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
   - Connecting students to services and supports from agencies that assist people with disabilities

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

Methods of Delivery:
Both Vocational Rehabilitation Counselors and contracted vendors provide pre-ETS to students with disabilities throughout the state. Pre-ETS are provided and recorded in the following ways:
1. Contracted Pre-ETS Providers

Currently, there are 10 pre-ETS contractors, who are working with other providers, to “directly provide” pre-ETS on a fee for service model. For the latest listing of counties and school systems covered by providers, please refer to this link: https://www.in.gov/fssa/ddrs/5474.htm. Providers are responsible for delivery of the 5 required pre-ETS activities to students within their counties and agreed-upon school systems. Providers work with school systems on identifying students and determining with BRS the appropriate pre-ETS curricula that will supplement, but not supplant existing school activities and meet the needs of each individual student. Intake and service session information is entered into a pre-ETS Web Portal developed specifically for this purpose and information is verified and monitored by BRS.

*Definition:

“directly provide” - For purposes of contracted pre-ETS Providers, “directly provide” refers to activities offered to students with disabilities. Examples of services offered directly may include, but are not limited to:

- **Job Exploration Counseling:** Offer courses on exploring interests and career choices, understanding in-demand occupations and the local labor market.
- **Work-Based Learning Experiences:** Facilitate informational interviews, job shadowing, worksite tours, internships (paid/unpaid), and mentoring opportunities.
- **Counseling on Postsecondary Opportunities:** Explore options for postsecondary schools, review funding opportunities, and coordinate informational meetings with students and representatives from local postsecondary institutions.
- **Workplace Readiness Training:** Offer trainings and classes on soft skills and social awareness skills. Teach students job seeking skills, communication and interpersonal skills, financial literacy, and self-management skills for work, home, and school.
- **Instruction in Self-Advocacy:** Teach specific workplace self-advocacy skills such as when/how to disclose a disability, request an accommodation, and strategies on how to best get necessary supports.

2. VR Counselors Delivering Pre-ETS

VR counselors are not responsible for monitoring the delivery of pre-ETS through our contracted providers. However, VR Counselors do provide pre-ETS to students with disabilities as part of their regular job duties and are responsible for recording their time spent in these activities. There are 3 different situations in which VRCs may provide pre-ETS to students with disabilities:

I. **Delivery of pre-ETS to potentially eligible students:** When conducting an intake for a student with a disability who is potentially eligible for VR services, VRCs are responsible for using the “Statewide Search” function in the pre-ETS web portal to determine if the individual is currently receiving pre-ETS services through a contracted provider. Depending upon the student’s status, there are 4 possible actions:

A. Student is not listed in the portal – VR Counselor should enter intake information into the portal and at least 1 service session, depending upon your discussion with the student. If the student attends a school that is currently active with pre-ETS, the counselor notifies both the Director of Youth Services and the contract lead. If the student attends a school that is not yet part of pre-ETS, the counselor notifies both the Director of Youth Services and the pre-ETS contractor, and provides the contractor with basic contact information. A list of providers with contact information can be found at: https://www.in.gov/fssa/ddrs/5474.htm.

B. Student is listed in the portal as “In-Service” – do not add anything to the web portal. Proceed with your regular VR intake.

C. Student is in “Intake” status – determine the provider working with the student, contact that provider and request that a Pre-ETS activity be provided to the student as soon as possible.

D. Student is in “Inactive” status – determine if any services have been provided. If services have been provided, do not add anything to the portal. Proceed with your regular VR intake. If services have not been provided, contact Jonathan or Will at the Pre-ETS email listed below.
II. **Delivery of pre-ETS to current VR clients:** During the course of their regular duties, VRCs may “provide and/or arrange for” pre-ETS to students with disabilities already on their caseloads. Specific VR services, when delivered to a student with a disability, age 14 to 22, count as pre-ETS. Additionally, time spent not in direct service, but ARRANGING FOR the provision of any of the following services, also counts as pre-ETS. Time spent both providing direct pre-ETS activities and time spent arranging for those pre-ETS activities should be entered on a separate line on your timesheet, and the Activity ID VR_PETS should be selected. The following definitions will help you determine if you have provided or arranged for pre-ETS activities to any existing clients on your caseload. If you have provided any of the following services to a student with a disability (this is not a comprehensive list), in addition to recording this on your PeopleSoft timesheet, please also ensure that a case note has been added to IRIS describing the specific activity.

*Definition:*
“provide and/or arrange for” - For purposes of VR Counselors, “providing and/or arranging for pre-ETS” refers to activities completed in support of a student’s pre-ETS needs. Examples of activities may include, but are not limited to:

- **Job Exploration Counseling:** Discussion of vocational interests, review of job search sites such as The Career Index or Indiana Career Connect, administering interest inventories.
- **Work-Based Learning Experiences:** Discussion of local work experience options that may be available to the student, assistance in applying for internships, discussion of volunteer opportunities.
- **Counseling on Postsecondary Opportunities:** Discussion of financial aid options, referral to post-secondary disability services office, discussion of post-secondary education options, including career pathways and certification training.
- **Workplace Readiness Training:** Discussion of employer requirements, review of soft skills and self-management, counseling on financial literacy.
- **Instruction in Self-Advocacy:** Discussion of and/or referring to Centers for Independent Living, counseling on self-disclosure and rights/responsibilities.

**NOTE:** Staff travel time should be included when considering time spent providing or arranging for the delivery of pre-ETS. For example: if a counselor traveled a half-hour off-site to meet with a student and provided 1 hour of job exploration counseling, then traveled another half-hour back to the hub, the counselor would document 2 hours of pre-ETS on their timesheet.

III. **Delivery of Pre-ETS coordinating activities:** In addition to tracking and recording time for the direct provision, or arrangement of pre-ETS, counselors should also record the following pre-ETS coordination activities:

- a. Attending IEP meetings, when invited;
- b. Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities available throughout the school year;
- c. 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;
- d. When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act.

Time spent in any of the coordinating activities (a. through d. above) should be noted on the VRC’s PeopleSoft timesheet under the Activity ID VR_PETS. Note that these coordinating activities do not need to be tied to a specific VR client in either IRIS or the pre-ETS web portal, but should simply be noted on the VRC’s timesheet.

Please direct any questions or concerns to the Pre-ETS mailbox at fssa.pre-ets@fssa.in.gov.