

## **ARIZONA DEPARTMENT OF ECONOMIC SECURITY**

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

**Policy Number:** VR-11.1-v3

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**Last Revision:** October 25, 2024

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

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

### **I. Policy Statement**

This policy provides the guidelines for the provision of pre-employment transition services (Pre-ETS).

### **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 CFR §§:
  - 361.48 (a)(1-4), Scope of vocational rehabilitation services for individuals with disabilities, and
  - 361.54 (b)(1-2), Participation of individuals in cost of services based on financial need.
- Arizona Revised Statutes:
  - § 23-502, and
  - § 23-503.

### **III. Applicability**

This policy applies to students with a disability, ages 14 to 22, who request Pre-ETS from VR.

### **IV. Standards**

- A. Pre-ETS are short-term services designed to help students with disabilities transition from school to employment or postsecondary education. Pre-ETS are the earliest set of services that VR can offer to any student with a disability, who is eligible or potentially eligible for Vocational Rehabilitation (VR), regardless of whether the student has applied or been determined eligible for VR.

- B. All students with a disability, as outlined in IV.C., are considered potentially eligible for VR, regardless of whether the student has applied or has been determined eligible for VR.
- C. A student with a disability is an individual who:
  - 1. Has a documented disability and is:
    - a) Eligible for and receiving special education or related services under Part B of the Individuals with Disabilities Education Act, or
    - b) An individual with a disability, for purposes of section 504 of the Rehabilitation Act, as amended by the WIOA.
  - 2. Is between the ages of 14 to 22, and
  - 3. Is enrolled in a recognized education program (e.g. high school (private, public, or charter), home school, college, GED program, or vocational program).
- D. Economic need does not apply to Pre-ETS.
- E. Comparable benefits apply to Pre-ETS.
- F. Pre-ETS consists of the following activities:
  - 1. Self-Advocacy Skills: Assists students in developing knowledge about disability disclosure on the job, how to improve self-advocacy skills, and how to ask for help/accommodations at work.
  - 2. Workplace Readiness Training: Assists students in developing social skills and independent living, such as communication and interpersonal skills, financial literacy, orientation and mobility skills, job-seeking skills, understanding employer expectations for punctuality and performance, and other "soft" skills necessary for employment.
  - 3. Job Exploration: Assists students in learning about industry, occupation, and labor market information to help them identify a career path,
  - 4. Post-Secondary Education/Training Counseling: Assists students in learning how to complete a federal student aid application, and to explore scholarship and post-secondary education opportunities, and
  - 5. Work-based Learning Experiences: Assists students by providing real-life work experiences to help students connect school experiences to real-life work experiences that can be paid or unpaid. VR and VR contracted Pre-ETS providers coordinate the provision of Pre-ETS with Public Education Agencies (PEAs).
- G. A student with a disability, or their legal guardian, who is interested in Pre-ETS must:

1. Submit the VR Pre-Employment Transition Services Request form to a VR Counselor, contracted VR provider, or school personnel.
  2. Submit one of the following documents to confirm the student's disability in instances when the VR Pre-Employment Transition Services Request form is not signed by a school or VR personnel:
    - a. Individual Educational Plan (IEP), documentation, or 504 accommodations provided by the PEA,
    - b. Proof of receipt of SSI/SSDI based on the client's own disability, or
    - c. Medical or psychological documentation with a diagnosis, signed by a licensed professional verifying the diagnosis.
- H. Pre-ETS may not be provided under the following circumstances when the student with disability:
1. Applied for VR and was determined eligible and placed on an Order of Selection before the receipt of any Pre-ETS, or
  2. Applied for VR and was determined ineligible.
- I. If applicable, the VR Counselor may assist recipients of Pre-ETS with identifying career interests that may be further explored through additional VR services, including transition services.
- J. The VR Counselor must complete the Pre-Employment Transition Services Case Information form in the case management system for all students requesting Pre-ETS.
- K. In instances when a student with a disability wishes to apply for VR services other than Pre-ETS, the VR Application Form must be completed for the student's eligibility to be determined, as per Section 3.2 of this policy manual.
- L. Pre-ETS contracted providers may conduct outreach to identify potentially eligible students with disabilities who are interested in receiving Pre-ETS.
- M. If there are any disagreements about the receipt of Pre-ETS, VR must provide the student with disability a notification of their appeal rights.
- N. VR must send a Pre-ETS Completion Letter with Appeal Rights to a Pre-ETS recipient when:
1. All agreed-upon Pre-ETS are completed and the recipient is to apply for further VR services,
  2. The recipient declines to participate in further Pre-ETS, or
  3. The recipient no longer meets the definition of a student with a disability.
- O. **Pre-Employment Transition Services Request Form:**

