



Report to the Ranking Member,  
Committee on Health, Education, Labor,  
and Pensions, U.S. Senate

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September 2018

# STUDENTS WITH DISABILITIES

Additional Information  
from Education Could  
Help States Provide  
Pre-Employment  
Transition Services

# GAO Highlights

Highlights of [GAO-18-502](#), a report to the Ranking Member, Committee on Health, Education, Labor, and Pensions, U.S. Senate

## Why GAO Did This Study

WIOA requires states to reserve at least 15 percent of their total State Vocational Rehabilitation Services program funds to provide pre-employment transition services to help students with disabilities transition from school to work. GAO was asked to review how states were implementing these services.

This report examines (1) steps states reported taking to implement pre-employment transition services, and (2) implementation challenges states reported and how Education has addressed them. GAO reviewed documents and funding data from Education, and federal laws and regulations; surveyed all 79 state VR agencies (74 responded); held discussion groups with representatives of 29 state VR agencies; and interviewed officials from Education and three states (Idaho, Illinois, and Maryland) GAO selected for variety in size and type of agencies, among other factors.

## What GAO Recommends

GAO is recommending that Education (1) establish timeframes for providing additional information on allowable expenditures, (2) take additional steps to assist states that have not updated and finalized their interagency agreements, and (3) develop a written plan with specific timeframes and activities for identifying and disseminating best practices. Education agreed with the first recommendation and disagreed with the other two. GAO revised the second recommendation and maintains that specific information is needed for the third, as discussed in the report.

View [GAO-18-502](#). For more information, contact Elizabeth H. Curda at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov).

September 2018

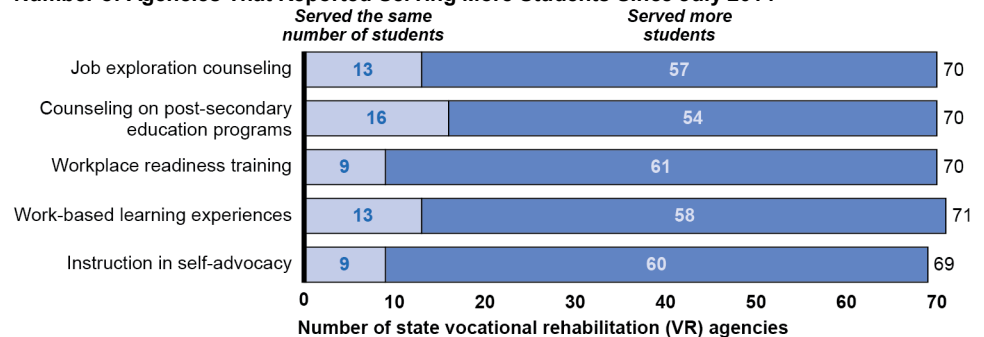
## STUDENTS WITH DISABILITIES

### Additional Information from Education Could Help States Provide Pre-Employment Transition Services

## What GAO Found

Of the 74 state vocational rehabilitation (VR) agencies that responded to GAO's survey, most reported expanding services to help students with disabilities transition from school to work as required under the Workforce Innovation and Opportunity Act (WIOA), enacted in July 2014. Most state agencies reported serving more students and providing work-based learning experiences and other activities, referred to as pre-employment transition services (see figure).

Number of Agencies That Reported Serving More Students Since July 2014



Source: GAO survey of state VR agencies. | GAO-18-502

Note: There were 74 respondents. Totals do not sum to 74 because for each service one respondent reported decreases in the number of students served and the remainder either did not answer the question or responded "don't know."

State VR agencies reported two key challenges with implementing pre-employment transition services for students as required by WIOA.

**Spending reserved funds:** States reported spending about \$357 million out of the \$465 million reserved for these services in fiscal year 2016. Education officials said that states had difficulty determining what expenditures were allowable, and some state officials said they would like more detailed information from Education. Education officials said they plan to clarify guidance but have no timeframe for providing further information, which would help states to better plan their use of reserved funds.

