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

Revised July 1, 2019

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

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

WIOA requires TVRCs 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 TVRC 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 TVRC 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 B-300: Determining Eligibility, and for information on IPE development, see B-500: Individualized Plan for 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

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## C-1305: Providing Transition Services

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### 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.

#### 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 postsecondary 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 some of the same 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.

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.

#### 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 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 "braid" different 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.

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.

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.

#### 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 may not fund, such as psychological assessments, durable medical equipment, transportation, and 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 as the point of contact 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, 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 [VR1820, Request to Receive Pre-Employment Transition Services](https://twc.texas.gov/forms/index.html) 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);
* student's disability (as indicated in supporting documentation listed below);

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 referral form from a school requesting Pre-ETS activities with the identification of a student's disability, signed by a school professional, or parent, or guardian if the student is considered a minor (parental consent to participate in Pre-ETS is governed by state law and the policies of the educational programs and the designated state unit)
* 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 B-204-2 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

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 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. Topics that must be documented 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 Aid.

#### Capturing Pre-ETS Activity in ReHabWorks

In addition to tracking 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 a provided services Service Record (SR) in RHW. For guidance on this process, please see the Pre-ETS Desk Aid: Tracking Pre-ETS.

Caseload-carrying staff members (or their support staff) must create service records within seven days of the provision of a required or coordinated Pre-ETS. For example, a TVRC meets with a high school student to discuss postsecondary options and the related actions that are needed to prepare for transitioning to postsecondary training. A case note is entered in RHW to document the counseling and guidance that occurred, and an SR is entered to document the specific Pre-ETS provided (in this case, Counseling on Postsecondary Options). It is important to note that only a single SR per Pre-ETS category is needed each state fiscal quarter.

For more information and examples of entering Pre-ETS SRs, see the Pre-ETS Desk Aid.

### C-1305-7: 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 E-300: Case Note Requirements.

### C-1305-8: 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, while an event that requires lodging and paid meeting space requires significant expenditures of Basic VR funds. It is acceptable for a combination of eligible and potentially eligible students to participate in GSTs. However, when potentially eligible students are participating, purchases are limited to those allowed under Pre-ETS.

Note: Long-standing GSTs that are residential programs conducted during the summer months may still be considered for approval.

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.

The purchase of food, clothing, or backpacks (or similar types of purchases) for any GST must be necessary and reasonable.

Clothing, backpacks, and equipment are not allowable Pre-ETS expenditures since they are supporting goods. The need for purchase of any equipment must be individualized, necessary for GST participation, and documented in the student's IPE. Backpacks should be purchased only if they are necessary for the GST activities.

If it is advisable for students to wear a T-shirt that identifies them with a VR group when students 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 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. A GST planning and proposal template is 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%22%20%5Cl%20%22required_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.
2. 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.

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.

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.

#### 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.

If another family member asks to participate in the GST in place of the parent or guardian, the TVRC must obtain approval from the VR Manager.

#### 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 Basic VR. The proposed budget identifies which costs are attributed to Pre-ETS and Basic VR.

#### GST Site

Facility and room rentals 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 not an allowable Pre-ETS expenditure, so GST activities should be planned to limit the need for lodging, when possible.

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.state.tx.us.

#### 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 must provide all essential information. Applications must include mandatory signatures. All printed materials must be provided in an accessible format.

Staff may submit materials for TWC review and approval by either of the following methods:

* Completing the [Communications Service Request Form (PDF)](http://intra.twc.state.tx.us/intranet/comm/docs/communications-new-service-product-request-form-twc.pdf). The form is listed under Links on the [Communications intranet page](http://intra.twc.state.tx.us/intranet/comm/html/index.html).
* Emailing the materials to communications@twc.state.tx.us.

With the review request, the name of the VR Manager who approved the material must be included.

#### 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.state.tx.us.

Gifts or donations valued at $500 or more must follow TWC's procedures for the acceptance of gifts.

#### 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

Students applying to participate in a Pre-ETS GST must provide 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, 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; and

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;
* within 30 days, the host-counselor sends to the Pre-ETS mailbox a summary report that includes:
	+ the projected budget;
	+ the actual costs;
	+ the final number of participants;
	+ the name and case ID (or Social Security number) of each participant; and
	+ a summary of each participant's evaluations;
* 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.
* The VR State Office will request from VR regional management a summary of activities in their region annually.

### C-1305-9: GSTs that Involve More than One Management Unit and/or Region

GST sessions that will include students who are served by more than one management unit or region must be approved by the directors of the participating region or regions.

If a student from one unit or region participates in a training session that is sponsored by another unit or region, the student's TVRC may be asked to hold a staff meeting to discuss the activity; however, the TVRC's participation is contingent on approval from the VR Manager.

As with other GSTs, a description and budget for GSTs that are offered by more than one management unit or region must be submitted to the state office program specialist for Transition Services.

The state office program specialist reviews the proposed GST description and budget and facilitates final review and approval.

### C-1305-10: Additional Group Skills Training—Vocational and Work Readiness

Transition services provide a wide variety of training to help students with disabilities obtain the skills and experience they need to prepare for and make informed choices about whether and where to work and/or obtain a postsecondary education and where and how to live in the community.

Students who can benefit are given opportunities to participate in group skills training, workshops, camps, and seminars. Families may also be included in opportunities when their participation supports the student's VR needs. The opportunities provided vary by state fiscal year, region, and the customers' needs. (See C-1305-8: Group Skills Training.)

### C-1305-11: 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.state.tx.us.

### C-1305-12: 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 VR. 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 not considered Pre-ETS (such as customer travel, room, and board).

### C-1305-13: 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-1305-14: 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 only be purchased with Basic VR 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 GM 18-04 SEAL and the Student Earned Income Exclusion (PowerPoint presentation)](http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-04C-SEAL-SEIE-presentation.pptx) 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 GM 18-04 Request for Student Earned Income Exclusion from SSA template](http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-04D-SEIE-Request-SSA-Form.docx).

#### 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.state.tx.us. 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](https://twc.texas.gov/partners/board-vr-requirements/summer-earn-and-learn).

### C-1305-15: 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](https://twc.texas.gov/partners/board-vr-requirements/student-hireability-navigator) 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](https://twc.texas.gov/partners/board-vr-requirements/student-hireability-navigator) for information about the roles and responsibilities of Boards and VR staff.

### C-1305-16: 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. For those who are potentially eligible, the point of contact must enter a case note that the service was purchased with a multi-customer service authorization. PWE, described in [Board VR Requirements Chapter 2: Wage Services for VR Participants in Paid Work Experience](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience), is a stand-alone 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 [C-421 Work Experience Services](https://twc.texas.gov/vr-services-manual/vrsm-c-400%22%20%5Cl%20%22c421)). 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](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience%22%20%5Cl%20%22s02.3). 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](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience%22%20%5Cl%20%22s02.1).
* 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 C-1305-6 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 2.5.5 Paid Work Experience Services Cost Calculations.

### C-1305-17: 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-1305-18: 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](https://tea.texas.gov/ECHS/) ([TEA) website](https://tea.texas.gov/ECHS/). 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, however, approval by the VR Manager is required for a student to be enrolled in less than a full time course load as defined by the college or university.

## C-1306: Participation in Cost of Services

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### C-1306-2: Family Participation in Training Seminars and GSTs

When parents (or legal guardians) participate in a training activity 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 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.

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## C-1308: Transferring a Transition Services Case

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