

## **ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

**Program Name:** Vocational Rehabilitation (VR)

**Policy Number:** VR-11.2-v1

**Effective Date:** July 1, 2008

**Last Revision:** March 31, 2021

**CHAPTER 11:** Employment (Job Readiness) Services

**Section 11.1:** Pre-employment Transition Services (Pre-ETS)

### **I. Policy Statement**

This policy provides the guidelines regarding the provision of pre-employment transition services (Pre-ETS) which are intended to provide potentially eligible students with disabilities with an early start at job exploration.

### **II. Authority**

Authority for policies contained in this document includes the following:

- Workforce Innovation and Opportunity Act (WIOA), 29 U.S.C. § 3101 et seq.
- Title IV Amendments to the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq.
- State Vocational Rehabilitation Services Program, 34 C.F.R. §§:
  - Scope of vocational rehabilitation services for individuals with disabilities 361.48 (a)(1-4)
  - Participation of individuals in cost of services based on financial need 361.54 (b)(1-2)
- A.R.S. §§ 23-502 and 503

### **III. Applicability**

This applies to circumstances when a student with a disability pursues Pre-ETS services from VR. The student must:

- A. Explore and utilize transition services through the Public Educational Agency (PEA), if available.
- B. Submit an VR Pre-Employment Transition Services Request Form.
- C. Submit one of the following documents to identify the student's disability in instances when the above form is signed by non-school/non-VR personnel:
  1. Individual Educational Plan (IEP) or documentation or 504 accommodations provided by the PEA.,

2. Proof of receipt of SSI/SSDI based on client's own disability,
3. Medical or psychological documentation with diagnosis signed by a licensed professional verifying the diagnosis.

#### **IV. Standards**

- A. VR must make Pre-ETS available statewide to all students with a disability between the ages of 14-22. Refer to Appendix 1 Glossary of this policy manual for details about "Student with Disability."
- B. VR must coordinate the provision of Pre-ETS with PEAs.
- C. Economic need does not apply.
- D. Comparable benefits apply.
- E. The VR Counselor must assist recipients of Pre-ETS with identifying career interests which may be further explored through additional VR services, including transition service.
- F. VR must provide the following Pre-ETS services to potentially eligible students with disabilities in the areas of:
  1. Job Exploration Counseling,
  2. Work-Based Learning Experiences,
  3. Counseling on Post-Secondary Education,
  4. Workplace Readiness Skills Training, and
  5. Instruction in Self-Advocacy.
- G. Pre-ETS may not be provided under the following circumstances when the student:
  1. Completed Pre-ETS services listed in IV. F above and chose not to apply for VR and their record of service was closed,
  2. Applied for VR and was determined eligible and placed on a waitlist prior to the receipt of any Pre-ETS service,
  3. Applied for VR and was determined ineligible, or
  4. Is no longer in need of Pre-Employment Transition Services in order to access competitive and integrated employment.
- H. Upon receipt of a student's Pre-Employment Transition Request form, the VR Counselor must review and determine whether the student has any of the following:
  1. A disability,

2. Been determined as a potentially eligible student with a disability,
  3. Completed and submitted the agency Referral Form,
  4. An open VR case that has been determined eligible for VR services in an open OOS Priority Category, or
  5. An open VR case that has been determined eligible for VR services in a closed OOS Priority Category but has been placed on the waitlist for VR services.
- I. All Pre-Employment Transition Request form referral information must include the following to be entered in the ECF:
    1. Student Name,
    2. Date of Birth,
    3. Social Security Number (a pseudo SSN must be requested if actual SSN is not available),
    4. Race,
    5. Ethnicity, and
    6. Identification of the student's disability or involvement in an IEP or 504 plan.
  - J. In instances when the potentially eligible student started receiving Pre-ETS prior to being placed in a closed Order of Selection (OOS) Priority Category wait list, the student must continue receiving Pre-ETS until service completion.
  - K. In instances when the Pre-ETS Request Form is the only source of documentation used to verify disability, the form must be signed by school staff and the student or the student's representative if applicable.
  - L. The VR Counselor and the student with disability and their representative if applicable, must agree upon the Pre- Employment Transition Services that are appropriate and necessary.
  - M. The decision about appropriate and necessary Pre-ETS services must meet the student's needs, based on the student's unique strengths, abilities, capabilities, interests, and informed choice.
  - N. Pre-ETS services must be provided as pre-planned services for a student who does not have an Individualized Plan for Employment (IPE) and as planned service for those who have an IPE.
  - O. VR must provide auxiliary aids or services in the event this service is necessary for a student to participate in Pre-ETS.
  - P. Other public entities are not required to provide auxiliary aids or services for the purpose of the student's participation in Pre-ETS.

- Q. VR must provide a recipient of Pre-ETS with notification of the appeal rights in the following circumstances:
  - 1. When the agreed upon Pre-ETS is made available,
  - 2. Upon any disagreement during the receipt of Pre-ETS, and
  - 3. Upon completion of Pre-ETS.
- R. VR must send the agency Pre-ETS Completion letter with Appeal Rights form to a recipient of Pre-ETS in the following situations:
  - 1. All agreed upon Pre-ETS are complete and the student declines to apply for further VR services,
  - 2. The recipient declines to participate in further Pre-ETS services, and
  - 3. The recipient no longer meets the definition of a student with a disability.
- S. In instances when a student wishes to apply for VR services other than Pre-ETS, the VR Application Form must be completed in order for the student's eligibility to be determined as per Section 3.2 of this policy manual.
- T. Pre-ETS contracted providers may conduct outreach to identify potentially eligible students with disabilities who are interested in receiving Pre-ETS services.
- U. The VR Counselor must refer any existing VR client who is also a student with disability to the available Pre-ETS provider(s).

**V. Procedure**

- A. Refer to IV. B, E, H, I-J, N-O, R-S, and U above.
- B. Refer to Standard Work, if available.
- C. Refer to the RSA Allowable Services Spreadsheet, contracts, and provider requirements.
- D. The VR Counselor must complete the agency Referral for Services form when referring a VR client who is also a student with disability for Pre-ETS services.
- E. The VR Counselor must task the Purchasing Technician to create RSA Purchase Authorization(s) for the service(s) listed in V. D.
- F. The Purchasing Technician must submit the RSA Purchase Authorization for each service listed in V. D along with the referral information to the provider(s).
- G. Upon receipt of the provider's progress report, the VR Counselor must review the report for completeness, approve the provider's invoice and process for payment after confirming that the reporting documentation is complete.

- H. VR must track Pre-ETS provided by VR personnel via personnel's calendars and allocated as Pre-ETS work time on the timecard.
- I. VR must track Pre-ETS provided by contracted vendors through authorizations and payment in the case management system.
- J. The VR Counselor must scan all documentation supporting the student's disability in the Electronic Case File (ECF).

**VI. Documentation Requirements**

The client's electronic case file must include the following:

- A. Documentation supporting the student's disability,
- B. Pre-ETS Completion letter with Appeal Rights, if applicable,
- C. RSA Purchase Authorization(s), if applicable, and
- D. Provider reports.