licensed commercial driver, if a TVRC determines that there is a need; or
* make cell phones available in vehicles that transport students;

The amount of adult supervision needed varies depending on the type of event and the needs of the students. When a training activity does not include parents, at least one adult must be in attendance for every six adolescent students. In some circumstances, there may be a need for a higher staff-to-participant ratio.

#### Post-Group Skills Training Follow-Up

Once the training is completed:

* the VR counselor documents the student's participation and the GST training activities in a case note in RHW and explains how the GST is meeting the student's needs;
* the VR Manager reviews the GST to:
	+ evaluate whether the activities were effective and well-executed;
	+ evaluate whether the participants achieved the learning objectives; and
	+ compare budgeted versus actual costs.
* the VR Manager must document the results of the review, retain them for future GST planning, and provide them to VR regional management upon request.
* The VR State Office may request from VR regional management a summary of activities in their region annually.

### C-1305-14: Dual Credit Courses

Dual credit offers high school students at select high schools the opportunity to participate in college coursework while enrolled in high school. These students can earn up to 60 college credit hours. The list of approved high schools can be found on the [Texas Education Agency (TEA)](https://tea.texas.gov/ECHS/) website. Comparable benefits should be considered before sponsorship for dual credit is purchased. Comparable benefits may include funds available through the school.

Early College High Schools:

* may provide dual credit at no cost to students;
* offer rigorous instruction and accelerated courses;
* provide academic and social support services to help students succeed;
* increase college readiness; and
* reduce barriers to attending college

Because students are concurrently attending high school and college courses, it is normal for these students to be carrying less than a full-time course load.

### C-1305-15: Temporary Learning Experience

Temporary learning experiences include Pre-ETS funded activities such as camps, seminars, workshops, and conferences. For temporary learning experiences, submit information about the activity to VR.Pre-ETS@twc.texas.gov. A contract will be required with the provider if the costs related to an approved Temporary Learning Experience exceed $10,000. For more information, refer to VRSM D-209: Types of Purchases.

### C-1305-16: Camps

Camps can increase a student's self-confidence by providing opportunities for the student to participate in challenging activities. Camps generally focus on career exploration activities or increasing the student's vocational and work readiness skills to prepare the student for other VR services in the future. Each camp must have clear vocational goals with associated objectives to demonstrate how the activity will meet the goals. A camp must not be a solely or predominantly social or recreational event.

Camp-related expenses can include costs that are considered Pre-ETS (such as career exploration) as well as related costs that are also considered Pre-ETS (such as travel, room, and board) for VR eligible students.

### C-1305-17: Workshops and Seminars

Seminars and workshops may be held for a few hours or a few days.

Topics may include focus areas such as making the transition from school to work, driving with low-vision aids, succeeding in college, and the services provided by guide dogs.

Depending on the subject, the topics may or may not be considered Pre-ETS.

### C-1305-18: Pre-ETS as a Contract Type

Pre-ETS as a contract type allows a provider to combine the five required Pre-ETS, within certain parameters, when doing so does not meet the standards for other contracted services. For more information about Pre-ETS contracts, please see VR-SFP Chapter 15: Pre-Employment Transition Services.

## C-1306: Pathways to Careers Initiatives

### C-1306-1: Summer Earn and Learn

Summer Earn and Learn (SEAL) is a statewide strategy that includes employability skills training and paid work experience for students with disabilities. It is offered in each of the 28 local workforce development areas (workforce areas) during the summer, when students are out of school. Participants in SEAL must meet the definition of a student with a disability, including current VR customers and those who may be potentially eligible for VR services. Most employers prefer students to be at least 16 years old to participate in work experience; however, some employers, particularly those in the public sector, may be willing to offer work experiences for younger students.

Additionally, students must meet the following conditions:

* Exhibit behavior that is appropriate for a work setting. If the student has, at times, displayed behaviors that are not work-appropriate, the student should be able to be redirected with minimal intervention.
* Be receptive to counseling and guidance about the importance of appropriate workplace behavior.
* Be motivated to participate in the work-based learning program.

