NTACT THE COLLABORATIVE

The Exciting World of Quality Assurance

Pre-Employment Transition Services

NTACT:C Training and Technical Assistance | December 14, 2023

Presenters

Brenda Simmons M.S.
Senior Technical Assistance and
Research Analyst
National Technical Assistance Center on
Transition: The Collaborative (NTACT:C)
The George Washington University
Email: bksimmons@gwu.edu

Sandra Miller M.S.
Senior Technical Assistance and
Research Analyst
National Technical Assistance Center on
Transition: The Collaborative (NTACT:C)
The George Washington University
Email: sjmiller11@gwu.edu

NTACT THE COLLABORATIVE

This content was developed by the NTACT:C, a project funded under #H326E200003, of the U.S. Department of Education (Department). The information contained herein does not necessarily reflect the position or policies of the Department, and no official endorsement of any non-Federal product, service, or venture should be inferred.

Learning Objectives

Understand the importance of including Pre-ETS in the quality assurance (QA) case file review.

Learn how the FFY24 Monitoring and Technical Assistance Guide (MTAG) can be used to develop questions specific to Pre-ETS to include in a QA case file review.

Increase knowledge of strategies for utilizing QA case file review results to improve program performance.

Increased understanding of strategies for how to successfully implement change priorities.

WIOA Regulations - Scope of VR Services

The scope of vocational rehabilitation services for individuals with disabilities includes:

361.48(a): Pre-employment transition services

361.48(b): Services for individuals who have applied for or been determined eligible for vocational rehabilitation services in accordance with an approved IPE

Continuum of VR Services

Pre-ETS Services

- earliest set of services for **potentially eligible or eligible swd**
- short term in nature to help identify career interests
- specific set of five required activities provided directly to swd under Pre-ETS
- States must reserve a minimum of 15% of federal funds to provide Pre-ETS services

