

Joint Guidance for Limitations on Use of Subminimum Wage Section 511 of the Workforce Innovation and Opportunity Act

Introduction

This guidance, intended for Rehabilitation Services Administration (RSA) Vocational Rehabilitation (VR), Public Education Agencies (PEAs), 14(c) Certificate Holders, Division of Developmental Disabilities (DDD), as well as other professionals working with individuals affected by these regulations, reflects Arizona's priorities, including:

- The expectation that youth and adults with disabilities should have opportunities to pursue competitive integrated employment, and employment must be considered in every individualized plan;
- Individualized planning is key to effective services and supports and should ensure a balance of what is important to and for a person; and
- Services should take place in the most integrated setting appropriate to meet the needs of individuals with disabilities, and be appropriate to the individual's identified goals and outcomes.

Section 511 of the federal Workforce Innovation and Opportunity Act of 2014 (WIOA), which took effect July 22, 2016, placed new responsibilities on the RSA/VR, 14(c) Certificate Holders, PEAs, DDD, and persons with disabilities engaged in or seeking subminimum wage employment. These new responsibilities require youth with disabilities to complete several required activities that promote the consideration of competitive integrated employment¹ before a youth can enter employment that pays less than the federal minimum wage. The new responsibilities also require that any individual, *currently* in subminimum wage employment, be provided with career counseling and information/referral services throughout the duration of their employment to ensure knowledge of employment options and supports in their community.

Arizona RSA/VR, 14(c) Certificate Holders, PEAs, and Arizona Health Care Cost Containment System (AHCCCS) including DDD, understand that each of their systems play a role in providing supports and services that empower youth and adults with disabilities to choose and succeed in competitive integrated employment. The above agencies as well as additional partners outlined below, see the importance of collaboration. Together, these agencies and partners took part in creating this Joint Guidance Document to assure we are consistently working together to effectively and efficiently support those affected by these regulations.

¹ Competitive and Integrated means work that is performed on a full-time or part-time basis (including self-employment) for which an individual:

- Is compensated at a rate that is at or above the federal or state minimum wage for the place of employment but not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience and skills;
- In the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experiences and skills;
- Is eligible for the level of benefits provided to other employees;

Competitive and Integrated means work that is performed at a location:

- That is typically found in the community and
- Where the employee interacts for the purpose of performing work duties of the position with other employees within the particular work unit and the entire work site, and, as appropriate to the work performed, other persons (e.g. customers and vendors) who are not individuals with disabilities (not including supervisory personnel or service providers) to the same extent that employees who do not have disabilities and who are in comparable positions interact with these persons, and;
- That presents, as appropriate, opportunities for advancement that are similar to those for other employees who are not individuals with disabilities who have similar positions.

Involved Parties Affected by WIOA Section 511

RSA: Oversees several programs which are designed to assist eligible individuals who have disabilities to achieve employment outcomes and enhanced independence by offering comprehensive services and supports. The RSA's VR program provides services and supports in order to assist persons with disabilities to meet their employment goals.

14(c) Certificate Holders: Employers/providers who hold certificates issued under Section 14(c) of the Fair Labor Standards Act that authorize the payment of subminimum wages (wages that are less than Federal minimum wage or the State minimum wage, whichever is higher) to workers who have documented disabilities that impair their productivity for the work being performed.

PEA: As defined by the ARS §15-761 (26) means a school district, a charter school, an accommodation school, a state supported institution or any other political subdivision of this state that is responsible for providing education to children with disabilities.

DDD: Supports the choices of individuals with developmental disabilities and their families by providing supports and services in their home and integrated community settings that are tailored to meet the individual member's needs. Individuals must meet DDD eligibility and Arizona Long Term Care eligibility in order to obtain services.

Persons with Disabilities: Person(s) with a physical or mental impairment that results in a substantial barrier to employment. The person(s) with a disability that is affected by the WIOA/Section 511 is a youth 24 years of age or younger seeking, or a person of any age who is already engaged in, any type of employment that pays subminimum wage. Typically, these employment settings are called Centered Based Employment and/or in some cases Group Supported Employment.