If a participant in SEAL needs services to access the program or support successful participation, such as sign language interpreting or Work Experience Training, these support services can be purchased with Pre-ETS funding.

When purchasing Work Experience Services through an ESP, transition educator, or a nontraditional provider for a student participating in SEAL or a GST, the Work Experience Plan does not have to be completed.

Other support services, such as transportation or maintenance, may be purchased with Pre-ETS funding and may only be provided for eligible participants, not for potentially eligible participants.

#### Social Security Beneficiaries in SEAL

VR counselors must consider the effects of SEAL wages on students' Social Security benefits and provide information, as appropriate, to increase student understanding of and compliance with SSA reporting requirements. See VR Guidance Memorandum 19-03: SEAL and the Student Earned Income Exclusion (PowerPoint presentation) on the intranet under Program Operations for guidance on how wages will affect Supplemental Security Income (SSI) beneficiaries and Social Security Disability Insurance or Childhood Disability Benefits beneficiaries. For information on the Student Earned Income Exclusion for SSI beneficiaries, including how to submit relevant documentation to SSA, see VR Guidance Memorandum 19-03: Request for Student Earned Income Exclusion from SSA template on the Program Operations intranet page.

#### Roles and Responsibilities

TWC VR enters into contracts with each Board to:

* purchase work readiness (employability skills) training;
* identify work sites;
* arrange placement and monitoring; and
* pay student wages and associated costs for SEAL students.

Requisitions are generated in WRAPS, and invoices are submitted by the Boards to the Accounts Payable mailbox at appo@twc.texas.gov. Processing of invoices for payment will be handled by Accounts Payable staff. As mentioned earlier in this subsection, if additional supports on the work site are needed, including transportation, local VR staff are responsible for service authorizations for those services.

Local VR staff work in partnership with each Board via a joint planning committee to:

* identify students who might benefit from the program;
* conduct outreach and recruitment activities;
* identify worksites; and
* provide additional services that are necessary for the students to complete the program.

Although Boards are responsible for certain components and contract deliverables of SEAL, VR staff members are fully responsible for performing certain functions to support the program and ensure its success for participating students.

The VR counselor's primary role is to provide support. If an issue arises, the VR counselor is consulted to address and resolve the issue. Additional roles and responsibilities of the Boards and VR staff are discussed in the Board VR Requirements Chapter 1: Summer Earn and Learn.

### C-1306-2: Student HireAbility Navigator Program

The Student HireAbility Navigator program is a part of the expansion of the Pathways to Careers Initiative (PCI) approved by the Texas Workforce Commission (TWC) in 2017. The role of the Student HireAbility Navigator is to create strong partnerships between VR Workforce Solutions Offices, independent school districts, community organizations, employers, and others to expand and improve access to employment and training services and to increase employment opportunities for students with disabilities. Board VR Requirements Chapter 3: Student HireAbility Navigator Program, describes the roles, responsibilities, and payment structure for the Student HireAbility Navigator program.

Student HireAbility Navigators are employees of the Board or Board contractor. There is one Student HireAbility Navigator in each of the 22 small and midsize workforce areas and two Student HireAbility Navigators for each of the six large workforce areas. The six large workforce areas are Alamo, Greater Dallas, Gulf Coast, Lower Rio Grande Valley, North Central Texas, and Tarrant County. Each Student HireAbility Navigator serves as a resource in the workforce area to support, expand, and enhance the provision of Pre-ETS.

The Student HireAbility Navigators perform duties and provide deliverables in the following three areas:

* Capacity building and systems development
* Partnering and collaboration
* Informing and engaging employers

The goal of the activities within the three areas is to increase the likelihood that students with disabilities achieve independence and inclusion in communities and competitive integrated workplaces, as well as successful participation in postsecondary education experiences. If the Student HireAbility Navigator is not a Board staff member, he or she may assist with some direct services to students with disabilities as appropriate, although that is not the Student HireAbility Navigator's primary role. The primary role and responsibility of the Student HireAbility Navigator is not direct service delivery, but rather the planning, coordination, promotion, and development of systemic and collaborative strategies that result in the provision of quality Pre-ETS for students with disabilities in the workforce area.