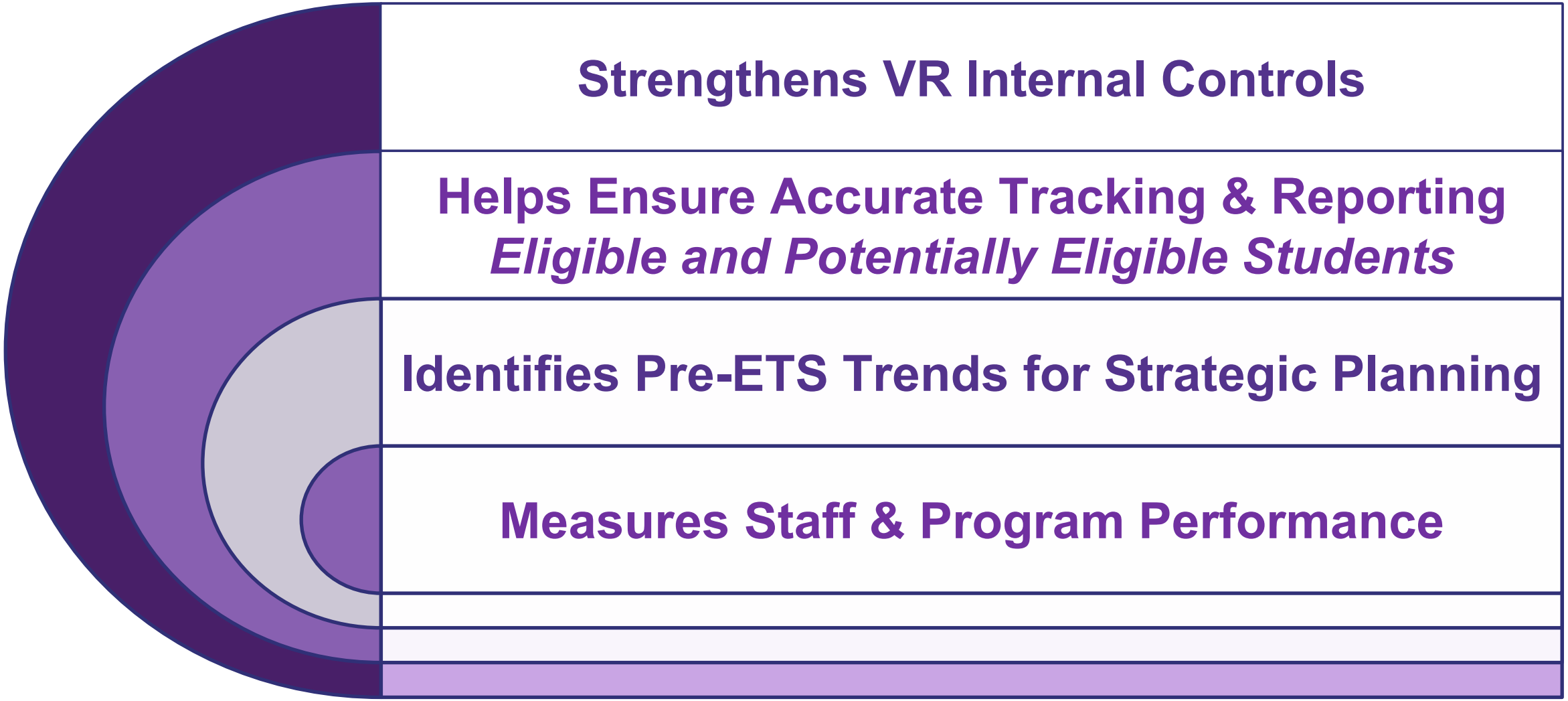
Transition Services

- available for **eligible swd or ywd through an IPE**
- help further develop and pursue career interests through post-secondary ed, vocational training, job search, job placement, job retention, job follow-up and job follow-along services

Employment Related

- typically provided once eligible swd or ywd have further identified, developed and pursued career interests, offered through transition services, and are pursuing specific employment outcomes through an IPE
- assist in preparing for, securing, retaining, advancing in or regaining an employment outcome

Inclusion of Pre-ETS in the Case File Review Process

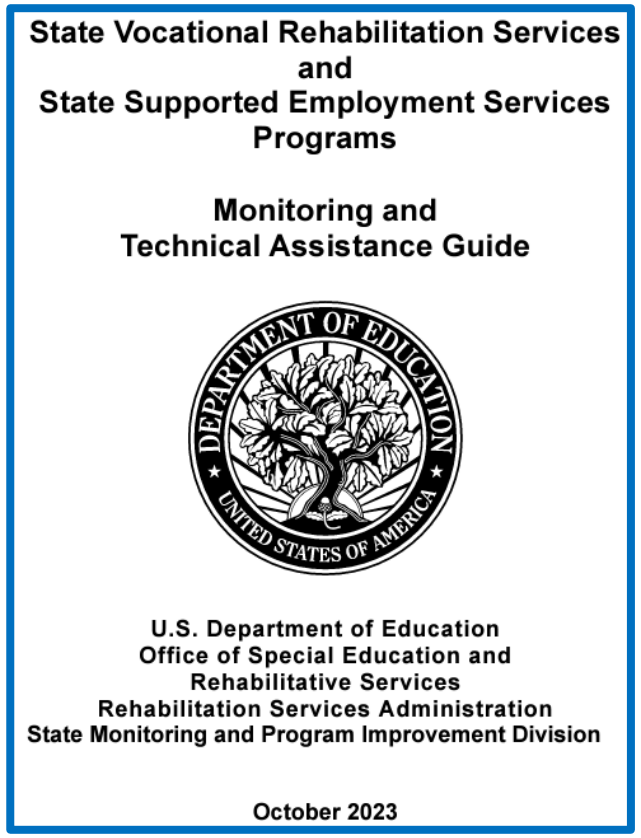


Why Talk About This Now?

- ✓ Almost 10 years since WIOA was passed and evidence suggests that employment rates for youth have only incrementally improved following WIOA implementation (Smith et al., 2021).
- ✓ State VR Agencies have a better understanding of the intent of Pre-ETS and are in a better position to evaluate the effectiveness of service delivery and implementation.
- ✓ Highest percentage of VR recipients and participants are youth and swd - their success is the future of the VR program.
- ✓ State VR Agencies are still challenged - we are not spending the money!