AHCCCS: Arizona's Medicaid agency providing healthcare coverage to qualified Arizona residents. Individuals must meet certain income and other requirements to obtain services. AHCCCS provides physical health, behavioral health and Long-Term Care services through Managed Care Organizations (MCOs).

Arizona Employment First: A grassroots effort that is working across stakeholders and systems to facilitate necessary changes to encompass the belief that, with the right supports and services in place, competitive integrated employment is the preferred daily activity for all working age Arizonians who have disabilities.

Payment of Subminimum Wage to Youth ages 24 and Younger

Within Section 511 there is a particular focus on youth 24 and younger. These youth must complete several required activities prior to entering subminimum wage employment with a 14(c) Certificate Holder.

Required activities are as follows:

1. The youth must complete Pre-employment Transition Services as defined by WIOA which authorizes the RSA/VR program, and/or Transition services as defined by the Individuals with Disabilities Education Act (IDEA) which authorizes special education programming.

- Pre-employment Transition Services are specific services meant to provide students with disabilities with an early start at job exploration. Pre-employment Transition Services are provided through the RSA/VR program and include:
 - Job exploration counseling
 - Work-based learning experiences
 - Counseling on postsecondary educational programs at institutions of higher education

- Workplace readiness training to develop social skills and independent living
 - Instruction in self-advocacy, which may include peer mentoring
- Transition Services are a coordinated set of activities focused on improving the academic and functional achievement of a student with a disability, in order to facilitate the student's movement from school to post-school activities specific to the student's identified measurable post-secondary goals. Transition services are based on the individual student's needs, taking into account the student's strengths, preferences, and interests. Transition Services are provided through the PEA and include the appropriate areas below that will reasonably enable the student to meet the measurable post-secondary goals:
 - Instruction
 - Related services
 - Community experiences
 - The development of employment and other post-school living objectives; and
 - Acquisition of daily living skills and provision of functional vocational evaluation.

2. The youth must apply for RSA/VR services and be determined ineligible, or have their case closed without achieving an employment outcome. Closure without achieving an employment outcome means that the youth has been determined eligible for RSA/VR services, has received services per the Individualized Plan for Employment, has been working toward an employment outcome (with supports and services) for a reasonable period of time² without success, and the individual's RSA/VR case is closed.

3. The youth must receive career counseling, and information and referrals to public programs and other locally available resources that offer employment-related services and supports designed to attain competitive integrated employment. These services may not include work compensated at subminimum wage, or result in employment at subminimum wage. Career Counseling and Information and Referral services are provided through the RSA/VR program.

Payment of Subminimum Wage to Individuals of All Ages

For individuals who were employed at subminimum wage before July 22, 2016, regardless of age, the 14(c) Certificate Holder must maintain documentation that the individual has received career counseling and information and referral services from RSA/VR at required intervals throughout the duration of subminimum wage employment. All individuals employed at subminimum wage prior to July 22, 2016 must have received the requisite first annual career counseling and information and referral services no later than July 22, 2017, and annually thereafter. Individuals who entered subminimum wage employment on or after July 22, 2016 must receive career counseling every six months during the first year of employment and annually thereafter.

14(c) Certificate Holder must provide information about local self-advocacy, self-determination, and peer mentoring training opportunities available in the community. These training opportunities may not be provided by the certificate holder. If the 14(c) certificate holder employs less than 15 employees and is considered a small business, they may request that RSA/VR provide the required information in addition to the career counseling and information and referral services.

² Reasonable period of time must take into account the disability-related and vocational needs of the individual, as well as the anticipated length of time required to complete the services identified in the individualized plan for employment to achieve an employment outcome.

RSA/VR will coordinate with 14(c) Certificate Holders and individuals earning subminimum wage to ensure individuals who are paid subminimum wage have access to the required career counseling and information and referral services, designed to promote opportunities for competitive integrated employment.

Home and Community Based Service Rules:

On January 16, 2014, the Centers for Medicare and Medicaid Services (CMS) released a final rule regarding requirements for home and community based services (HCBS) operated under section 1915 of the Social Security Act. The rules establish requirements for both residential and non-residential settings, including center-based employment and group supported employment settings. The purpose of the rule is to ensure that individuals receiving HCBS are integrated into their communities and have full access to the benefits of community living. The rule does not address services that are provided in a member's home such as attendant care, personal care, homemaker and habilitation services.