Examples of the tasks performed by Student HireAbility Navigators include, but are not limited to:

* Creating a three-year action plan for the workforce area in consultation with the Board and VR offices, ISDs, and other community partners;
* Identifying the Pre-ETS resources available to students with disabilities in the workforce area;
* Promoting the use of career exploration, postsecondary education planning, and work-readiness tools available through TWC's Labor Market and Career Information department;
* Developing and/or disseminating information and resources to Workforce Solutions offices, VR offices, local education agencies, employers, community partners, parents, and students with disabilities;
* Developing effective and innovative strategies to improve the transition to postsecondary activities of students who are members of traditionally unserved and underserved populations (for example, homeschooled students) and expanding and enhancing the provision of Pre-ETS;
* Developing and coordinating events, campaigns, and other activities to increase and foster student and family awareness of and access to Pre-ETS;
* Providing information, training, and technical assistance to Workforce Solutions offices, VR offices, school districts, education service centers, community partners, and employers regarding resources and activities available to assist students with disabilities to transition successfully to postsecondary education/or employment;
* Providing training and/or resources to increase employers' awareness of disability etiquette and accommodations for students with disabilities; and
* Collaborating and serving as points of contact with partner agencies to develop work- based learning opportunities for students with disabilities, including internships, summer employment (for example, the Summer Earn and Learn program), pre-apprenticeships, and other employment opportunities available throughout the school year.

The Student HireAbility Navigator's role is intended to supplement the work done by VR counselors and staff, not replace it. Examples of how the two entities may work together may include:

* Providing information regarding the pre-employment transition services available to students with disabilities within the workforce development area;
* Supporting the Student HireAbility Navigator's efforts to develop and sustain relationships with the school districts and Education Service Centers in the workforce development area; and
* Contributing information needed for the development of the three-year action plan.

Refer to Board VR Requirements Manual Chapter 3: Student HireAbility Navigator Program for information about the roles and responsibilities of Boards and VR staff.

### C-1306-3: Explore STEM!

The Explore STEM! program is a partnership between Texas Workforce Commission–Vocational Rehabilitation (TWC-VR) and higher education institutions that provides week-long, nonresidential camps for students with disabilities during the summer months. The camps provide students exposure to the fields of science, technology, engineering, and math (STEM). During the camps, students interact with professionals who work in various STEM fields and participate in hands-on, interactive, and accessible activities. Explore STEM! participants learn about postsecondary training opportunities in the areas of STEM and necessary work-readiness skills.

The roles of VR staff are as follows:

* Work in partnership with higher education institutions to plan for and conduct outreach for the Explore STEM! program
* Identify and refer participants to the Explore STEM! program using VR1828, Referral Form to Explore STEM!, and review referrals received from institutions
* Provide disability awareness information to participating institution staff, if requested
* Provide counseling and guidance to participants regarding Explore STEM! participation
* Ensure that the service authorization is in place before the camp starts and that the invoice and report are received afterward for payment

For more information, please contact the Pre-employment Transition Services (Pre-ETS) mailbox at VR.Pre-ETS@twc.texas.gov.

### C-1306-4: Advise TX

Students with disabilities enroll in postsecondary higher education at substantially lower rates than students who do not have disabilities. To address this challenge, the Advise TX Innovation and Opportunity (Advise TX IO) program, administered in partnership with the Texas Higher Education Coordinating Board (THECB), enhances services to students with disabilities under the existing Advise TX program, which seeks to increase the number of low-income and underrepresented high school students who enter and complete postsecondary education. The program employs recent college graduates trained by one of four Texas partner universities (Texas A&M University, Texas Christian University, Trinity University, and the University of Texas at Austin) to serve as full-time, near-peer college advisers in high schools that have historically low college-going rates. Advisers provide one-on-one assistance to students to match their academic and career goals to optimal postsecondary options.