**Finalizing interagency agreements:** Fewer than half the state VR agencies that responded to GAO's survey (34 of 74) reported updating their interagency agreement with their state's educational agency. Interagency agreements can help promote collaboration by, for example, establishing roles and responsibilities of each agency. Although Education offers technical assistance on interagency agreements, without increased efforts to raise awareness about the importance of these agreements and provide assistance to states where needed, Education may miss opportunities to help state VR and educational agencies efficiently and effectively coordinate services.

In addition, WIOA requires Education to highlight best state practices, and most VR agencies responding to GAO's survey (63 of 74) reported this would be useful. Education does not have a written plan or timeframe for identifying and disseminating best practices. As a result, Education may miss opportunities to help more students with disabilities successfully transition from school to work.

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## Abbreviations

CSAVR	Council of State Administrators of Vocational Rehabilitation
Education	U.S. Department of Education
IDEA	Individuals with Disabilities Education Act
IEP	individualized education program
NCSAB	National Council of State Agencies for the Blind
NTACT	National Technical Assistance Center on Transition
Rehabilitation Act	Rehabilitation Act of 1973
RSA	Rehabilitation Services Administration
VR	vocational rehabilitation
WIOA	Workforce Innovation and Opportunity Act
WINTAC	Workforce Innovation Technical Assistance Center

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September 6, 2018

The Honorable Patty Murray  
Ranking Member  
Committee on Health, Education, Labor, and Pensions  
United States Senate

Dear Senator Murray:

The transition from high school to postsecondary education or the workforce can be a challenging time for students, and particularly for those with disabilities who may need additional services or guidance to achieve their goals. We have reported that students with disabilities are less likely than their peers to transition successfully.<sup>1</sup> In addition, people with disabilities have historically experienced higher unemployment and poverty rates than those without disabilities.<sup>2</sup> Students with disabilities who do not successfully transition from school to the workforce may face a lifetime of reliance on public assistance, potentially leading to substantial costs to the government and society. While states provide transition services through special education in schools and to some students who apply and are determined eligible for the State Vocational Rehabilitation Services program, the Workforce Innovation and Opportunity Act (WIOA) amended the Rehabilitation Act of 1973 (Rehabilitation Act) in 2014 to require states to additionally provide a defined set of activities called pre-employment transition services.<sup>3</sup> These services are to be provided both to students who are eligible for the program as well as to those who are potentially eligible, greatly expanding the number of students who can be served. Pre-employment transition

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<sup>1</sup>GAO, *Students with Disabilities: Better Federal Coordination Could Lessen Challenges in the Transition from High School*, [GAO-12-594](#) (Washington, D.C.; July 12, 2012).

<sup>2</sup>U.S. Department of Labor, Bureau of Labor Statistics, *Labor Force Statistics from the Current Population Survey*, (Washington, D.C.: Data extracted on June 11, 2018); and U.S. Department of Commerce, Economics and Statistics Administration, U.S. Census Bureau, *Income and Poverty in the United States: 2016, Current Population Reports*, P60-259 (Washington, D.C.: September 2017).

<sup>3</sup>Pub. L. No. 113-128, § 422, 128 Stat. 1425, 1657 (2014) (codified at 29 U.S.C. § 733). The State Vocational Rehabilitation Services program provides services that, among other things, help individuals, including students with disabilities obtain employment, including counseling and training. To be eligible, an individual must be an “individual with a disability,” which means that the individual has a physical or mental impairment which constitutes or results in a substantial impediment to employment and can benefit in terms of an employment outcome from vocational rehabilitation services.

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services are offered as an early start on job exploration and are designed to help these students identify their career interests. Specifically, states are required to offer job exploration counseling and work-based learning experiences, which may include internships, exposures to local employment, and other activities.