AHCCCS has submitted an assessment of Arizona's current status, and a transition plan to meet HCBS compliance rules. The transition plan for center-based employment includes remediation strategies to ensure individuals receiving services are working in a setting and sharing an employment experience to the same extent as individuals not receiving Medicaid funded long-term care services. More information on Arizona's plan to comply with the HCBS Rules may be found on at www.azahcccs.gov/hcbs.

Unlike the HCBS Rules, it is important to note that Section 511 does not pertain to services or settings, rather to wages paid and is separate and distinct from the State's efforts to comply with the HCBS Rules. That said, the two initiatives are aligned and part of a larger effort by the Federal Government to support individuals with disabilities to live, work and receive services in the most integrated setting.

Part 1 Table: Youth Seeking Subminimum Wage Employment

IMPACT OF 511

PEA

Section 511 of WIOA prohibits schools to contract or have other arrangements with holders of special wage certificates/14(c) in order to pay a youth with a disability subminimum wage. Section 511 does not prohibit a PEA from contracting with an entity that holds a special wage certificate if the youth are paid at or above the minimum wage or if the purpose is for something other than to work at subminimum wage, such as assessments and transition services.

WIOA does not change any requirements for PEAs in the provision of transition services required under IDEA; however, WIOA does require PEAs to collaborate with VR to accomplish several objectives. One of these collaboration efforts requires PEAs to share the documentation under Section 511 with VR in a format that is consistent with the confidentiality requirements of the Family Educational Rights and Privacy Act (20 U.S.C. 1232g(b) and 34 CFR 99.30 and 99.31) and the Individuals with Disabilities Education Act (20 U.S.C. 1417(c) and 34CFR 300.622).

DDD

WIOA Section 511 requirements affect DDD members who are employed in subminimum wage jobs and members who are 24 years of age or younger and seek employment paying subminimum wage.

DDD members receive Employment Services through a network of contracted Qualified Vendors, many of whom hold 14 (c) Certificates which allow the payment of subminimum wages to members based on productivity. DDD Vendors with 14 (c) Certificates must comply with the new WIOA requirements.

DDD Members who were employed prior to July 22, 2016 in Center Based or Group Supported Employment at a subminimum wage must be provided career counseling and information and referral services by July 22, 2017, and annually thereafter.

As of July 22, 2016, DDD members 24 years of age and younger must meet specific WIOA requirements before a DDD Vendor can employ them in Center Based or Group Supported Employment paid at a subminimum wage.

Additionally, DDD members 24 years of age and younger employed at a subminimum wage after July 22, 2016, must be provided career counseling and information and referral services every six months for the first year, then annually thereafter.

AHCCCS

WIOA Section 511 impacts any AHCCCS member considering receiving sub-minimum wage or currently employed at sub-minimum wage.

MCOs (Managed Care Organization) may contract with employment service providers that hold 14[c] certificates, allowing individuals receiving services to earn sub-minimum wage, and these providers must adhere to the new WIOA standards. This section pertains to guidance specific to AHCCCS members receiving services from a Behavioral Health MCO or Long Term Care MCO. For the purposes of this section, a Long Term Care MCO provides services to individuals who are aging and/or have physical disabilities. The majority of AHCCCS members impacted by WIOA Section 511 are individuals served by DDD therefore, please reference the DDD specific guidance elsewhere in this document.

RSA/VR

As of July 22, 2016, RSA/VR is responsible to provide documentation of the completion of all required activities to youth ages 24 and younger who are seeking subminimum wage employment with a 14(c) Certificate Holder.

RSA/VR will experience an increase in referrals for youth with significant disabilities who are interested in entering subminimum wage employment with a 14(c) Certificate Holder.

14(c) Certificate Holder

As of July 22, 2016, 14(c) Certificate Holders may employ youth who are 24 and younger if they are paid minimum wage.

14(c) Certificate Holders may not employ youth who are 24 and younger in subminimum wage employment without verifying documentation of the youth's completion of required activities.

Youth 24 and Younger

As of July 22, 2016, youth who are 24 and younger must obtain documentation of the completion of required activities from RSA/VR prior to being eligible to enter subminimum wage employment with a 14(c) Certificate Holder.