For Advise TX IO, each adviser is required to do the following:

* Undergo a six-week training program in college advising provided by one of the four partner universities
* Undergo additional training in working with students with disabilities and providing them instruction in self-advocacy (This training is conducted by TWC-VR and Educational Service Center staff.)
* Work for a period of no more than two years to maintain near-peer status
* Mentor and provide guidance to students with disabilities, including those who are potentially eligible for VR Pre-ETS and help each student who is interested in postsecondary education to identify options that best fit his or her academic and career goals as well as his or her accessibility and accommodation needs. Advisers will:
	+ mentor students on self-advocacy related to postsecondary education;
	+ provide guidance on how to research, select, and apply to colleges and technical schools;
	+ help with completion of financial aid (FAFSA/TASFA) applications;
	+ provide feedback on college essays;
	+ help interpret and compare financial aid award letters;
	+ help identify whether individual accessibility and accommodation needs might be sufficiently met at colleges of interest;
	+ coordinate college admission representative visits to high schools; and
	+ help coordinate student visits to college campuses.

For additional information on the referral process to the Advise TX Innovation and Opportunity program, including related costs, refer to the Advise TX IO Program page on the intranet.

### C-1306-5: Paid Work Experience

Paid Work Experience (PWE) is intended to increase work-based learning opportunities through Texas' integrated workforce system for VR participants who are students with disabilities.

TWC has executed fee-for-service contracts with the Boards to purchase wage payment services for students in PWE. PWE placements are for eligible or potentially eligible individuals who are students with disabilities. If the customer has been determined eligible, PWE is an identified service on the IPE. PWE, described in Board VR Requirements Chapter 2: Wage Services for VR Participants in Paid Work Experience, is a standalone service that is separate from the SEAL program.

PWE is available throughout the year and is authorized by VR counselors on an individual basis. Chapter 2 of the Board VR Requirements Manual describes the scope of work, responsibilities, deliverables, and payment structure for PWE services.

Through PWE services, Boards pay students' wages for time worked, thereby enabling students to be paid as they develop work skills that improve their career preparation and increase their employability.

Students are placed at the work site by TWS-VRS, which is responsible for monitoring each work site, providing case management, and providing counseling and guidance, as needed. TWS-VRS staff are responsible for ensuring completion of a work site agreement before the start of all PWE assignments. The work site agreement may be completed by TWS-VRS staff (or a contracted ESP, if applicable).

Form I-9 is used to verify the identity and authorization for employment of individuals who are hired in the United States. TWS-VRS staff may help students prepare the I-9. TWS-VRS staff members may sign the I-9 as a preparer or translator; however, they must be aware that they are attesting under oath that they have helped to complete the form and that, to the best of their knowledge, the information is true and correct. The Board or the Board contractor, whichever will be the employer of record, completes and signs the employer section of the I-9 before employment commences.

PWE assignments may not exceed 12 weeks per student per work site assignment (see VRSM C-421: Work Experience Services). Paid work-experience assignments may not exceed 20 hours per week per student. A student may be either an eligible VR customer or a potentially eligible customer participating in the work experience service. If the VR counselor determines that additional assignments will help a student with career exploration and development of work readiness skills, the student may participate in more than one PWE assignments.

Participation in PWE and WIOA Title 1 programs such as WIOA youth program work experiences is permitted. VR and Workforce Solutions Office staff must ensure that the services that are provided are complementary and not duplicative, and that both sets of services are documented in the student's RHW case, indicating which are purchased and which are arranged.

#### Staff Roles and Responsibilities for Paid Work Experience

TWS-VRS field staff are responsible for:

* Developing paid work-experience opportunities, placements, and work sites in the public and private sectors. TWS-VRS complies with the Board's exclusions and exceptions to the type of work sites or businesses. TWS-VRS staff is permitted to coordinate with each Board or contractor staff to identify work sites with which the Board has existing relationships.
* Participating in an initial orientation and coordination meeting with the Board and/or, as applicable, the Board's contractor, before initiating work experience services. TWS-VRS staff participation in the orientation meeting is determined by VR regional management.
* Purchasing work experience services from a TWC VR contracted Employment Services Provider (ESP) based on the significance of a student's impediments to employment and associated support needs. For additional information about work experience services delivered through an ESP, refer to VR Standards for Providers (VR-SFP) Chapter 14: Work Experience Services. ESPs do not provide wage payment services.
* Assisting the student with preparing any required I-9 paperwork. TWS-VRS staff may sign the I-9 as a preparer or translator; however, staff must be aware that they are attesting under oath that they have assisted in the completion of the form and that to the best of their knowledge the information is true and correct.
* Notifying Board staff or designated Board contractor staff of worksite incidents involving injury, property damage, or behavioral concerns that result in termination of the student's placement at the worksite as soon as possible and not later than 48 hours after the incident.
* Issuing a service authorization to the Board or designated Board contractor, authorizing Board payment of wages for a student (eligible or potentially eligible). With the service authorization, TWS-VRS staff includes a VR1990, Paid Work Experience Worksite Agreement. The work site agreement provides the following information:
	+ Student's name
	+ RHW Case ID
	+ Name and physical address of the work site
	+ Name of designated work site supervisor or contact person who will be responsible for signing or certifying the student's timesheets
	+ Contact information for the designated work site supervisor or contact person
	+ Work experience begin and end dates
	+ The student's projected work experience schedule
* Providing additional documentation or information as agreed and documented in the local coordination and referral procedures established by the Board and TWC-VR as described in Board VR Requirements Manual, Section 2.3.3 Paid Work Experience Eligibility. TWS-VRS staff must ensure that releases are completed before releasing confidential information.
* Timely processing of service authorizations and invoices from Boards. Payment is made to Boards for wages paid for actual time worked at the work site and for the other costs associated with payroll, including federal income tax withholding, Federal Insurance Contributions Act (FICA) expenses, workers' compensation insurance, and fees associated with payroll processing as described in the Board VR Requirements Manual Chapter 2: Wage Services for VR Participants in Paid Work Experience.
* Determining eligibility for participation in PWE services.
* Obtaining documentation and verifying that potentially eligible individuals meet the "student with a disability" definition. VR counselors must follow VRSM C-1305-10 regarding potentially eligible individuals.
* Providing case management services.
* Tracking the PWE to ensure that it does not exceed 20 hours per week and is not more than 12 weeks in duration

Boards are responsible for the following:

* Setting an hourly wage rate for the PWE component that is consistent with or based on the hourly wage the Board uses for PWE under the WIOA Title 1 Formula Youth Program. Wages must be paid in a timely manner and include the other costs associated with payroll processing.
* Notifying VR of the hourly wage rate that will be paid to students in PWE within 30 days of contract execution. They must include in their notification a description and breakdown of the other costs associated with payroll as described in Board VR Requirements Manual, Section 2.5.1 Allowable Costs.
* Notifying VR of the name and contact information of the contractor when contracting with another entity to perform all or part of the PWE services deliverables.
* Notifying VR of exceptions or exclusions to the type of work sites or businesses that may serve as a work site.
* Notifying VR 30 days in advance of changes in the Board's contractor, hourly wage rate, or other payroll costs, and of exceptions or exclusions to the type of work sites or businesses. If such changes are made, the hourly wage rate for a student may not be reduced during the student's PWE assignment.
* Conducting an orientation meeting with VR regional management before initiating PWE services. The orientation meeting must include the Board's contractors, if such contractors will perform functions under Board VR Requirements Manual, Chapter 2: Wage Services for VR Participants in Paid Work Experience. The purpose of the meeting is to:
	+ identify points of contact for the Board, Board contractors, and VR;
	+ review the Board's hourly rate and associated payroll costs;
	+ review the Board's exceptions and exclusions to the types of businesses or work site, if applicable; and
	+ establish procedures to facilitate local coordination and referral, including the information and documentation (I-9 and W-2 forms) that are necessary to permit a customer to receive wages (the Board must document the procedures and provide a copy to VR).
* Maintaining records for the participants, wages paid, and associated fees for PWE services.
* Submitting a complete invoice for payment, along with supporting documentation. Boards may invoice VR weekly, biweekly, or monthly based on the Board or Board contractor's payroll cycle or other billing cycle. TWC will make payment by direct deposit to each Board's account.
* Boards may refer potential students to TWC-VR and should provide appropriate referral documentation when doing so.