In fiscal year 2017, the Department of Education (Education) awarded about \$3.1 billion in grants to states for the State Vocational Rehabilitation Services program. WIOA requires states to reserve at least 15 percent of their vocational rehabilitation (VR) grants to provide pre-employment transition services to all eligible or potentially eligible students with disabilities who need them.<sup>4</sup> That reserve amounted to about \$468 million across all states in fiscal year 2017.

You asked us to provide information on how states are implementing pre-employment transition services. This report examines (1) the steps states have reported taking to implement pre-employment transition services, and (2) the implementation challenges, if any, states have reported facing, and how Education has addressed them.

To obtain information on both of these objectives, we used the following methodologies. We reviewed Education's guidance and technical assistance documents as well as federal laws and regulations.<sup>5</sup> We reviewed expenditure data reported by state VR agencies to Education for fiscal years 2015 and 2016, the most recent full years of data available, and determined they were reliable for the purposes of this review by interviewing Education officials about the data's quality and by electronically testing the data for any obvious errors. We administered a web-based survey to all 79 state VR agencies from October through

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<sup>4</sup>The statutory requirements governing the State Vocational Rehabilitation Services program, including those related to the provision of pre-employment transition services, are found in the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA). However, because this report focuses on certain requirements added to the Rehabilitation Act by WIOA, for ease of reference we refer to these provisions as WIOA requirements.

<sup>5</sup>We did not assess states' compliance with WIOA requirements; rather, this report conveys information that states reported to us about steps they have taken and the challenges they faced in implementing pre-employment transition services.

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December 2017, with 74 agencies (94 percent) responding.<sup>6</sup> We conducted interviews with state VR and educational officials in Idaho, Illinois, and Maryland. We selected these states based on variety in the size of the special education population, state agency organization, and whether the state had a separate agency for serving individuals who are blind or visually impaired. The information from these interviews is not generalizable. We interviewed representatives of other relevant organizations, including the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Council of State Agencies for the Blind. In addition, we interviewed officials from Education’s Office of Special Education and Rehabilitation Services, Rehabilitation Services Administration, Office of Special Education Programs, and the Workforce Innovation Technical Assistance Center and National Technical Assistance Center on Transition—two technical assistance centers funded by Education. We also convened three discussion groups with state VR agency directors or their designated representatives, with a total of 39 participants from 29 separate agencies (10 to 12 agencies represented per discussion group). We invited all state VR agencies to participate through our survey and through the conference organizer (CSAVR). To assess how Education addressed challenges reported by state VR agencies, we compared actions taken by Education to standards for internal control in the federal government. For further details on our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from February 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

The Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA, authorizes a number of grant programs to support employment

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<sup>6</sup>In this report, the term *state VR agencies* refers to agencies in the 50 states, the District of Columbia, and the territories of American Samoa, Guam, Northern Marianas, Puerto Rico, and the Virgin Islands. Twenty-three states have two VR agencies: one dedicated to serving the blind and visually impaired and another designed to serve all other individuals with disabilities. Twenty-seven states, the District of Columbia, and 5 territories have one combined VR agency.



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and independent living for persons with disabilities, including the State Vocational Rehabilitation Services program.<sup>7</sup> This program is the primary federal government effort to help individuals with disabilities prepare for and obtain employment. An individual who is deemed eligible works with state VR agency staff to prepare an individualized plan for employment, which describes the employment goal and the specific services needed to achieve that goal. Education's Rehabilitation Services Administration (RSA) awards funds to state VR agencies through the program to help individuals with disabilities engage in gainful employment. States must provide a 21.3 percent nonfederal match of these funds. In fiscal year 2016, total program funds for VR—including state match funds—were \$3.81 billion.