RESPONSIBILITIES UNDER 511

PEA

Consistent with guidance from the Office of Special Education Programs (OSEP) (Letter to Pugh) IEP progress reports for transition-aged students must address the student's progress toward meeting his or her postsecondary goals and must include documentation of the transition services provided to the student during the progress reporting period.

PEAs are responsible for ensuring that their personnel does not contract with 14(c) providers for the purpose of sub-minimum wage employment.

PEAs must also collaborate with VR in order to comply with the requirements of Section 511 by; 1) upon receipt of a records request from VR, transmitting the requested documentation to VR within 30 calendar days; 2) when responding to the request for release of records the PEA must complete and include a cover sheet that itemizes the documentation transmitted to VR (VR has developed and will provide the cover sheet as an option for PEAs to use.); and 3) retaining a copy of all documentation provided to VR in a manner consistent with the requirements of 2CFR 200.333 and Arizona State Library, Archives and Public Records General Records Retention Schedule GS 1018.

If a parent (or a student who is the age of majority) revokes consent for special education or related services during high school, the PEA is responsible for providing documentation of that decision (e.g. Prior Written Notice) to VR within 5 calendar days.

DDD

DDD Qualified Vendors are responsible for complying with the requirements of the federal Labor Laws and may not employ a DDD member 24 years of age or younger unless the requirements of WIOA Section 511 have been met. The DDD member shall provide the Vendor all the required documentation received from RSA/VR. The Vendor must maintain copies of the required documentation.

When a DDD member 24 years of age or younger requests employment at a sub-minimum wage, the member's Support Coordinator shall complete the DDD/VR referral form and forward it to the DDD Employment Specialist with all required documents. The Employment Specialist shall forward the RSA/VR Referral Packet for review to RSA/VR in order to complete WIOA Section 511 determination and all required activities and, if appropriate, receipt of RSA/VR documentation.

AHCCCS

Providers contracted by Behavioral Health or ALTCS MCOs must be familiar with WIOA Section 511, educate members on the new processes and services and know how and where to direct members who are either currently receiving sub-minimum wage or are planning on receiving sub-minimum wage.

RSA/VR

RSA/VR Staff will process all referrals for youth interested in entering subminimum wage employment with a 14(c) Certificate Holder and use the prescribed agency templates to document the completion or refusal of required activities.

Documentation will be provided to the youth or youth's representative within 45 days of completion of the required activities.

If, through informed choice, the youth or youth's representative refuses to participate in the required activities, they will be ineligible for subminimum wage employment with a 14(c) Certificate Holder. RSA/VR staff must provide documentation of refusal to the youth within 10 days.

14(c) Certificate Holders

14(c) Certificate Holders must review, verify and maintain copies of documentation provided by RSA/VR indicating that the youth has completed the required activities before the youth may begin work at subminimum wage.

The Wage & Hour Division of the US Department of Labor is responsible for the administration and enforcement of the provisions that limit the ability of 14(c) Certificate Holders to pay a subminimum wage to workers with disabilities.

Youth 24 and Younger

Youth referred to RSA/VR due to their interest in entering subminimum wage employment are responsible to inform RSA/VR staff of their intent to enter subminimum wage employment.

Youth or youth's representative is responsible for maintaining documentation provided by RSA/VR of the completion of required activities.

Youth or youth's representative is responsible for providing all documentation provided by RSA/VR to the 14(c) Certificate Holder when attempting to enter subminimum wage employment.

WHEN TO REFER YOUTH TO RSA/VR

PEA

PEAs should make a referral to VR in accordance with 34 C.F.R. §300.107, Nonacademic Services (Authority: 20 U.S.C. 1412(a)(1)).

Although IDEA requires the development of an employment measurable postsecondary goal, it does not require PEAs to identify the work environment. If at any point it becomes evident that subminimum wage employment will be pursued, it is recommended to refer the student to VR for program eligibility. It would be appropriate to refer the student to VR prior to student exit even if the student's age is beyond the minimum age (14) in which the VR program accepts referrals.

DDD

DDD members 24 years of age or younger expressing an interest in Center Based or Group Supported Employment at subminimum wage must be referred to RSA/VR.

