



issue brief

# vr&youth

Rehabilitation Research & Training Center



## State Vocational Rehabilitation Agencies' Early Implementation Experiences with Pre-Employment Transition Services

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Recognizing that early exposure to career opportunities can lead to better adult employment outcomes,<sup>1</sup> in 2014, as part of the Workforce Innovation and Opportunity Act (WIOA), the federal government mandated that state vocational rehabilitation (VR) agencies make pre-employment transition services (Pre-ETS; Figure 1) available statewide to all students with disabilities in their respective states who may need them.

The WIOA requirements represent a significant change for VR agencies. The requirements call for an expansion of the traditional VR student population to include potentially eligible students with disabilities who are not clients and who have not applied for VR services. For many agencies, Pre-ETS are an expansion of the services they have historically offered transition-aged youth clients. Recognizing this tremendous change, in early 2017 the National Council on Disability (NCD) fielded a survey to 25 VR agencies that identified a number of challenges that they were experiencing in implementing the WIOA regulations (NCD 2017).

This brief builds on the NCD’s findings by sharing state implementation experiences through 2017. We use qualitative information from ten state VR agencies<sup>2</sup> and quantitative data from seven agencies<sup>3</sup> located across the country. We present examples of partnerships, service delivery, and staffing for Pre-ETS. This brief allows VR administrators a way to put their own experiences in the context of other agencies’ experiences, which may help them generate ideas for innovations in Pre-ETS delivery within their agencies. Our findings confirm those identified by the NCD that agencies have faced a number of challenges in implementing Pre-ETS. However, we also find that agencies have made considerable progress in developing innovative strategies to expand the services they offer and the populations they serve.

**Figure 1. Required Pre-ETS**



*Source:* Adapted from WINTAC 2016

## What strategies have VR agencies pursued to meet the WIOA requirements for Pre-ETS?

WIOA, which was signed in 2014, amends the Rehabilitation Act of 1973 and requires VR agencies to do the following:

1. Make Pre-ETS available to all students with disabilities,<sup>4</sup> usually 14–21 years of age, who are eligible or potentially eligible for VR services and are enrolled in a recognized education setting
2. Not replicate or replace transition services that schools already provide under the Individuals with Disabilities Education Act (IDEA)

3. Report on Pre-ETS delivery quarterly to the Rehabilitation Services Administration (RSA), beginning in the third quarter of federal fiscal year 2017
4. Reserve at least 15 percent of their federal funding for Pre-ETS

Below we describe the strategies that the agencies we studied have pursued to meet these requirements, including needs assessments, partnerships with schools and other organizations, and new methods for recording data on Pre-ETS delivery. Although all agencies are expanding their service offerings and the populations they serve, some agencies prioritized among the required changes, while others attempted to implement them all simultaneously.

### **Requirement 1. Make Pre-ETS available to all students with disabilities who need them**

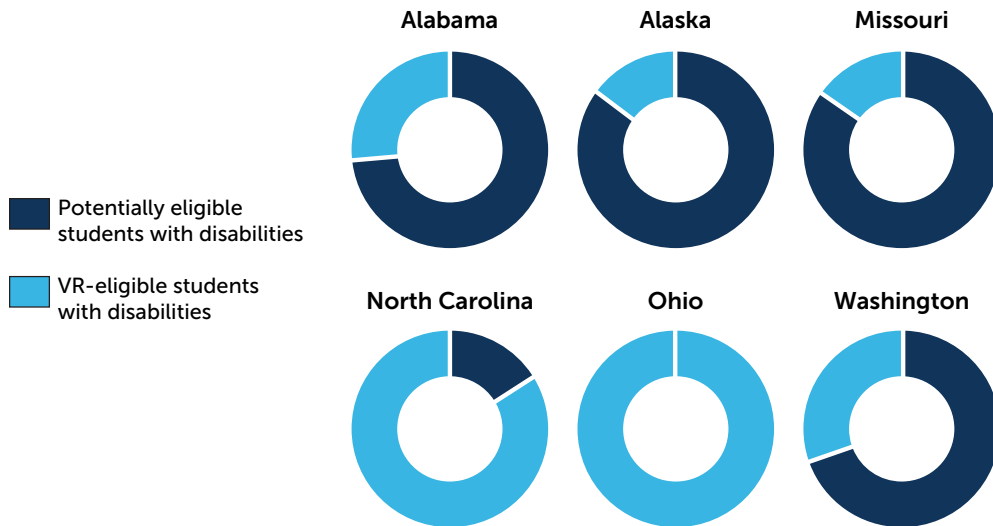
WIOA mandates that Pre-ETS be made available to all students with disabilities who need them, most of whom may not be VR clients but are potentially eligible for VR services. This mandate significantly expands agencies' traditional target population.