1. Upon receipt of a student's Pre-Employment Transition Services Request form, the VR Counselor must review and determine whether the student has:
  - a) A disability,
  - b) Been determined as a potentially eligible student with a disability,
  - c) Completed and submitted the agency Referral Form,
  - d) An open VR case that has been determined eligible for VR services in an open Order of Selection (OOS) Priority Category, or
  - e) An open VR case has been determined eligible for VR services and is in a closed OOS Priority Category.
2. All Pre-Employment Transition Services Request forms entered into the electronic case file (ECF) must include the following referral information:
  - a) Student Name,
  - b) Date of Birth,
  - c) Social Security Number (a pseudo-SSN must be requested if the actual SSN is not available),
  - d) Race,
  - e) Ethnicity, and
  - f) Identification of the student's disability or involvement in an IEP or 504 plan.
3. In instances when the Pre-Employment Transition Services 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 legal guardian (if applicable).

**P. Pre-ETS under Order of Selection (OOS):** In instances when the potentially eligible student started receiving Pre-ETS before being placed in a closed OOS Priority Category, the student must continue receiving Pre-ETS until service completion.

**Q. Students with a VR Individualized Plan for Employment (IPE):**

1. The VR Counselor, the student with a disability, and the student's legal guardian (if applicable) must agree upon the Pre-ETS that are appropriate and necessary.
2. The decision about appropriate and necessary Pre-ETS must meet the student's needs, based on the student's unique strengths, abilities, capabilities, interests, and informed choice.

3. Pre-ETS must be provided as pre-planned service(s) for a student who does not have an Individualized Plan for Employment (IPE) and provided as planned service(s) for those who have an IPE.
4. VR clients who are students with a disability can receive Pre-ETS from their VR Counselor or be referred to the available Pre-ETS provider(s) to receive services, if applicable.

**R. Auxiliary Aids or Services Necessary to Support Pre-ETS:**

1. VR must provide auxiliary aids or services in the event this service is necessary for a student to participate in Pre-ETS.
2. Other public entities are not required to provide auxiliary aids or services for the student's participation in Pre-ETS.

**V. Procedure**

- A. Refer to IV. J, K, and O-V above.
- B. Refer to Standard Work, if available.
- C. Refer to the RSA Allowable Services Document, Pre-ETS contract, and Section 16.1: Service Provider Requirements.
- D. The VR Counselor must complete the agency Pre-Employment Transition Services Request form when referring an existing VR client who is also a student with a disability for Pre-ETSS.
- E. For potentially eligible students with disabilities, the VR Counselor must:
  1. Review the Pre-Employment Transition Services Request form submitted by the contracted provider,
  2. Return the request form to the contracted provider to approve the requested Pre-ETS services, and
  3. Scan the completed request form into the ECF.
- F. The VR Counselor must task the Purchasing Specialist to create RSA Purchase Authorization(s) for the service(s) listed on the Pre-Employment Transition Services Request form.
- G. The Purchasing Specialist must submit the RSA Purchase Authorization for each service listed on the Pre-Employment Transition Services Request form, along with the referral information, to the provider(s).
- H. 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.

- I. VR staff must track all Pre-ETS provided for potentially eligible students with disabilities and eligible VR clients who qualify for Pre-ETS on their Employee Time Entry (ETE) form.
- J. VR must track Pre-ETS provided by contracted vendors through authorizations and payment in the case management system.
- K. The VR Counselor must scan all documentation confirming the student's disability in the ECF.

**VI. Documentation Requirements**

- A. The client's ECF must include the following:
  - 1. Documentation confirming the student's disability,
  - 2. Pre-Employment Transition Services Request form,
  - 3. Pre-ETS Completion Letter with Appeal Rights, if applicable,
  - 4. Pre-Employment Transition Services Case Information form,
  - 5. RSA Purchase Authorization(s), if applicable, and
  - 6. Provider reports.