#### Purchasing Paid Work Experience

Specifications for PWE can be found in RHW under Pre-Employment Transition Services. RHW contains a set of specifications for each of the six VR regions, which include the 28 workforce areas. Level 4 specifications have rates specific to each Board. If the Level 4 specification does not show a unit rate for the Board, VR staff submits an email message to the Pre-ETS mailbox.

The unit cost for student wages is the hourly wage rate paid to the participant plus required taxes and insurance, plus processing and invoice fees. The wage service rates for each Board have been setup in RHW. For the payroll processing fee, setup fee, or invoice fee, VR staff must enter this information into RHW manually when building the service record. VR staff must know the number of pay periods that will take place during the service to enter the accurate fees for payroll processing. For additional information, refer to Board VR Requirements Manual, Section 2.5.5 Paid Work Experience Services Cost Calculations.

## C-1307: Participation in Cost of Services

### C-1307-1: Student Participation in the Cost of Training Seminars and GSTs

GSTs, seminars, workshops, camps, and work experiences are training activities related to Pre-ETS. The student is not required to contribute to the cost of these services, regardless of whether or not the customer's net income or liquid assets exceed the basic living requirements (BLR).

Students are expected to provide their own money for incidental expenses while participating in a GST or similar training or activity, but they will not be asked to participate in the cost of transportation, maintenance, or other supporting goods or services associated with the Pre-ETS training.

The TVRC may use any TWC-approved method for providing transportation to students. When available, transportation that is of no cost to TWC is used. If this is not available, the most cost-effective and reasonable method of transportation must be used.

### C-1307-2: Family Participation in Training Seminars and GSTs

When parents (or legal guardians) of eligible VR students participate in a training activity, including Pre-ETS, with the student to further the student's vocational adjustment or rehabilitation, the cost of the training is not subject to customer contribution requirements or BLR. However, these requirements must be applied for all incidental expenses and transportation costs for family members unless a parent or representative is required to participate in the activity for the student to attend.

If a parent and or representative is providing supervision or attendant care for their child in conjunction with a TWC-VR sponsored activity, any applicable transportation and food costs for one parent will be included in the training costs regardless of economic resources. These must be reasonable and the same costs that any participant in the GST would incur.

On a case-by-case basis, a waiver of the BLR criteria for an additional family member may be requested from the VR Manager when the parent and/or legal guardian is providing supervision or attendant care for the student.

### C-1307-3: Texas School for the Blind and Visually Impaired

A student attending the Texas School for the Blind and Visually Impaired (TSBVI) can be served by the TVRC located in the student's home community. The TVRC in the Austin region is available as a courtesy counselor on an as-needed basis.

### C-1307-4: Supported Employment

For complete information on supported employment policy, see VRSM C-1200: Supported Employment Services.

VR agencies are required to reserve 50 percent of their supported employment grant for students who meet the definition of a youth with a disability. The reserved grant funding can be used for successive benchmarks and services, once the youth has been placed in a job. VR can also provide or arrange for extended services to youth with disabilities for up to four years, or until the youth turns 25 years of age, whichever comes first. For the definitions of youth with a disability and extended services, see the VRSM Glossary.

If a student is likely to need ongoing support to find and keep competitive, integrated employment after completing secondary school, the TVRC can begin planning for supported employment (SE) services, as appropriate.

Planning for SE services allows the TVRC and the student to explore possibilities and the choice of:

* a SE provider;
* possible SE opportunities;
* customized employment techniques;
* additional diagnostics; and
* additional active services that may be needed for the student to successfully complete SE services.

The student remains on a transition caseload until:

* the student completes all worksite and other community-based training related to staying employed; and
* the case status is advanced to Benchmark 5: Job Stability.

When the case status is Benchmark 5: Job Stability, the student's employment status is considered stable and the case is transferred to a general VR caseload.

Note: Supported Employment services, including all benchmarks and extended services, are solely VR services and not considered to be Pre-ETS.

## C-1308: Transferring a Transition Services Case

For information on transferring a transition services case, see VRSM D-304: Transfer of Cases and Caseloads.