Agencies have sought to serve this new population while also providing services to their more traditional VR-eligible youth population. Four of the ten agencies we studied (North Carolina, New Jersey, Ohio, and Texas) described focusing their initial implementation efforts on delivering Pre-ETS to VR-eligible students only, whereas the remaining states attempted to serve both eligible and potentially eligible students with disabilities.

Among the six states that provided quantitative data separately for VR-eligible and potentially eligible students, the share of Pre-ETS that was authorized for potentially eligible students varies widely (Figure 2). In Alabama, Alaska, Missouri, and Washington, VR agencies provided a greater proportion of Pre-ETS to potentially eligible students with disabilities than VR-eligible students during the time period. In contrast, in North Carolina and Ohio, a greater proportion of Pre-ETS authorizations were for VR-eligible students relative to potentially eligible students. Because of the challenge presented by simultaneously providing new services and reaching this new population, these agencies waited until the school year to scale up delivery of Pre-ETS to potentially eligible students.

A challenge in serving potentially eligible students is that state VR agencies cannot provide some supporting services that could increase participation in Pre-ETS by these students. For example, the agencies cannot provide transportation services, which might be essential in connecting students to an employer. This restriction presents particular challenges in states with significant rural and remote populations. VR staff from the Texas VR agency said that to address this challenge, they would encourage potentially eligible students in need of additional supports to apply for VR services.

**Figure 2. Relative share of Pre-ETS authorizations to eligible and potentially eligible students with disabilities**



**Source:** Reports from six VR agencies that provided data on services authorized July 1, 2017, through September 30, 2017.

**BOX 1. Texas’s Summer Earn and Learn work-based learning experience**

During summer 2017, 1,500 students participated in paid work experiences; Texas plans to almost double that number in 2018. The program is a good example of scale and partnerships: VR agencies provided referrals, case management, and supporting goods and services, whereas local workforce boards handled all other aspects of implementing the program.

Almost all of the VR agency staff explained how the expansion of service delivery to a broader population requires collaboration with new and existing partners, including state Departments of Education, local school districts, and a range of community-based organizations. Agencies leverage these relationships in different ways. For example, some agencies have assigned a VR counselor to each school to coordinate Pre-ETS, assess needs, and attend Individualized Education Program meetings. Texas’s Summer Earn and Learn program relies on collaboration between VR agencies and local workforce boards (Box 1). Missouri’s Groundhog Job Shadow Month is a partnership between business specialists who know the local business context, Pre-ETS specialists hired by the state university system, and school districts, each providing essential supports for implementing this work-based learning experience.

**Requirement 2. Not replicating or replacing schools’ efforts**

WIOA also requires that agencies not replicate or replace transition services that schools already provide under IDEA. To help them meet this requirement, four of the ten agencies (Alabama, Alaska, West Virginia, and Texas) discussed the needs assessments or school-by-school plans they conducted. Alabama’s needs assessment process provides an illustrative example (Box 2). The Alabama Department of Rehabilitation Services (ADRS) uses the school-by-school action plans developed as part of its need assessment process to assess capacity and monitor delivery of Pre-ETS.

### Requirement 3. Report on Pre-ETS delivery in quarterly reports to RSA

#### **BOX 2.** **Alabama's needs assessment**

In collaboration with Auburn University's Transition Unlimited Program, ADRS asked schools to complete web-based surveys on Pre-ETS. At the start of the school year, schools reported "who, what, where, and when"—that is, the anticipated number of students, specific activities and programs planned in each of the five categories of Pre-ETS, location, and calendar dates. VR staff held 18 meetings across the state with representatives from over 300 school systems statewide to launch the effort, which will occur annually.

Beginning with the third quarter of federal fiscal year 2017, VR agencies were required to include Pre-ETS delivery in the reports they submitted to RSA. All agencies adapted or are in the process of adapting their case management or other data collection systems to include these required elements, although they varied in their approach to collecting this information.