States, territories, and the District of Columbia generally designate a single agency to administer the program, although, depending on state law, states may designate more than one agency. Twenty-three states have two separate agencies, one that exclusively serves blind and visually impaired individuals (known as agencies for the blind) and another that serves individuals who are not blind or visually impaired (known as general agencies). Twenty-seven states, the District of Columbia, and the five territories have a single combined agency that serves both blind and visually impaired individuals and individuals with other types of impairments (known as combined agencies). In total, there are 79 state VR agencies.

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## Pre-employment Transition Services

In 2014, WIOA amended the Rehabilitation Act to require state VR agencies to provide students with disabilities with pre-employment transition services. According to information Education provided with its regulations, WIOA emphasized the provision of services to students with disabilities to ensure that they have meaningful opportunities to receive training and other supports and services they need to achieve employment outcomes. WIOA requires states to make pre-employment transition services available statewide to all students with disabilities in need of such services, who are eligible or potentially eligible, regardless of whether a student has submitted an application for services from a

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<sup>7</sup>Rehabilitation Act of 1973, Pub. L. No. 93-112, 87 Stat. 355 (codified as amended at 29 U.S.C. §§ 701-7961).

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state VR agency.<sup>8</sup> In this context, students with disabilities include those with an individualized education program (IEP) for special education services through the school system, those receiving an accommodation for their disability, and others.<sup>9</sup> In information provided with the regulations, Education stated that state VR agencies should work closely with school systems and others to identify these students.

WIOA requires each state to reserve at least 15 percent of a state's VR allotment for a fiscal year for pre-employment transition services for students with disabilities.<sup>10</sup> If a state cannot use or match all of its VR funding, it relinquishes funds to the federal government and the state's total award amount is then reduced.<sup>11</sup> However, the state must still reserve 15 percent of what it did not relinquish for the provision of pre-employment transition services.

WIOA established required activities under pre-employment transition services that states must make available to students with disabilities.

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<sup>8</sup>See 29 U.S.C. §§ 705(37) and 733(a). WIOA requires each state to prepare a Unified or Combined State Plan once every 4 years that describes the goals, services, and objectives of its workforce development system. RSA approves the VR services portion of the State Plan, which must include information on formal interagency agreements between the state VR and educational agency that provides for, among other things, procedures for identifying students with disabilities who need pre-employment transition services. Education and the U.S. Department of Labor review and approve each state's Unified or Combined State Plan.

<sup>9</sup>The Individuals with Disabilities Education Act (IDEA) requires that school districts or state educational agencies provide an IEP for all students determined eligible for special education services. The IEP is developed at a meeting by a team that includes, among others, school officials, other educational professionals, and parents. IEP team meetings may also include a representative of any participating agency that is likely to be responsible for providing or paying for transition services. The IEP includes a student's academic performance, academic and functional goals, special education and related services, and other supports to enable advancement toward these goals. See 20 U.S.C. §§ 1412(a)(4) and 1414(d).

<sup>10</sup>The formula for VR state grant allotments incorporates each state's population, average per capita income, and the VR allotment in 1978. WIOA did not provide new funding to states for providing pre-employment transition services; rather, states provide pre-employment transition services from their VR allotment.

<sup>11</sup>If at the end of the fiscal year a state has any unobligated funds remaining from its VR grant awarded in that fiscal year, and for which the state has been able to provide a nonfederal match, those funds can be carried forward into the subsequent fiscal year, including funds reserved for pre-employment transition services. States then have up to one year to obligate and expend the funds that were carried forward.

Education has provided states with additional information about each of the activities (see table 1).