DDD members may be referred to RSA/VR as young as age 14 or as early as possible in the Transition Planning process.

DDD Members interested in competitive employment in the community should be referred to RSA/VR.

AHCCCS

If a member 24 years and younger is interested in employment with a sub-minimum wage, a referral to RSA Vocational Rehabilitation (VR) should occur immediately. If a member 25 years and older is interested in employment with a sub-minimum wage, no referral to VR is necessary per WIOA Section 511, however it is always appropriate to refer to VR when a member is interested in any type of employment.

RSA/VR

n/a

14(c) Certificate Holder

When youth express interest in starting subminimum wage employment but do not possess documentation of completion of required activities provided by RSA/VR.

Youth 24 and Younger

Youth or youth's representative can self-refer at any time.

HOW TO REFER YOUTH TO RSA/VR

PEA

A complete VR referral packet includes 3 items; 1) a school or VR-approved Release of Information where the youth's representative (or student who is age of majority) signs the form giving the PEA permission to release the necessary student records to VR; 2) the VR Referral form (which can be found online at the [RSA Internet page](#)), and, 3) documentation that shows evidence of the student's diagnosis and/or disability-related functional limitations (e.g. IEP).

DDD

The DDD Support Coordinator shall complete a [Referral to Vocational Rehabilitation Form DDD-1328A](https://des.az.gov/file/2970/download) <https://des.az.gov/file/2970/download> and prepare a referral packet including:

- Completed Referral Form,
- Member's ISP (Individual Support Plan),
- Documentation supporting member's disability, and
- Any additional information that might be useful, such the Member's IEP, Person Centered Plan, or the Behavioral Assessment.

The Support Coordinator shall submit the completed packet to the DDD Employment Service Specialist, who will review and forward the Referral Packet to the RSA/VR Counselor.

AHCCCS

For members, with the exception of individual determined to have a Serious Mental Illness (SMI), contact VR to find [RSA Office Locations](#).

For members determined to have a Serious Mental Illness (SMI) and enrolled with a Regional Behavioral Health Authority (RBHA), who are interested in employment with a sub-minimum wage, contact the VR Counselor assigned to the behavioral health outpatient clinic to apply for VR services. The RBHA Employment Specialist shall prepare the normal referral packet that is completed for members determined SMI, as outlined in the Interagency Service Agreement (ISA).

RSA/VR

n/a

14(c) Certificate Holder

If youth has a DDD Support Coordinator: refer youth or youth's representative back to DDD to request referral to RSA/VR.

If youth does not have DDD Support Coordinator:

Provide youth or youth's representative with contact information for RSA/VR:

Phone: 1-800-563-1221

Or complete a referral form online at the [RSA Internet page](#).

Youth 24 and Younger

Ask DDD Support Coordinator or School Staff for a referral to RSA/VR.

Or

Contact the RSA/VR program directly by calling 1-800-562-1221 or complete a referral form online at the [RSA Internet page](#).

Part 2 Table: For Individuals of All Ages Working in Subminimum Wage Employment

IMPACT OF 511
<p>RSA/VR RSA/VR is responsible for providing Career Counseling and Information and Referral to individuals of all ages working in subminimum wage employment with a 14(c) Certificate Holder at various intervals throughout the duration of their employment. Individuals must complete Career Counseling and Information and Referral services at the required intervals in order to maintain their subminimum wage employment with a 14(c) Certificate holder.</p>
<p>14(c) Certificate Holder 14(c) Certificate Holders may not continue to employ individuals of any age in subminimum wage employment without verifying that Career Counseling and Information and Referral services have been completed at required intervals throughout the individual's employment.</p>
<p>Individual in Subminimum Wage Employment Individuals of any age in subminimum wage employment must complete Career Counseling and Information and Referral services provided by RSA/VR and obtain documentation of the completion of those activities at required intervals throughout their employment in order to continue working in subminimum wage with a 14(c) Certificate Holder.</p>
RESPONSIBILITIES UNDER 511
<p>RSA/VR RSA/VR staff will coordinate with 14(c) Certificate Holders to arrange the provision of career counseling and information and referral services at the required intervals for individuals currently in subminimum wage employment. Documentation will be provided to the individual or the individual's representative within 45 calendar days of completion of the activity or within 10 calendar days of refusal. With the youth/youth representative's permission, a copy of the documentation will be provided to the 14(c) Certificate Holder.</p>
<p>14(c) Certificate Holder 14(c) Certificate Holders are required to verify completion of career counseling and information and referral services by RSA/VR for all individuals, regardless of age who are paid subminimum wage. 14(c) Certificate Holders must provide information about local self-advocacy, self-determination, and peer mentoring training opportunities at the required intervals for individuals currently in subminimum wage employment. These training opportunities may not be provided by the 14(c) Certificate Holder.</p>
<p>Individual in Subminimum Wage Employment Individuals referred to RSA/VR to receive Career Counseling and Information and Referral must participate in the service, receive documentation of the completion of the service, and provide that documentation to the 14(c) Certificate Holder in order to maintain subminimum wage employment. Individuals working in subminimum wage employment are responsible for providing all documentation provided by RSA/VR to the 14(c) Certificate Holder for verification.</p>