Historically, case management systems for many agencies have documented services separately only when making individual authorizations (NCD 2017). As such, Pre-ETS and other services provided to students directly by counselors or by contracted providers would not be recorded as separate data elements in the 911 data reports to RSA. However, we did hear a few examples of agencies adapting their case management system to allow tracking of Pre-ETS delivery through counselors and contracted providers; we expect that practice to become more common as agencies grow their capacity to track data on Pre-ETS.

For example, one agency takes lists of participating students from contracted providers and uses this information to create new records for potentially eligible students or to update records for VR-eligible students. Missouri, for another example, demonstrates how an agency's capacity for collecting data on Pre-ETS evolved over the early implementation period (Box 3).

### Requirement 4. Reserve at least 15 percent of federal grant on Pre-ETS

Consistent with the NCD findings, some VR staff expressed concern that their agencies will not meet the 15 percent funding requirement, at least in initial years. Final interpretation of the WIOA regulations restricted agencies' ability to count the costs of many support services that agency staff believe are necessary for Pre-ETS delivery toward the 15 percent requirement. For example, costs for transporting students to and from work sites, food and uniforms for students participating in off-site Pre-ETS programs, and even some personnel costs associated with planning Pre-ETS cannot be counted as Pre-ETS expenditures when calculating funding proportions. We did not ask agency staff to report their spending on Pre-ETS, but the NCD report documented that among VR agencies with early reports

#### **BOX 3.** **Missouri's data collection system**

In Missouri, the new specialists hired by the state university system to deliver Pre-ETS initially tracked service provision via Excel spreadsheets and shared the spreadsheets with the VR agency. Beginning with the current school year, the university developed a data collection system that links directly to the VR agency's case management system. This approach eliminates the need for multiple recording mechanisms and the manual transfer of data from Excel to the VR data system.

of Pre-ETS spending in 2016, 33 percent of agencies spent no more than 5 percent of their federal grant in this area (NCD 2017). However, in our conversations with agency staff they described how they expect to meet the 15 percent requirement as they continue to bring Pre-ETS to scale.

## Who delivers Pre-ETS to students with disabilities?

VR agencies use both traditional and nontraditional methods to deliver Pre-ETS. Agencies have always relied on a range of direct and contracted service providers to deliver VR services, but delivery of Pre-ETS has required many VR agencies to look for even more innovative providers to help reach the broader population of potentially eligible students.

We grouped agencies' approaches to service delivery into three categories: (1) through new or existing *VR staff* such as counselors; (2) through new or existing *traditional contracted service providers*, such as community rehabilitation providers (CRPs), independent living centers (ILCs), and other community-based organizations; and (3) through new *nontraditional contracted service providers*, such as teachers (Figure 3). Nine of the ten agencies use a mix of these three approaches. An interesting aspect of the service delivery picture is that, in some state VR agencies, there is a perception that VR counselors would rather not be involved in delivering Pre-ETS because they prefer to focus on traditional VR counseling services. These agencies must therefore rely more heavily on contracted or other service providers.

**Figure 3. Approaches to delivering Pre-ETS**

VR staff and counselors	
<ul style="list-style-type: none"> <li>Alabama</li> <li>Missouri</li> </ul>	<ul style="list-style-type: none"> <li>North Carolina</li> <li>Ohio</li> </ul>
<ul style="list-style-type: none"> <li>Pennsylvania</li> <li>Texas</li> </ul>	<ul style="list-style-type: none"> <li>Washington</li> <li>West Virginia</li> </ul>
Traditional contracted service providers	
<b>Alabama</b>	CRPs through authorizations and other contracted providers
<b>North Carolina</b>	CRPs through fee-for-service and community agencies through contracts
<b>Ohio</b>	CRPs and community-based organizations such as ILCs
<b>Pennsylvania</b>	CRPs through authorizations and competitively-bid contracts to provide work-based learning experiences
<b>Texas</b>	CRPs, local workforce development boards, community colleges and universities
<b>Washington</b>	High schools, community colleges, ILCs, and CRPs
<b>West Virginia</b>	CRPs through fee-for-service, other contracted providers, and schools
Nontraditional contracted service providers	
<b>Alaska</b>	New teacher vendors deliver Pre-ETS as an after-school activity
<b>Missouri</b>	New specialists that are certified teachers hired through the state university system provide introductory services
<b>Pennsylvania</b>	New early reach coordinators who are trained social workers hired as commonwealth employees provide outreach in schools

