



## Pre-Employment Transition Services Frequently Asked Questions

### Pre-Employment Transition Services

#### The Basics

The Workforce Innovation and Opportunity Act (WIOA) amended the Rehabilitation Act of 1973 and requires Vocational Rehabilitation (VR) agencies to set aside federal funds for the statewide provision of Pre-Employment Transition Services (pre-ETS) to "students with disabilities who are eligible or potentially eligible for VR services." A student with a disability is an individual with a disability in a secondary, postsecondary, or other recognized education program who:

- is between the ages of 14 and 22 years old; and
- is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act (IEP, 504 plan); or
- is a student with a disability for purposes of Section 504

The five required pre-ETS activities are as follows, along with *examples* for each required activity:

- 1 Job exploration counseling
  - Discussion of vocational interests
  - Review of local labor market and in-demand industries and occupations
  - Non-traditional employment options
  - Identification of career pathways of interest to the students
- 2 Work-based learning experiences
  - Apprenticeships (not including registered and pre-apprenticeships) and job shadowing
  - Paid and non-paid internships and/or work experiences
  - Informational interviews
  - Volunteering
- 3 Counseling on postsecondary opportunities
  - Gaining awareness of career pathways
  - Promoting participation in postsecondary education
  - Attending college fairs and tours
- 4 Workplace readiness training
  - Receive training on communication, problem solving, and other specific social and interpersonal skills as well as independent living skills
- 5 Instruction in self—advocacy
  - Training on self-awareness, disclosure of disability, and knowing individual rights and responsibilities

# Pre-Employment Transition Services FAQs *continued*

The four pre-ETS coordination activities are:

1. Attending individualized education program meetings for students with disabilities, when invited;
2. Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
3. Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
4. When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

**Staff time spent directly providing or arranging for one or more of the 5 required pre-ETS activities listed above or engaging in one or more of the 4 coordination activities should be counted towards your pre-ETS time charging in People Soft. This can also include staff travel time.**

## **The FAQs**

### **1. Can Case Coordinators charge time under Pre-ETS?**

Yes, any VR staff person who engages in either a required or coordinating Pre-ETS activity can and should charge that time under the appropriate "Activity ID" code on their PeopleSoft timesheet:

- **PRE\_REQ** – for pre-ETS required activities
- **PRE\_COR** – for pre-ETS coordinating activities

**NOTE:** *the code AUTHPRE is reserved for the Director and Coordinator of Youth Services and should not be used by other VR staff.*

### **2. What is the minimum amount of time that can be recorded on your PeopleSoft timesheet?**

A quarter of an hour (.25) is the minimum amount of time that can be entered in PeopleSoft. You will have to round up or down depending on the amount of time spent in pre-ETS activities. Once you've added up total minutes doing pre-ETS in either category for the day, you would need to round up to the nearest 15 minutes for anything that's 8 minutes or more (e.g., you spend 1 hour and 9 minutes doing pre-ETS coordination activities, you would then put 1.25 hours on your timesheet with the code PRE\_COR). Anything that is 7 or fewer minutes would be rounded down (e.g., you spend 2 hours and 6 minutes doing pre-ETS required activities, you would then list 2.00 hours on your PeopleSoft timesheet with the code PRE\_REQ).

### **3. Can more than 1 VR staff member provide/count pre-ETS activities during the same time or activity? For instance, when several staff members attend a school transition fair?**

There are a couple of items to consider here. First, the entire time for an activity of this nature would not be counted towards pre-ETS. Unless a staff person is engaging in or arranging for one of the 5 required activities or working on one of the 4 coordination activities, time spent at a transition fair or other similar event should not be counted towards pre-ETS. Secondly, any time that *is* counted should be attributed to the staff person directly involved in the activity. For instance, if a counselor is discussing post-secondary options with a student with a disability at a transition fair, that time can be counted towards pre-ETS (no need to enter that student into the portal in this case) on their timesheet. Two staff people should not count the same time or activity as pre-ETS on their timesheet.

### **4. I have a student with a disability without an IEP or 504 plan, can he still receive pre-ETS?**

Yes, that student is eligible to receive pre-ETS although some type of disability documentation (e.g., doctor's note, SSI/SSDI verification) would still be required. Unfortunately, this is not something that VR can pay for through pre-ETS funding, so the student or a family member would need to provide documentation, or the VR counselor or pre-ETS provider could get a release to send for the disability documentation.

## Pre-Employment Transition Services FAQs *continued*

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**5. I am working with a student at a school that does not yet have a pre-ETS provider, can she still receive pre-ETS?**

In many cases, a student at a school without a pre-ETS provider may still be able to receive pre-ETS from the provider in that county. With the proper permission, you would send an email containing basic contact information for the student (name, email or mailing address, high school name, and anticipated graduation date) to the provider in the area as well as the Director of Youth Services. The provider will determine whether or not they can serve this student. If they can, they will request that the case be transferred and will contact the student. If they are unable to serve, the provider will communicate this to the family.

**6. Once a student turns 22, does pre-ETS stop?**

A student with a disability is allowed to receive pre-ETS through their 22nd year (i.e., up until the day they turn 23). Remember, a student is eligible to receive special education until the end of the school year in which the student reaches the age of 22. So, there would be no 23 year olds enrolled in special education in high school. This could affect post-secondary students enrolled in pre-ETS. A student with a disability enrolled in a post-secondary program could receive pre-ETS until the day they turn 23, at which point, pre-ETS is required to end.

**7. What happens when a student completes pre-ETS?**

Providers cannot bill for assisting a student with a VR referral, however, providers are encouraged to make that connection when needed. A portfolio is required to be developed for each student exiting pre-ETS which should include a list of community resources and potential employers.

**8. How can a counselor access pre-ETS information when needed?**

We are working on expanding pre-ETS access for intake counselors, supervisors, and region managers. This will allow them to review pre-ETS activities, run reports, and download pre-ETS documents, including IEPs, intake rubrics and portfolio information. They will not be able to make changes to the pre-ETS file. Until this occurs, please contact Jonathan or Will to request information.

**9. If the VRC and pre-ETS provider are working with a student who is doing a work experience and the student is offered a job, who fills out the NOJO?**

The goal of Pre-ETS is not to find employment for a student, but rather to give students the skills and abilities to find employment in the future. Because of this, Pre-ETS providers do not offer traditional job coaching services and would not be expected to complete a Notice of Job Offer. If the student is also receiving "regular" VR services, then it would fall on the ES provider to complete the NOJO. If the student is offered a job and is not receiving VR services, but is expected to need support on that job or requires other VR services, they would need to be referred to VR as soon as possible.

**10. If I worked on pre-ETS activities with a student and they are already in the portal and in-service, do I still count this towards my pre-ETS time, even if the student has been transferred to a provider and I cannot enter any further information in the portal?**

Yes, this should still be counted towards pre-ETS on your PeopleSoft timesheet. The main purpose of the portal for intake counselors is to ensure that a student is entered and in-service so that if they are deferred, they will still be able to receive pre-ETS. If a student is listed as in-service in the portal (either by you or someone else) there is no need to enter anything else into the portal for that individual.

**11. A counselor is helping with an employment boot camp done by a pre-ETS provider, to help students learn how to appropriately disclose a disability. Is the VRC allowed to provide direct services to pre-ETS students for this?**

Yes, in fact I would encourage counselors to assist in this way when asked and if they have the time. This would be added to their PeopleSoft time sheet.

## Pre-Employment Transition Services FAQs *continued*

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**12. I have a client in a Vet Tech program who will be ready for an internship in the fall. Can both pre-ETS and ES help find the internship?**

In general, either the pre-ETS provider or the ES provider should work on this, not both. However, they could potentially discuss their options together to come up with something for the student and ensure they are not duplicating efforts.

**13. A student is enrolled in a school that's not officially recognized by DOE. It is not listed on the Excel sheet on their website: <http://www.doe.in.gov/idoe/idoe-data> and is considered more of a "group-home schooling" situation. How is this entered into the portal?**

For schools of this sort, enter the student into the portal and choose "home-schooled" as the option. If you are in doubt, contact Jonathan or Will (or send an email to [FSSA.pre-ETS@fssa.in.gov](mailto:FSSA.pre-ETS@fssa.in.gov) and they will research this for you.

**14. A student needs to be closed status 28. Will she continue to be able to receive pre-ETS (or to receive pre-ETS at all if she is not currently enrolled in a pre-ETS program)?**

Yes, a student closed unsuccessfully can receive pre-ETS. As long as a student is not found ineligible, they will continue to be eligible for pre-ETS.

And, don't forget! A student who is deferred for services can receive pre-ETS as long as at least 1 pre-ETS activity was listed in the portal prior to them being deferred for VR services.

**15. A student received a Trial Work Experience that was unsuccessful and was found ineligible for services. Would this student be able to receive pre-ETS?**

No. If a student is found ineligible for VR for any reason, then that student cannot receive pre-ETS even if they are currently (or have previously) received pre-ETS. This is because pre-ETS is restricted to students with disabilities who are either *eligible or potentially eligible* for VR. A student who has been found ineligible would not fit into either of these categories. In situations where a TWE is needed, I would encourage you to talk to the parents or guardians about this possibility so they can determine if they wish to move forward with the TWE.

**NOTE:** this is different than a student being deferred for services. In these cases, as long as the student has received at least one service, then they can receive pre-ETS even if in deferred status.

Please direct any questions or concerns to the Pre-ETS mailbox at [fssa.pre-ets@fssa.in.gov](mailto:fssa.pre-ets@fssa.in.gov).

BRS Training Briefs are periodic publications by the Bureau of Rehabilitation Services for the purposes of internal staff training.

Theresa Koleszar, Director, Bureau of Rehabilitation Services  
Jeffery Russell, Director of Operations, Bureau of Rehabilitation Services  
Steve Upchurch, Training and Professional Development Manager, Vocational Rehabilitation Services