WHEN TO REFER INDIVIDUALS TO RSA/VR

RSA/VR

n/a

14(c) Certificate Holder

Individuals entering subminimum wage employment after July 22, 2016 must receive career counseling and information and referral services as well as self-determination, self-advocacy, and peer mentoring training information every six months during the first year of employment and annually thereafter.

Individuals entering subminimum wage employment prior to July 22, 2016 must receive career counseling and information and referral services as well as self-determination, self-advocacy, and peer mentoring training information once by July 22, 2017 and annually thereafter.

Individual in Subminimum Wage Employment

14(c) Certificate Holders will facilitate the referral to RSA/VR for Career Counseling and Information and Referral services.

HOW TO REFER INDIVIDUALS TO RSA/VR

RSA/VR

14(c) Certificate Holder

Email RSA511Referrals@azdes.gov to arrange a Career Counseling and Information and Referral services for individuals working in subminimum wage employment.

Individual in Subminimum Wage Employment

n/a

Sample Documents

Below figures are the sample documents provided by VR to a Youth seeking subminimum wage employment (youth will receive additional forms (not shown here) depending on the services the youth completes or refuses):

Figure 1: Sample form- Verification of Career Counseling and Information and Referral (RSA-511C)

VERIFICATION OF CAREER COUNSELING AND INFORMATION/REFERRAL (RSA-511C)

*This form is to be completed by Rehabilitation Services Administration (RSA) personnel. A copy of this completed form must be provided to the youth/ youth representative within 45 days of completion or within 10 days of refusal for the service listed below. A copy must be maintained by RSA in the client case file. *NOTE: REFUSAL TO PARTICIPATE in the required services/activities will result in the inability to enter subminimum wage employment with a 14c Subminimum Wage Certificate Holder.*

NAME OF THE YOUTH: [REDACTED]
DATE OF BIRTH: [REDACTED]
NAME OF YOUTH REPRESENTATIVE (IF APPLICABLE): [REDACTED]

CAREER COUNSELING, INFORMATION AND REFERRAL WAS:
 COMPLETED BY THE YOUTH
 *REFUSED BY THE YOUTH/YOUTH REPRESENTATIVE

DATE OF COMPLETION OR REFUSAL: [REDACTED]

PROVIDER OF THE SERVICE (IF SERVICE WAS COMPLETED): [REDACTED]

DESCRIPTION OF THE SERVICE, INCLUDING REASON FOR REFUSAL IF APPLICABLE: [REDACTED]

DATE THIS DOCUMENT WAS PROVIDED TO THE YOUTH/YOUTH REPRESENTATIVE: [REDACTED]

METHOD BY WHICH THIS DOCUMENT WAS PROVIDED TO THE YOUTH/YOUTH REPRESENTATIVE: By Hand Email Mail Other

X

SIGNATURE of RSA personnel documenting service completion or refusal Date

X

SIGNATURE of RSA personnel providing documentation to the youth/youth representative Date

X

*SIGNATURE of the youth/youth representative [required only in the case of service refusal] Date

Figure 2: Sample form - Verification of Service Cover Sheet (RSA-511F)

VERIFICATION OF SERVICES COVER SHEET (RSA-511F)

This form is to be completed by Rehabilitation Services Administration (RSA) personnel. A copy of this completed form must be provided to the youth/ youth representative when the last verification of services form is provided to the youth/youth representative. A copy must be maintained by RSA in the client case file.