**Table 1: Pre-employment Transition Services Activities Required by the Workforce Innovation and Opportunity Act (WIOA) for Students with Disabilities, and Examples of Each Activity**

Activity	Description
Job exploration counseling	Discussing local labor market information, including in-demand industry sectors and occupations, as well as nontraditional employment and career pathways of interest to the students, as well as administering vocational interest inventories.
Work-based learning experiences	Coordinating such experiences as a school-based program of job training and informational interviews to research employers; work-site tours to learn about necessary job skills, job shadowing, or mentoring opportunities in the community; internships, apprenticeships, short-term employment, and fellowships (paid or unpaid), or on-the-job trainings located in the community.
Post-secondary activity counseling	Providing information on course offerings, career options, and the types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with career fields or pathways.
Workplace readiness training	Helping students with disabilities develop social skills and independent living skills (financial literacy and travel skills); job-seeking skills; and an understanding of employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment.
Self-advocacy	Teaching students about their rights and responsibilities, including how to request accommodations or services and supports and communicate their thoughts, concerns, and needs in the area of education or employment interests.

Source: WIOA and the U.S. Department of Education. | GAO-18-502

After making the required pre-employment transition services available, if a state has funding remaining, WIOA lists nine other “authorized” activities that a state may implement. For example, in providing the authorized activities, states may, among other things, provide training to local VR and educational service providers; coordinate transition services with local educational agencies; and disseminate information about innovative, effective, and efficient approaches to achieve the goals (see appendix II for a full listing of authorized activities). Education’s guidance indicates that such authorized activities should improve the transition of students with disabilities from school to postsecondary education or an employment outcome and support the arrangement or provision of the required activities.

WIOA also requires local offices of state VR agencies to conduct coordination responsibilities, which includes coordinating with state and local educational agencies to ensure the provision of pre-employment transition services. These can be conducted concurrently with the “required” activities, and states can use the reserved funds for them. Examples of coordination responsibilities that local offices of state VR agencies must undertake are attending meetings, when invited, about

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IEPs; and working with the local public workforce system and employers to develop work opportunities for students with disabilities.

In support of this coordination and in recognition that VR and educational agencies both offer transition services to students, WIOA requires that VR agencies establish or update their interagency agreements with states educational agencies.<sup>12</sup> Interagency agreements between the state VR and educational agencies are intended to describe the steps each agency will take to implement pre-employment transition services and determine the roles and responsibilities of each agency, including financial responsibilities and procedures for identifying students in need of pre-employment transition services.<sup>13</sup>

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Federal Guidance,  
Assistance, and  
Monitoring

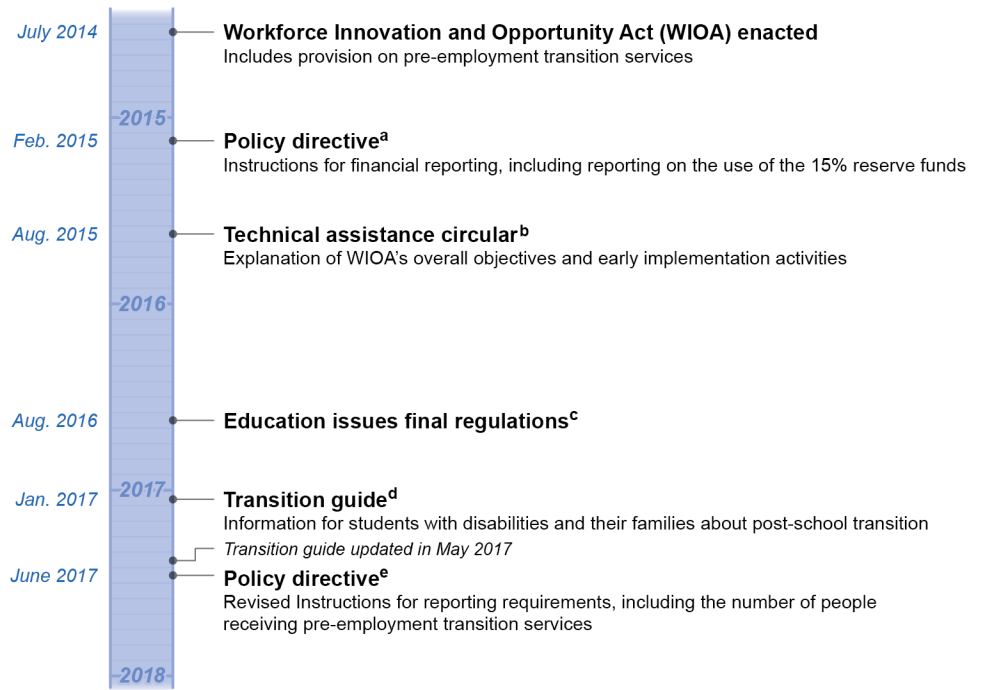
Following the passage of WIOA, Education, through its Rehabilitation Services Administration (RSA), issued regulations and guidance to implement pre-employment transition services requirements (see fig. 1).