NTACT THE COLLABORATIVE

FFY 2024 Monitoring and Technical Assistance Guide (MTAG)


State Vocational Rehabilitation Services
and
State Supported Employment Services
Programs

Monitoring and
Technical Assistance Guide

U.S. Department of Education
Office of Special Education and
Rehabilitative Services
Rehabilitation Services Administration
State Monitoring and Program Improvement Division

October 2023

Setting the Stage – The Backstory

Pre-Employment Transition Services

- VR agencies report RSA-911 data related to the provision of pre-employment transition services for students with disabilities, including potentially eligible students **and** those determined eligible for the VR program.

- **The RSA monitoring review team will analyze data on:**
  - the number of students with disabilities
  - the number of those receiving pre-employment transition services, and
  - the types of services provided

Peeking Behind the Curtain

RSA Monitoring Team will look at information regarding:

- ✓ *the **breakout of students with disabilities who received pre -employment transitions services as potentially eligible** students with disabilities and students with disabilities who received these services under an IPE*
- ✓ *the **number of students with disabilities who advance from potentially eligible** status to VR program participant status and their outcomes*
- ✓ *the relationship between the provision of pre-employment transition services, participation in the VR process, and employment outcomes (**the VR Continuum**)*
- ✓ **the use of funds** *for the provision of pre-employment transition services and whether the agency is meeting the required reservation and expenditure of at least 15 percent of its Federal VR grant funds*

NTACT THE COLLABORATIVE

MTAG 2024 – Nine Pre-ETS Questions (1)

38. Does the VR agency have updated and accurate policies and procedures to implement pre-employment transition service requirements, including the provision of services to students with disabilities who are potentially eligible for VR services?

39. How does the VR agency ensure accurate documentation, tracking, and reporting of preemployment transition services provided to students with disabilities? How are VR staff tracking and documenting time spent providing required pre-employment transition services or coordination activities for students with disabilities? Is the agency providing authorized activities?

MTAG 2024 – Nine Pre-ETS Questions (2)

40. For agencies that are not meeting or exceeding the reservation and expenditure of 15 percent of Title I VR funds for arranging and providing pre-employment transition services to students with disabilities, what are the reasons or explanations provided by the agency for not meeting this requirement? What strategies are being implemented to meet the requirement?

41. Of those receiving one or more pre-employment transition services, what percentage of students with disabilities are potentially eligible and what percentage are applicants for the VR program? How many students with disabilities are exiting pre-employment transition services without applying for further VR services? What strategies is the VR agency using to attract, engage, and encourage potentially eligible students with disabilities to consider applying for the VR program?

MTAG 2024 – Nine Pre-ETS Questions (3)

42. Of reported students with disabilities who are not receiving pre-employment transition services, what strategies is the VR agency using to increase the number of reported students receiving pre-employment transition services?

43. If the number of students with disabilities receiving pre-employment transition services is increasing, what is preventing the VR agency from meeting the reserve requirement?

44. How are pre-employment transition services provided and what challenges exist? Are there differences in the service modalities, level, or availability of pre-employment transition services in different parts of the State (e.g., unavailable CRPs in rural areas of the State, level of local educational agency coordination or cooperation)? What strategies is the VR agency employing to address any deficits?

MTAG 2024 – Nine Pre-ETS Questions (4)

45. For students with IPEs who receive pre-employment transition services as well as VR services necessary to support their participation in pre-employment transition services, what VR services are these students with disabilities receiving that may be charged to the reserved funds?

46. How does the VR agency engage with partners and education programs to collaboratively provide pre-employment transition services, including planning activities, joint activities, and coordination activities such as Individualized Education Program (IEP) meetings? What challenges, if any, is the VR agency experiencing in collaborating with education programs and other partners to provide pre-employment transition coordination activities?

How Do We Evaluate the Effectiveness of Pre-ETS?

RSA 911 Reporting, Data Dashboards, and Surveys

QA Case File Reviews

NTACT THE COLLABORATIVE

MTAG – Pre-ETS Quality Assurance (QA) Crosswalk

FFY24 MTAG Pre-ETS Q

Pre-ETS Case File Review Q

NTACT THE COLLABORATIVE

MTAG/Pre-ETS QA Crosswalk – A Reference Guide for Pre-ETS Case File Reviews

MTAG FFY24	Pre-ETS QA Case File Sample Questions	Y/N N/A	Evidence of Documentation	Link to Agency Policies/Procedures	Related VR Staff Training

Pre-ETS Policies (1)

MTAG 2024	Pre-ETS QA Questions
38. Does the VR agency have updated and accurate policies and procedures to implement pre-employment transition service requirements, including the provision of services to students with disabilities who are potentially eligible for VR services?	1. Is there documentation of the student's referral for Pre-ETS? If yes, did VR staff follow procedures consistent with the agency's policies and procedures? 2. Is there evidence of parental consent if the student is under the age of majority? 3. Is there evidence VR staff had a discussion with the student describing the five required Pre-ETS? 4. Is there evidence VR staff had a discussion with the student about the option to apply for VR services?

Pre-ETS Policies (2)

MTAG 2024	Pre-ETS QA Questions
38. Does the VR agency have updated and accurate policies and procedures to implement pre-employment transition service requirements, including the provision of services to students with disabilities who are potentially eligible for VR services?	5. Did VR staff document the **student's need** for Pre-ETS? If yes, is there evidence need was determined by: a. Discussion with the student b. Review of school records/talk with teachers c. Other (must specify) 6. Did VR staff document the **student's agreement** with Pre-ETS prior to the start of services? If yes, is there evidence of how agreement was obtained? 7. Is there evidence **VR staff** reviewed and approved the Pre-ETS provided prior to the start of services? If yes, how is this documented in the case file?

Pre-ETS Policies (3)

MTAG 2024	Pre-ETS QA Questions
38. Does the VR agency have updated and accurate policies and procedures to implement pre-employment transition service requirements, including the provision of services to students with disabilities who are potentially eligible for VR services?	8. Is there evidence of discussion with the student regarding their need for auxiliary aids and services? If needed, were they provided in accordance with agency policies and procedures for potentially eligible or eligible students, as applicable? 9. Is there evidence of discussion with the student regarding additional VR services that might be needed to participate in Pre-ETS? a. If the individual was potentially eligible, were they advised to apply for VR services in order to receive these additional VR services? b. If the individual had already been determined eligible, is there evidence that those additional VR services were provided in accordance with an approved IPE, consistent with the agency's policies and procedures?

Pre-ETS Policies (4)

MTAG 2024	Pre-ETS QA Questions
38. Does the VR agency have updated and accurate policies and procedures to implement pre-employment transition service requirements, including the provision of services to students with disabilities who are potentially eligible for VR services?	10. Did VR staff document how each of the required Pre-ETS were going to be delivered to the student, consistent with agency policies and procedures (e.g. individually, in a group setting, by the VR staff directly, through a purchased service, etc.)? 11. For purchased services, is there evidence in the case file of student progress and/or outcomes that were achieved (e.g. report from a provider, case note from the counselor, etc.)? 12. If the individual is currently enrolled in secondary education, is there evidence that Pre-ETS were provided in coordination with the local education agency (LEA), consistent with the agency's policies and procedures? If yes, how is this documented in the case file?

Is this all making sense?

Pre-ETS Documentation, Tracking, Reporting (1)

MTAG 2024	Pre-ETS QA Questions
39. How does the VR agency ensure accurate documentation, tracking, and reporting of preemployment transition services provided to students with disabilities?	13. Does the referral include all needed RSA 911 reporting requirements? If no, how was this information obtained for reporting purposes? 1. a unique identifier 2. social security number (if available) 3. date of birth 4. race 5. ethnicity 6. student's disability 7. start date of pre-employment transition services 8. the pre-employment transition services provided, including the type of provider and amount expended for the service

Pre-ETS Documentation, Tracking, Reporting (2)

MTAG 2024	Pre-ETS QA Questions
39. How does the VR agency ensure accurate documentation, tracking, and reporting of preemployment transition services provided to students with disabilities?	14. Is there evidence VR staff verified the individual met the definition of a student with a disability? 15. Is there evidence VR staff accurately documented the required elements in the case record consistent with policy and procedures to ensure the service is reported and the start date of Pre-ETS is accurate? 16. If the individual has exited secondary education and is planning on attending a postsecondary education program, did VR staff obtain required documentation to verify they are enrolled in a recognized post-secondary education program?