NAME OF THE YOUTH: [REDACTED]
DATE OF BIRTH: [REDACTED]
NAME OF YOUTH REPRESENTATIVE (IF APPLICABLE): [REDACTED]

THE FOLLOWING DOCUMENTS WERE PROVIDED TO THE YOUTH/YOUTH REPRESENTATIVE BY RSA PERSONNEL:

Documentation Required for All Youth

- Completion Refusal: *Pre-Employment Transition Services or Transition Services*
- Completion Refusal: *Application for VR services and eligibility determination*
- Completion Refusal: *Career Counseling, Information and Referral*

Additional Documentation Required for Youth Determined Eligible for VR Services

- Completion Refusal: *Development and implementation of Individualized Plan for Employment (IPE) with a specific employment goal consistent with competitive and integrated employment, Receipt of IPE services including reasonable accommodations and supports, for a reasonable period of time, and Case Closure based on the determination that the youth is unable to reach their employment goal*

X _____
Signature of RSA personnel Date

Figure 3: Sample form – Career Counseling and Information/ Referral for Individuals Engaged in Subminimum Wage Employment



Douglas A. Ducey
Governor

Michael Traylor
Director

**CAREER COUNSELING AND INFORMATION/REFERRAL
FOR INDIVIDUALS ENGAGED IN SUBMINIMUM WAGE EMPLOYMENT**

*This form is to be completed by Rehabilitation Services Administration (RSA) personnel. A copy of this completed form must be provided to the individual/individual's representative within 45 days of completion or within 10 days of refusal for the service listed below. A copy must be maintained by RSA in the client case file. *NOTE: REFUSAL TO PARTICIPATE in the required services/activities will result in the inability to continue subminimum wage employment with a 14c Subminimum Wage Certificate Holder.*

NAME OF THE INDIVIDUAL: [REDACTED]

CAREER COUNSELING, INFORMATION AND REFERRAL WAS:

- COMPLETED BY THE INDIVIDUAL
- *REFUSED BY THE INDIVIDUAL/OR REPRESENTATIVE

DATE OF COMPLETION OR REFUSAL: [REDACTED]

PROVIDER OF THE SERVICE (IF SERVICE WAS COMPLETED): Rehabilitation Services Administration

DESCRIPTION OF THE SERVICE, INCLUDING REASON FOR REFUSAL IF APPLICABLE: [REDACTED]

DATE THIS DOCUMENT WAS PROVIDED TO THE INDIVIDUAL OR REPRESENTATIVE: [REDACTED]

METHOD BY WHICH THIS DOCUMENT WAS PROVIDED TO THE INDIVIDUAL OR REPRESENTATIVE: By Hand Email Mail Other

X _____
SIGNATURE of RSA personnel documenting service completion or refusal Date

X _____
SIGNATURE of RSA personnel providing documentation to the individual/or representative Date

X _____
*SIGNATURE of the to the individual/or representative Date
[required only in the case of service refusal]

Equal Opportunity Employer/Program • Under Titles VI and VII of the Civil Rights Act of 1964 (Title VI & VII), and the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title II of the Genetic Information Nondiscrimination Act (GINA) of 2008; the Department prohibits discrimination in admissions, programs, services, activities or employment based on race, color, religion, sex, national origin, age, disability, genetics and retaliation. The Department must make a reasonable accommodation to allow a person with a disability to take part in a program, service or activity. Auxiliary aids and services are available upon request to individuals with disabilities. For example, this means if necessary, the Department must provide sign language interpreters for people who are deaf, a wheelchair accessible location, or enlarged print materials. It also means that the Department will take any other reasonable action that allows you to take part in and understand a program or activity, including making reasonable changes to an activity. If you believe that you will not be able to understand or take part in a program or activity because of your disability, please let us know of your disability needs in advance if at all possible. To request this document in alternative format or for further information about this policy, contact your local office manager; TTY/TDD Services: 7-1-1. • Free language assistance for DES services is available upon request. • Ayuda gratuita con traducciones relacionadas a los servicios de DES está disponible a solicitud del cliente.