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<sup>12</sup>Under the Individuals with Disabilities Education Act (IDEA), students with disabilities who may receive pre-employment transition services may also be eligible for transition services in schools as a part of special education. IDEA requires that, beginning no later than the student's first IEP that is in effect when the student turns 16 (or younger if determined appropriate by the IEP team), a student's IEP must include measurable postsecondary goals and the transition services needed to assist the student in reaching those goals. In many cases, the same activities can be considered pre-employment transition services, VR transition services, or IDEA transition services, according to Education.

<sup>13</sup>See 34 C.F.R. § 361.22(b).

**Figure 1: Timeline of Key Guidance and Federal Regulations by Education Related to Pre-Employment Transition Services for Students with Disabilities After Enactment of the Workforce Innovation and Opportunity Act**



Source: GAO presentation of U.S. Department of Education information. | GAO-18-502

<sup>a</sup>Education, Policy Directive: Revisions to PD-12-06, instructions for completing the Federal Financial Report (SF-425) for the State Vocational Rehabilitation Services program, RSA-PD-15-05, Feb. 5, 2015.

<sup>b</sup>Education, Technical Assistance Circular: Vision for the State Vocational Rehabilitation Services Program as a Partner in the Workforce Development System under the Workforce Innovation and Opportunity Act, RSA-TAC-15-02, Aug. 17, 2015.

<sup>c</sup>Education, State Vocational Rehabilitation Services Program; State Supported Employment Services Program; Limitation on Use of Subminimum Wage, 81 Fed. Reg. 55,630, (Aug. 19, 2016) (codified at 34 C.F.R. pts. 361, 363, and 397).

<sup>d</sup>Education, A Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities, January 2017, and revised May 2017.

<sup>e</sup>Education, Policy Directive: Revision of Policy Directive 16-04 Instructions for the Completion of the Case Service Report Manual (RSA-911) for the State Vocational Rehabilitation Services Program and the State Supported Employment Services Program, RSA-PD-16-04, June 14, 2017.

Education also provided technical assistance to state VR agencies through webinars, conference calls, and presentations at conferences. For example, Education presented information to state officials in a series of webinars about the new programmatic and financial processes and

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procedures related to pre-employment transition services just after the final regulations were issued in 2016. In addition, Education funded technical assistance centers to help state VR agencies and their partners answer questions and provide training about WIOA. Two of these centers are the Workforce Innovation Technical Assistance Center (WINTAC) and the National Technical Assistance Center on Transition (NTACT).<sup>14</sup> Each center focuses its efforts on a specific set of issues: WINTAC on helping state VR agencies implement WIOA requirements, including pre-employment transition services; and NTACT on helping state VR and educational agencies improve outcomes for students receiving transition services.

RSA is to conduct periodic monitoring visits to assess state VR agencies' implementation of the VR program, including pre-employment transition services.<sup>15</sup> RSA is to monitor states for compliance with the administrative, financial, and performance requirements of the program, as well as identify technical assistance needs at individual state VR agencies. According to Education officials, RSA plans to follow a 5-year monitoring cycle that began in fiscal year 2017 and will generally include monitoring visits to 10 states per year through fiscal year 2021. In fiscal year 2017, