

LRS CHAPTER 4, TECHNICAL ASSISTANCE & GUIDANCE MANUAL



Part	Name	Effective Date
412.15	Transition from School to Work	*November 23, 2020**

Authorization
Federal Register, Volume 81, Department of Education, 34 CFR 361, Part VI, State Vocational Rehabilitation Services Program, §361.48, §361.50, §361.52, §361.53 and 361.54.

I. DEFINITION OVERVIEW

- A. Transition services means a coordinated set of activities for a student with a disability designed within an outcome-oriented process that promotes movement from school to post-school activities, including post-secondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. The coordinated set of activities must be based on the individual's needs, taking into account preferences and interests, and must include 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. Transition services must promote or facilitate the achievement of the employment goal identified in the Vocational Rehabilitation (VR) Individualized Plan for Employment (IPE).
- B. An individual is considered to be a student with a disability for the purposes of Pre-Employment Transition Services if:
- the individual with a disability is in a secondary, postsecondary, or other recognized education program; and
 - has a disability documented on a signed IEP, a signed 504 accommodation plan/IAP, or other medical documentation of a disability signed by the appropriate medical professional; and
 - is at least 16 years of age, up to their 22nd birthday (based on transition age per IDEA in Louisiana).

A copy of the signed IEP, signed 504 accommodation plan/IAP, or other medical documentation of a disability signed by the appropriate medical professional must be obtained as documentation.

An individual may still be considered a student with a disability if they are taking part in a “gap year or semester”. The length of time or gap is not limited. In this instance the following two types of documentation are required:

- Documentation that the individual with a disability graduated from secondary education; and
- Documentation of acceptance into a post-secondary educational institution/programs.

- C. If the student turns 22 years of age during the school year (while in high school), they continue to be considered a student with a disability until they finish the academic year. Once a student exits from high school, they are no longer considered a student with a disability unless they enroll in post-secondary education. If enrolled in post-secondary education, they are considered a student with a disability until their 22nd birthday or their training ends, whichever occurs first.

Documentation that the student has been accepted in post-secondary education must be filed and documented in the case record prior to the start of Pre-Employment Transition Services. Once a student exits from a recognized education program, regardless of age, they are no longer considered a student with a disability.

II. ROLE OF THE COUNSELOR IN THE TRANSITION PROCESS FOR STUDENTS AND YOUTH WITH DISABILITIES

The Counselor will serve as an information resource for school system staff. In an effort to minimize delays from school to post-school activities, LRS' role in the transition planning process for transition aged youth focuses on:

- A. Consultation to Students and Families: General information is provided as early as possible regarding Pre-Employment Transition Services, as well as the VR program, general eligibility guidelines, and services. This may also include information on career exploration, work-based learning experiences, employment/training opportunities, workplace readiness training, self-advocacy and/or referral to other agencies. Consultation may be provided via the telephone, in person to a small group of students, or one-on-one with the student and/or family member(s).
- B. "Outreach" information should be made available to students, school personnel, and parents as early as possible during the transition planning process in order to enable students with disabilities to make an informed choice on Pre-Employment Transition Services and whether to apply for VR services while still in school.
- C. Technical Assistance to Schools: Specific information is provided regarding Pre-Employment Transition Services and various aspects of the vocational rehabilitation program as it applies to students with disabilities served within the secondary school setting. This information may be personally presented during in-service training or more formal presentations at the school, or local career fairs. Technical assistance may also be provided via the telephone, video conferencing or through written communication.

- D. Participation in Transition/IEP Meetings: Participation in transition meetings can provide Counselors with an avenue for outreach, consultation, and technical assistance, as well as for obtaining pertinent information from the school system that can be used for early identification of potentially eligible students with disabilities in need of Pre-Employment Transition Services and prospective applicants for vocational rehabilitation services. Counselors are expected to be involved in transition planning for individual students with disabilities as early as possible based on the needs of the student.
- E. LRS will attend IEP meetings when invited. The method of participation will be based on the Counselor's schedule, the needs expressed by the school district, and the student's individual needs. IDEA requires the consent of the parents or the student who has reached the age of majority under State Law to invite other agency representatives to participate in the meeting.
- F. Participation in the planning and coordination of services for transition students.
- G. Making Pre-Employment Transition Services available for all students with disabilities, as needed, and establishing eligibility for vocational rehabilitation services prior to exit from a secondary program if additional vocational rehabilitation services are required beyond the scope of Pre-Employment Transition Services.
- H. The Counselor or other designated LRS staff member participates in the development and implementation of local and regional interagency cooperative agreements. The cooperative agreements establish the framework within which interagency cooperation will occur.
- I. The Counselor or other designated LRS staff member participates as a member of local and regional core teams.

III. PRE-EMPLOYMENT TRANSITION SERVICES

Pre-Employment Transition Services (Pre-ETS) are coordinated activities for a student with a disability designed within an outcome-oriented process that promotes movement from school to post-school activities leading to competitive integrated employment. Counselors must make these services available to students with disabilities receiving services under an Individualized Education Plan (IEP) or is an individual with a disability for purposes of Section 504 of the Rehabilitation Act (IAP).

Pre-ETS includes five "required" activities that, in collaboration with local education agencies, VR shall make these services available for all potentially eligible and eligible students with disabilities. Services provided by VR enhance transition services but do not reduce the responsibility of local educational agencies under IDEA or Free Appropriate

Public Education (FAPE). Pre-ETS required activities can be provided by the Rehabilitation Counselor, a Community Rehabilitation Program (CRP), or by a Transition Specialist providing services to consumers through a Third-Party Cooperative Arrangement (TPCA) approved by LRS.

The Pre-ETS required activities provided by the Counselor must be entered in AWARE Actual Services by the Counselor to document that the services have been provided. Pre-ETS activities provided by a CRP is captured in AWARE through the authorization and invoice payment process. Pre-ETS activities provided by JAG and TPCAs will be entered in AWARE Actual Services by a Program Coordinator at State Office.

A. Pre-Employment Transition Services (Pre-ETS) required by WIOA include:

- Job Exploration Counseling
- Work-Based Learning Experiences
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Workplace Readiness Training to develop social skills and independent living skills
- Instruction in Self-Advocacy

1. Job Exploration Counseling:

This is defined as counseling, guidance, and training provided to students with disabilities designed to assist them in identifying and learning about job opportunities in particular occupations and industry sectors. These services may be provided in a classroom setting and/or one-on-one.

Examples of services provided under this component include, but are not limited to:

- Administration of vocational interest inventories
- Information about labor market composition
- Information on in-demand industry sectors and occupations
- Identification of career pathways of interest to students

2. Work-Based Learning Experience/Internships:

The Work-Based Learning Experience is the centerpiece of Pre-ETS services. This work-based experience is intended to assist students with disabilities in developing necessary skills and abilities to effectively place them into employment.

The Work Based Learning Experience/Internship should involve competitive, integrated employment to the maximum extent possible. An integrated setting is one found in the community, in which an individual with a disability interacts with employees and other persons, as appropriate to the position, who do not have disabilities to the same extent that employees without disabilities interact with these persons.

Examples of services provided under this component include, but are not limited to:

- Short term employment
- Paid internships
- Employer site visits
- Job shadowing

3. Counseling on Enrollment in Post-Secondary Education or other Comprehensive Transition Training Programs:

Assistance and support provided to students with disabilities regarding various opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education based on their goals and needs.

Examples of services provided under this component include but are not limited to:

- Information on course offerings and career options
- Types of academic and occupational training needed in the workplace
- Postsecondary opportunities associated with career field or pathways
- Advising students and parents or representatives on academic curricula
- Providing information about college application and admission processes
- Completing the free application for Federal Student Aid (FAFSA)
- Providing resources to support individual student success in education and training (i.e. Disability Support Services)

4. Workplace Readiness Training to develop social skills and independent living skills:

Workplace readiness training is provided to students with disabilities and is designed to assist them in preparing for employment through soft-skills training, job search training, and other related training.

Examples of services provided under this component include but are not limited to:

- Learning about work behaviors
- Work based social skills
- Asking for and receiving training and supervision
- Issues related to disclosure in the workplace
- Travel training

These services could be comprised of a classroom-based soft skills training program, web based work readiness training modules, training in the community or a combination of these three methods. These services should be curriculum based.

5. Self-Advocacy:

Services provided to students with disabilities to promote self-advocacy and leadership skills.

Examples of services provided under this component include but are not limited to:

- Learning about rights and responsibilities
- Learning how to request accommodations or services and supports
- Communicating thoughts, concerns and needs in order to prepare for peer mentoring opportunities with individuals working in an area of interest
- Mentoring opportunities with educational staff or with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings.

B. Pre-employment transition coordination activities are:

1. Working with local partners (including workforce development boards, one-stop centers, and employers) to develop work opportunities for students with disabilities, including internships, summer employment, employment opportunities throughout the year, and apprenticeships;
2. Working with schools to coordinate and ensure pre-employment transition services are provided;
3. Attending IEP meetings for student with disabilities, when invited; and
4. Attending person-centered planning meetings for individuals receiving Medicaid services if requested.

IV. ALLOWABLE PRE-ETS PURCHASES FOR A POTENTIALLY ELIGIBLE STUDENT WITH A DISABILITY:

- A. Any of the five required Pre-ETS activities, requested by the potentially eligible student with a disability, listed in III.A. above
- B. Auxiliary Aids and Services, as follows:
- Certified interpreter services on-site or through video remote interpreting services to ensure access to information when participating in job exploration counseling or other pre-employment transition services
 - Certified readers, taped text or audio recordings
 - Note takers, real-time computer aided transcription, written materials, exchange of written notes
 - Telephone handset amplifiers, assistive listening devices or systems, telephones compatible with hearing aids
 - Closed caption decoders, open & closed captioning, real time captioning
 - Voice text or video based telecommunications products and systems
 - Brailled materials and displays, screen reader software, magnification software
 - Screen reading software necessary to enable an individual who is blind to access information on a computer (not the computer on which it is installed)

NOTE: Refer to correlating TAG sections for instructions for purchasing the above.

V. ALLOWABLE PRE-ETS PURCHASES FOR AN ELIGIBLE STUDENT WITH A DISABILITY THAT REQUIRE AN IPE:

- Any of the five required Pre-ETS activities, requested by the eligible student with a disability, listed in III.A. above
- Auxiliary Aids and Services as listed in IV.B. above
- Assessment Services required to determine the VR needs of a student with a disability in order for them to fully benefit/engage in Pre-ETS activities (Except for assessment services to determine eligibility or priority of services)
- Rehabilitation Technology including Assistive Technology Devices
- Transportation Services must be provided in combination with a Pre-ETS activity in order for a student to take part in a Pre-ETS activity
- Personal Assistance Services (Personal Care Attendant) which must be provided in combination with a Pre-ETS activity, in order for a student to participate in a Pre-ETS activity (e.g. personal assistance services during a Work-Based Learning Experience)

- Rehabilitation Teaching & Orientation and Mobility Services required to benefit from Pre-Employment Transition Services
- Comprehensive Transition Programs, except for those that are degree seeking. If a consumer will no longer meet the definition of a student with a disability during the semester (ex., turns 22 years of age), the IPE and authorization should be documented as VR only.
- Books, tools, or training materials necessary to participate in one of the five required Pre-ETS activities in III.A. above at actual cost.
- Coaching services required to participate in a Work-Based Learning Experience (Refer to VII.D. below for rates).
- Salary reimbursement of a co-worker tasked to train a student with a disability on how to do job tasks at the employee's rate of pay up to \$500 per WBLE.
- Maintenance necessary to participate in Pre-Employment Transition Services including:
 - Uniform/clothing that are necessary for the participation in a required Pre-ETS activity at the actual cost up to \$100

To purchase the above listed items refer to correlating Chapter 4 guidance such as 412.04, 412.09, 412.10, 412.16, 412.20, 412.21, 412.23. For Coaching Services and Rehabilitation Teaching & Orientation and Mobility Services refer to the Purchasing Guidelines that follow in VII.E.