Pre-ETS Documentation, Tracking, Reporting (3)

MTAG 2024	Pre-ETS QA Questions
39. How does the VR agency ensure accurate documentation, tracking, and reporting of preemployment transition services provided to students with disabilities?	17. If the student received auxiliary aids and services, were they coded appropriately in the CMS system? a. For potentially eligible students, were services coded as one of the five required Pre-ETS? b. For eligible students, were services coded as an auxiliary aid or service that is needed for the student to access Pre-ETS? 18. If an eligible student received **other VR services** in order to access or participate in one of the five required Pre-ETS, were each of those services accurately tracked and reported in the CMS system to ensure costs were appropriately charged to the reserve funds?

Pre-ETS Documentation, Tracking, Reporting (4)

MTAG 2024	Pre-ETS QA Questions
39. How does the VR agency ensure accurate documentation, tracking, and reporting of preemployment transition services provided to students with disabilities?	19. If Pre-ETS was provided directly by VR staff, is there documentation of the receipt of that service (e.g. case note, pre-post survey, etc.)? If yes, is it documented in accordance with the agency's Pre-ETS policies and procedures? 20. If Pre-ETS was provided through a purchased service, is there documentation of the receipt of that service (e.g. report with invoice)? If yes, is it documented in accordance with the agency's Pre-ETS Policies and procedures? 21. Does the case record reflect information documenting the student's progress and/or performance for each of the required Pre-ETS services received? If yes, is there evidence this information was used for further vocational planning?

Pre-ETS Expenditures

MTAG 2024

40. For agencies that are not meeting or exceeding the reservation and expenditure of 15 percent of Title I VR funds for arranging and providing pre-employment transition services to students with disabilities, what are the reasons or explanations provided by the agency for not meeting this requirement? What strategies are being implemented to meet the requirement?

Pre-ETS QA Questions

22. Is there evidence that all expenditures for Pre-ETS activities and certain other VR services needed by a student with a disability to access or benefit from Pre-ETS are appropriately charged to the federal funds reserved for the provision of Pre-ETS?

23. Is there evidence of strategies implemented by VR staff and/or Pre-ETS providers to ensure students with disabilities remain engaged in Pre-ETS?

Pre-ETS Within the VR Continuum of Services

MTAG 2024

41. Of those receiving one or more pre-employment transition services, what percentage of students with disabilities are potentially eligible and what percentage are applicants for the VR program? How many students with disabilities are exiting pre-employment transition services without applying for further VR services? What strategies is the VR agency using to attract, engage, and encourage potentially eligible students with disabilities to consider applying for the VR program?

Pre-ETS QA Questions

24. Is there evidence in the case record that documents VR staff are having periodic discussions with potentially eligible students about:
    - Pre-ETS and other VR services the student may need or benefit from?
    - the opportunity to make an informed decision about whether or not to apply for VR?
25. For a potentially eligible student, is there evidence in the case record that indicates the student elected or chose not to apply for the VR program? If yes, what documentation supports the student no longer needs VR services?

Pre-ETS Student Engagement

MTAG 2024	Pre-ETS QA Questions
42. Of reported students with disabilities who are not receiving pre-employment transition services, what strategies is the VR agency using to increase the number of reported students receiving pre-employment transition services?	26. If the case record reflects the individual is being reported as a student with a disability, but they are not receiving any of the five required Pre-ETS services, is there supporting documentation regarding: • Attempts to connect or engage with the student? • Why they are not receiving a Pre-ETS service? • How they are actively engaged in the receipt of other VR services? • Any other strategies for engagement by VR staff with the student?

Pre-ETS 15% Reserve

MTAG 2024	Pre-ETS QA Questions
43. If the number of students with disabilities receiving pre-employment transition services is increasing, what is preventing the VR agency from meeting the reserve requirement?	**** Information collected from the case file review might reflect agency trends that will be important to consider in order to ensure that all staff time and effort for Pre-ETS is being tracked in accordance with agency policy and procedures, maximizing the use of Federal funds that can be allocated to the reserve.***

Pre-ETS Service Provision

MTAG 2024	Pre-ETS QA Questions
44. How are pre-employment transition services provided and what challenges exist? Are there differences in the service modalities, level, or availability of pre-employment transition services in different parts of the State (e.g., unavailable CRPs in rural areas of the State, level of local educational agency coordination or cooperation)? What strategies is the VR agency employing to address any deficits?	***Information collected from the case file review might reflect agency trends regarding current service delivery that will be important to consider in order to identify challenges/barriers/gaps that exist with regard to effective practices and successful implementation of Pre-ETS.***

Pre-ETS and Other VR Services

MTAG 2024	Pre-ETS QA Questions
45. For students with IPEs who receive pre-employment transition services as well as VR services necessary to support their participation in pre-employment transition services, what VR services are these students with disabilities receiving that may be charged to the reserved funds?	27. For eligible students with disabilities in accordance with an IPE, is there evidence regarding how/why the additional VR services identified on the IPE are necessary in order for the student to benefit from or participate in the five required Pre-ETS and are charged to the reserved funds?

Pre-ETS Collaboration with Education (1)

MTAG 2024	Pre-ETS QA Questions
46. How does the VR agency engage with partners and education programs to collaboratively provide pre-employment transition services, including planning activities, joint activities, and coordination activities such as Individualized Education Program (IEP) meetings? What challenges, if any, is the VR agency experiencing in collaborating with education programs and other partners to provide pre-employment transition coordination activities?	28. For students who are in HS and receiving special education services, is there evidence in the case record that identifies what transition services the student has received under IDEA from the education agency? Is there supporting documentation verifying services were not duplicated? 29. Is there evidence that VR staff participated in the student's IEP meeting, when invited? 30. Is there evidence that services outlined in the IPE were aligned with goals/objectives and/or accommodations outlined in the IEP/504 plans? Is there a copy of the IEP/504 plan? 31. Is there evidence in the case record that VR shared a copy of the student's IPE with the school to encourage coordination of transition planning and services?

Pre-ETS Collaboration with Education (2)

MTAG 2024

46. How does the VR agency engage with partners and education programs to collaboratively provide pre-employment transition services, including planning activities, joint activities, and coordination activities such as Individualized Education Program (IEP) meetings? What challenges, if any, is the VR agency experiencing in collaborating with education programs and other partners to provide pre-employment transition coordination activities?

Pre-ETS QA Questions

32. For eligible students with disabilities, did the VR counselor develop an IPE as early as possible during the transition planning process and not later than the time the student left the school setting? If no, does the case record provide adequate justification as to why not?

33. For eligible students with IPEs, is there evidence that the VR counselor developed an IPE with the student that is more general in nature and includes a description of the student's projected post-school employment outcome, as opposed to a specific employment outcome? If yes, is there evidence of the following:

    a. The VR counselor subsequently refined the IPE, through the amendment process, to include a specific employment goal and the VR services necessary to achieve that goal?

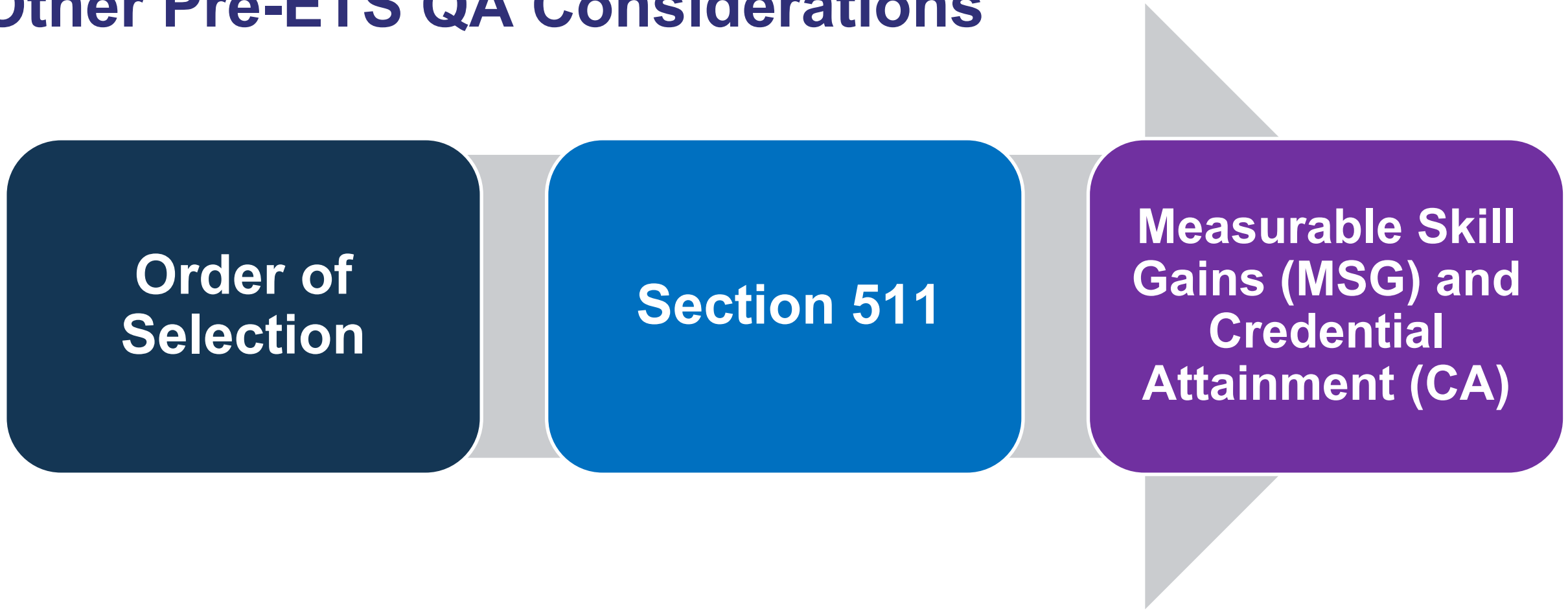
MTAG 2024: Services and Service Delivery – One Pre-ETS Related Q

Resources: Appendix B and Appendix C

- Table 1—VR Agency Profile
- Table 4—VR Service Provision
- Table 5—Measurable Skill Gains and Credentials
- Table 7—Students with Disabilities
- Table 8—Pre-Employment Transition Service Provision

Q26. Does the VR agency contract with or refer individuals to centers for independent living in the State for pre-employment transition services or VR services that assist individuals to obtain competitive integrated employment? If not, why not?

Other Pre-ETS QA Considerations



While documentation of staff time providing Pre-ETS services is not a case file review issue, the agency should consider how they are going to review this information, and what internal controls need to be in place to ensure that all staff time and effort for Pre-ETS is being tracked in accordance with agency policy and procedure, and is maximizing the funds that can be allocated to the reserve.

Have State Agencies Embedded Pre-ETS Into the QA Process?

Do you have a way to measure student progress and engagement in Pre-ETS activities?

Do you celebrate success and identify any challenges/barriers to be mindful of?

Do VR Transition Services Need Separate Questions from Pre-ETS?

Celebrate Successes

Resources

- Policy Guide for VR Transition Services
- VR Continuum of Services
- Policy Guide for Pre-ETS
- Time Allocation Guide for Pre-Employment Transition Services
- Pre-Employment Transition Services: Set Aside Determination Guide

#transitionTA transitionTA.org ntact-collab@uncc.edu

NTACT THE COLLABORATIVE

The contents of this webinar were developed under a grant funded by Cooperative Agreement #H326E20003 (NTACT: C) from the Department of Education. However, these contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.