**Source:** Interviews with staff or review of materials from 10 state VR agencies in Fall 2017.

**BOX 4.**  
**Alaska JOBZ club**

Alaska VR pays existing teachers to be VR vendors to provide Pre-ETS as afterschool activities for students with disabilities. Their current focus is on soft skills (communication, teamwork, attitudes, and professionalism), because the skills students learn in small villages differ from the work skills they need if they move to larger cities. VR provides teachers with a starter kit, supplies, and a seven-module curriculum adapted from the Office of Disability Employment Policy. The minimum number of students to form a club is five, with the average size being seven students. Teachers believe that the focus on soft skills is improving student functioning in school now, and they hope it will improve future employment as well.

Because of state-specific challenges and opportunities, some agencies have embraced innovative methods of delivering Pre-ETS to potentially eligible students, a population that is significantly larger than the number of students with disabilities VR is currently serving as VR-eligible. For example, many Alaskan schools are located in remote areas accessible only by plane or boat, and transportation costs for counselors or existing vendors to these areas are prohibitively expensive. In response to this issue, the VR agency allowed existing teachers throughout the state to serve as community rehabilitation providers known as “teacher vendors” to provide Pre-ETS as afterschool activities (Box 4).

Some agencies use different approaches for delivering services to VR-eligible students than to potentially eligible students because of providers’ existing relationships with and access to the different populations. In Ohio, VR-eligible students are authorized Pre-ETS both through the standard VR fee schedule and through service contracts. On the other hand, potentially eligible

students, who they began serving in October 2017, are served exclusively through contracts with ILCs and community-based organizations that specialize in individuals with specific disabilities (such as individuals who are deaf or who have mental health needs). In Washington, high schools, community colleges, and workforce development agencies are the main providers of Pre-ETS to potentially eligible students, and ILCs and CRPs mainly serve VR-eligible students.

Because Pre-ETS implementation is in its early stages, agencies are still developing their delivery methods. For instance, in Texas, VR counselors were initially the primary providers of Pre-ETS. Recently, however, the agency expanded the number of contracts to provide Pre-ETS to almost 50 providers statewide, including CRPs, local workforce development boards, and community colleges and universities.

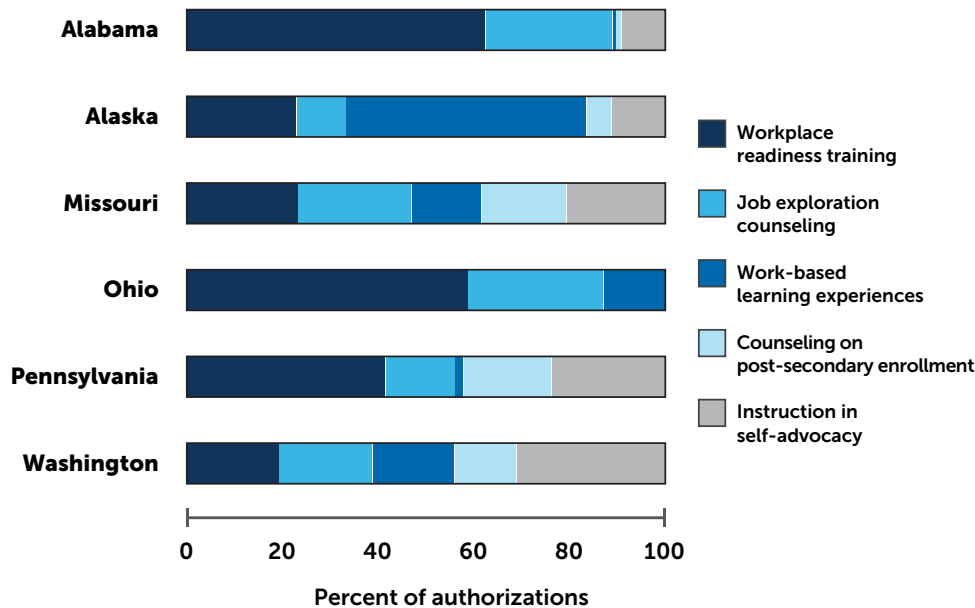
## Have agencies prioritized any of the Pre-ETS over others?

Most agencies delivered a subset of Pre-ETS rather than all of the services equally in the early implementation period. Using data from the six states that provided quantitative data on individual Pre-ETS delivery, we find that that agencies vary in the delivery of specific services, though the majority focus service delivery on direct work-related services (i.e., workplace readiness training, job exploration counseling, and work-based learning



experiences) (Figure 4). Missouri and Washington provided all five services relatively equally, while Alabama, Alaska, Ohio, and Pennsylvania provided a higher proportion of the direct work-related Pre-ETS.

**Figure 4. Relative share of individual Pre-ETS authorized for students with disabilities**



**Source:** Reports from four VR agencies on services authorized July 1, 2017, through September 30, 2017 (Alabama, Missouri, Ohio, and Washington) and two agencies on services authorized July 1, 2016, through June 30, 2017 (Alaska and Pennsylvania [PA DLI 2017]).

Several factors help explain the variation in the provision of individual Pre-ETS. Job exploration counseling and work readiness training were the most commonly provided services across most states, possibly because these services may be easier to provide to larger groups (for example, at schools) and, in many cases, they do not require collaboration with employers. Work-based learning experiences may be the most resource intensive of the five services. They do require collaboration with an employer, which is possibly why agencies provide work-based learning experiences less frequently at this early stage of Pre-ETS implementation. As the initial cohort of students ages into their later high school years, the proportion of work-based learning experiences may increase.

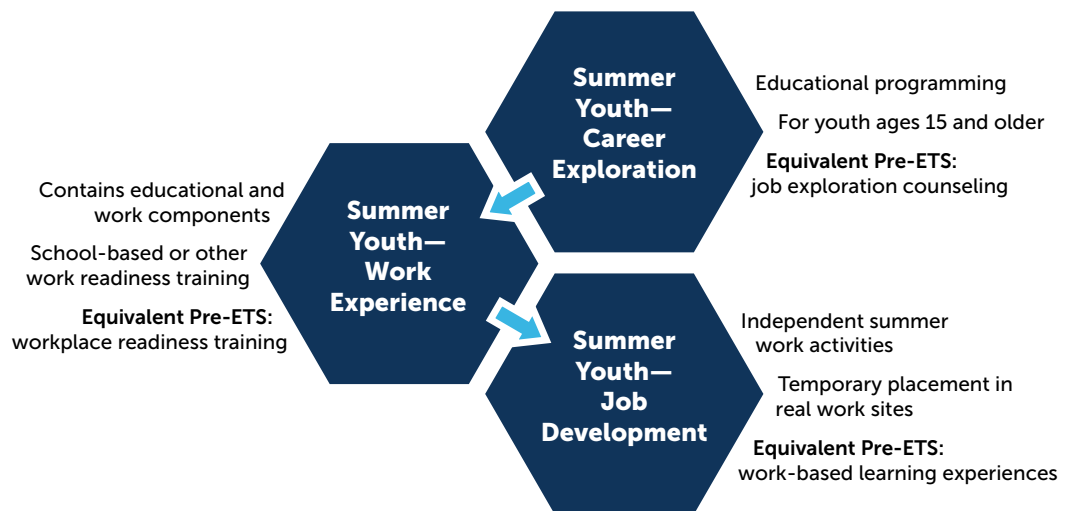
Agencies described prioritizing initial implementation of some Pre-ETS over others for several reasons. First, as we described in the previous section, many agencies relied on new or existing contracted providers to deliver at least some of their Pre-ETS to VR-eligible and potentially eligible students. The five Pre-ETS are relatively distinct, and many providers offer only one or two of the individual services (that is, they do not have the capacity to deliver all five). VR staff in Ohio described how ILCs currently prioritize instruction in self-advocacy because they have experience with that service; other community-based organizations that deliver all five Pre-ETS are continuing to do so for the new groups of students they serve.



Another reason for prioritizing services is that some agencies provide only certain Pre-ETS, or more robust services, for VR-eligible students and not for potentially eligible students. For example, in Pennsylvania, work-based learning experiences were initially available only to students who had already applied to VR because the support services necessary for those experiences require VR authorization, although they now allow potentially eligible students to also participate in work-based learning experiences. They also described how only VR-eligible students could participate in their summer academies, which provide students with opportunities to attend college classes and earn credits.

Finally, rather than deliver all five Pre-ETS to all students of all ages, three agencies (North Carolina, Ohio, and West Virginia) created Pre-ETS pathways, which reflect a sequence of services for students to follow as they progress through high school and develop maturity and experience. Figure 5 illustrates Ohio’s approach. Staff from multiple agencies said they believed work-based learning experiences were the most important Pre-ETS in terms of impact on students’ ability to get jobs, a belief that is also supported in the literature (for example, Carter, Austin, and Trainor 2012; Lindstrom, Kahn, and Lindsey 2013). Work-based learning experiences often represent the culmination of the Pre-ETS pathway, as is the case in Ohio. Many staff described how work-based learning experiences seem to be most appropriate for older students (age 16 and older), who need the patience and maturity to spend time in a workplace.

**Figure 5. Ohio’s progressive career development pathway**



**Source:** “Vocational Rehabilitation (VR) Transition Services,” Opportunities for Ohioans with Disabilities, procedure number 80-VR-11-12. Available at <https://education.ohio.gov/getattachment/Topics/Special-Education/Federal-and-State-Requirements/Secondary-Transition-and-Workforce-Development-for/Ohio-Transition-Support-Partnership/Transition-Specific-Services.pdf.aspx>. Accessed February 4, 2018.

## Conclusions

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In this brief, we provided new information that VR administrators may consider as they continue to roll out Pre-ETS delivery in their own states. The WIOA requirements represent a significant change for VR agencies, and agencies vary substantially in their approach to implementation, reaching the target population, and expanding service delivery in response to those requirements.

Using a sample of 10 state VR agencies, we found that some agencies immediately expanded to serve potentially eligible students with disabilities, whereas others began by focusing primarily on VR-eligible students. Agencies differed in the types of providers they use to implement Pre-ETS. They have relied on their tried and true approaches to service delivery by leveraging the skills of their existing providers and their relationships with schools and other community organizations, and they have also identified creative new ways to deliver Pre-ETS to the broader potentially eligible student population. Finally, agencies prioritized different combinations of the five Pre-ETS during initial implementation, although, perhaps not surprisingly, most states have strongly emphasized the delivery of direct work-related services.

As VR agencies continue to assess the demand for Pre-ETS within their respective states, they will most likely expand service delivery in the coming years. Our findings suggest that during this process, agencies can look to other agencies to help identify innovative approaches for extending their capacity to meet the need for Pre-ETS, with the ultimate goal of helping students with disabilities achieve their employment goals and obtain successful careers.

## Endnotes

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<sup>1</sup> See, for example, Carter, Austin, and Trainor 2012; and Lindstrom, Kahn, and Lindsey 2013.

<sup>2</sup> We spoke to staff at agencies in Alabama, New Jersey (general), North Carolina, Ohio, Pennsylvania, Texas, and Washington. For agencies in Alaska, Missouri (general), and West Virginia, we relied on information from conference presentations and webinars by agency staff (Bua-Iam et. al. 2017; NTACTION 2017).

<sup>3</sup> Quantitative findings are drawn from the data that agencies are now required to submit quarterly to the Rehabilitation Services Administration. For most agencies these data are limited to Pre-ETS authorizations (that is, services that are paid for by VR on a fee-for-service basis for each student) and do not include Pre-ETS provided directly by VR counselors or by contracted providers paid by capitation or umbrella contract. Data cover July 1, 2017, to September 30, 2017, except where otherwise noted. North Carolina did not provide counts for individual Pre-ETS, and Pennsylvania's report did not include separate counts for potentially eligible and VR-eligible students.

<sup>4</sup> A student with a disability is an individual with a disability in a secondary, postsecondary, or other recognized education program who: 1) is not younger than the earliest age for the provision of transition services under section 614(d)(1)(A)(i)(VIII) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)(1)(A)(i)(VIII)) unless the state elects a lower minimum age for receipt of pre-employment services and is not younger than that minimum age; and 2) is not older than 21; unless the individual state law provides for a higher maximum age for receipt of services under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.); and is not older than that maximum age; and 3) is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1411 et seq.); or 4) is an individual with a disability, for purposes of section 504 (WINTAC 2016).

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## About the Authors

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