Any other services not listed in this section can be provided to eligible consumers per correlating Chapter 4 guidance using VR funds.

VI. PROCESS FOR SERVICE PROVISION

A. Potentially Eligible (PET) Case Type

The Workforce Innovation and Opportunity Act requires VR agencies to make Pre-Employment Transition Services available to all students with disabilities. Students with disabilities include individuals still enrolled in secondary education (high school) or post-secondary education who have a disability (receives services under an IEP, 504 plan/IAP, or has a documented disability that meets the definition of disability per Section 504) and are at least 16 years old but less than 22 years old.

Counselors will coordinate with each school district to ensure all individuals who meet the definition of a student with a disability and are in need of Pre-Employment Transition Services have access to these services, either directly from LRS staff and/or through a Community Rehabilitation Program.

1. Application

- a. An individual does not need to apply for VR services to receive Pre-Employment Transition Services if the individual meets the definition of student with a disability and is need of such services. The individual and/or representative, as applicable, needs to complete a Pre-ETS Information and Consent Release (Pre-ETS-1) for Pre-Employment Transition Services and assist in ensuring VR has the documentation described above to verify eligibility for Pre-ETS services.
- b. Provide the individual with a Client Assistance Program (CAP) brochure. Counselor must document in an AWARE case note that the student was provided with a CAP brochure.
- c. The Louisiana Voter Registration Application (LA-VRA) should also be offered and the Declaration Form completed. For students under the age of 18, the National Voter Registration Act views the parent or guardian as our “applicant” for services because they are the ones actually signing the application. Therefore, our offer to take/provide an application to register to vote should be made to the parent or guardian who is signing the document on behalf of the under-aged youth. If an under aged transition student is housed in a detention center, is a ward of the state, or does not have ready access to a parent or guardian, make a note on the declaration form that they are under age and that a parent or guardian was not available.

2. Verification of Disability

Verification of disability must be substantiated by documentation such as a copy of a signed IEP, a signed 504 accommodation plan (IAP), or other medical documentation of a disability signed by the appropriate medical professional. Assessments, evaluations, medical records, etc. cannot be authorized in PET case types.

The Counselor must verify disability by completing the AWARE Pages, Eligibility, Eligibility Determination page. Once this page is complete, generate a printed copy for approval by clicking on Reports, Eligibility Determination. The Counselor will sign the printed copy and forward to the Supervisor with the case record for approval.

3. Provision of Services

Once the student selects a vendor utilizing informed choice, services are authorized. Counselor must document in an AWARE case note how the student was provided with informed choice. Services must be authorized prior to the start of service provision.

4. If the Pre-ETS student becomes in need of individualized VR services and/or the individual is entering into the exit year and anticipates the need of VR services after exit from the school system, the counselor will initiate the VR application process.

5. Students receiving Pre-Employment Transition Services who receive SSI or SSDI should be referred to a benefits planner.

6. Closure

Once a student receives all needed Pre-Employment Transition Services or no longer meets the definition of a student with a disability, the Counselor must complete the closure page in AWARE. Once this page is complete the counselor will sign the printed copy and forward to the Supervisor with the case record for approval.

B. VR Case Type

If a student with a disability requires more than the five required Pre-Employment Transition Services and Auxiliary Aids & Services, the Counselor will initiate the VR application process, determine eligibility and place in the appropriate Order of Selection Category. If the student is placed in an Order of Selection category that is being currently served, the counselor can proceed with planning and developing an IPE.

If the student is already receiving Pre-ETS and is placed in an Order of Selection Category not currently being served, the student can continue to receive Pre-ETS. If Pre-ETS services have not begun Pre-ETS prior to their assignment to a closed OOS category, they may not receive Pre-ETS until their category is open. In addition, if a student is receiving Pre-ETS, applies for VR and is determined ineligible, then all services must cease because that student is no longer potentially eligible or eligible.

1. Referral Process for VR Services

- a. Referral to LRS does not automatically result in the individual's eligibility for vocational rehabilitation services. Although students with disabilities are entitled to FAPE, they must be determined eligible for vocational rehabilitation services through an individualized assessment process, and be placed in an Order of Selection group being served. A student determined potentially eligible for Pre-ETS services is not automatically eligible for VR services.
- b. Referral to LRS typically occurs one to two years before the student graduates or exits the secondary school system. In some instances, however, the student may be referred at an earlier time based upon the student's individual vocational rehabilitation needs.

2. Application

Generally, a student applies for vocational rehabilitation services in the year prior to the exit year. In some instances, applications may be accepted earlier in the transition process depending on individual vocational rehabilitation needs.

3. Eligibility

The counselor should utilize existing IEP/IAP information if available and if it reflects the present functioning status of the individual, even if the individual has exited the secondary program. Agency policy and guidance pertaining to both Eligibility and the Order of Selection must be followed.

4. Provision of Services

- a. For those students with an IEP or IAP, the Counselor should obtain a copy and consider appropriate/relevant elements of the IEP/IAP in developing the Individualized Plan for Employment (IPE).
- b. Development and approval of an IPE must be completed as early as possible during the transition process, but, at the latest, by the

time each student determined to be eligible for vocational rehabilitation services exits secondary training. The Counselor must coordinate services with education staff. If the student is placed in an Order of Selection Group not currently being served, an IPE should be written once services can be provided to the group.

- c. When selecting the vocational goal for a student with a disability on the IPE, it need only contain a description of the students projected post-secondary employment outcome/goal as opposed to a description of a specific employment outcome/goal.
- d. The Counselor must apply all LRS Policy/Procedure related to Order of Selection and Consumer Participation in the Cost of Services and Comparable Services/Similar Benefits.

C. School System Follow-up

The school system must perform follow-up on the progress of transition students. Therefore, Counselors should respond in a timely manner to requests from the school system for information on the progress of a student who was under an IEP. (Note: All policy and guidelines pertaining to confidentiality apply. The student must sign Consent to Release form [LRS-35]).

VII. PURCHASING GUIDELINES FOR PRE-EMPLOYMENT TRANSITION SERVICES

A. Paid Work-Based Learning Experiences (WBLE's)

The Counselor can reimburse student wages to an employer for Work-Based Learning Experiences. Employers must compensate students with wages that are at least the state's minimum wage and also must be consistent with wages paid to employees with the same or similar job titles.

Relatives of Pre-Employment Transition Services' participants will not be approved as a paid service provider unless such individuals are professionally and occupationally engaged in the delivery of such services by offering their services to the general public on a regular and consistent basis.

- 1. The rate of reimbursement is equal to the rate of pay plus 9.33% for social security, Medicare, and unemployment taxes. The employer may also be reimbursed wages for an employee teaching job tasks to the student at the employee's rate of pay, for the duration of the training, not to exceed \$500 per WBLE.

2. Reimbursement cannot exceed 240 hours per employer for a maximum of two (2) different employer placements (480 hours total per student). Reimbursement is made up to a forty (40) hour work week. Number of hours worked weekly should be jointly discussed and determined between the employer, Counselor and student as applicable.
3. Verification of the student's salary must be provided for reimbursement of Work-Based Learning Experiences. Acceptable methods of verification of the student's earnings may consist of one of the following:
 - a. Pay check stubs showing hours worked, gross income per month, week, all deductions including taxes, etc.

A copy of the Employer's payroll documentation showing the student's hours worked, gross income, deductions including taxes, etc. for the pay period.
4. Overtime is not reimbursed by LRS. A student can work overtime and receive payment from the employer; however, LRS will not reimburse the employer for overtime hours worked by the student.
5. The employer assumes all legal obligations for the student, including issuing wages earned, calculating and withholding payroll deductions, and providing unemployment insurance and worker's compensation coverage. The employer compensates student at a competitive wage and handles every aspect of the payroll administrative process from implementing timekeeping to delivery of paychecks.
6. Vendors will be paid for identifying a maximum of two (2) WBLE opportunities at a rate of \$500 each. ***
7. The Work Based Learning report (Form WBLE-1), along with verification documentation and an itemized invoice, must be completed and signed by the vendor and student and submitted to the Counselor or Program Coordinator.

8. Other WBLEs Services:

a. Job Shadowing

Job Shadowing is a one-on-one three to five-hour observation of a specific job and its duties at a business in the community. The job shadowing must be located at a business or organization not related/connected to the CRP's own agency. It also must not take place on the secondary education campus. The CRP must accompany the student to the site(s).

Rates: Maximum payment for each Job Shadowing is \$200 with a maximum of two (2) Job Shadow experiences at two different sites. The Job Shadowing report (Form Pre-ETS JS-1) must be completed and signed by the vendor, student, and the person who was job shadowed and submitted to the Counselor or Program Coordinator. Also, an itemized invoice must be submitted by the vendor.

b. Employer Site Visits

Vendors may arrange visits to a business or businesses with a group of two or more students to allow them to tour the business, get information on how to apply, etc. The Employer Site Visit(s) must be located at a business or organization not related/connected to the CRP's own agency. It also must not take place on the secondary education campus. The Employer Site Visit report (Form Pre-ETS ESV) must be completed and signed by the vendor, student and a company representative and submitted to the Counselor or Program Coordinator.

Rates: Maximum payment for each student for each Employer Site Visit is \$75, with a maximum of two Employer Site Visits at two different sites. An itemized invoice must be submitted by the vendor.

B. Pre-Employment Transition Services (Excluding WBLEs)

The student's attendance and progress will be documented on the Pre-ETS Attendance and Progress Report form (Pre-ETS-WR). This form must be completed and signed by the student and the vendor and submitted along with an itemized invoice to the Counselor or Program Coordinator.

Rates: A maximum amount of 64 sessions can be provided at the rate of \$50 per session not to exceed \$3,200 per student. A session is comprised of 45 – 90 minutes of instructional time. Only one service can be provided per session. The maximum amount of sessions per service is as follows:

- Job Exploration Counseling - 5 sessions
- Self-Advocacy - 10 sessions
- Counseling on Enrollment in Post-Secondary Education or other Comprehensive Transition Program - 5 sessions
- Workplace Readiness Training - 44 sessions

C. Assistive Technology Devices/Support Services/Uniforms

Employers, CRPs and consumers may be reimbursed rates allowed per applicable parts of this TAG manual for services listed under IV and V when required in order for the consumer to participate in or benefit from a required Pre-ETS activity.

Invoices should be itemized and detail the costs being requested for reimbursement. Pay check stubs must be submitted with the invoice for reimbursement of wages.

D. Coaching Services

Coaching services can be provided when needed by a student with a disability to participate in Work-Based Learning Experiences at a rate of \$25.00 per hour for up to the 240 hours allowable for a maximum of 2 WBLEs. The Counselor should determine the number of hours needed per WBLE and document in AWARE. The CRP must provide one-on-one coaching services at the location of the WBLE. Form Pre-ETS CS must be completed and signed by the vendor and student and submitted to the Counselor.

E. Rehabilitation Teaching & Orientation and Mobility Services

1. Rehabilitation Teaching can be provided to train on software, hardware or use of devices at a rate of \$40 per hour and \$25 per hour for instructor's travel time.
2. Orientation & Mobility - This individualized training is provided to orient the student in order to participate in a Pre-ETS required service at a rate of \$65 per hour for instruction time and \$25 per hour for the instructor's travel time.

- F. The Counselor must complete the IPE. Submit to the District Supervisor for approval unless Counselor is on Independent Status. Upon approval the RCA/Counselor will enter the Authorization(s). See Chapter 4, Part 411.1 for further instructions on Secondary Approval requirements.
- G. If the total of all items/services on any IPE is equal to or greater than \$25,000, it shall be considered “high cost.” In these instances, all Counselors must have the IPE approved by both the District Supervisor and the Regional Manager.
- H. The employer must complete an IRS W-9 form, if the employer is not an approved LRS vendor. The Counselor must submit the IRS W-9 to the District Supervisor. The employer must invoice the Counselor. The employer’s invoice is used to process payment to the employer.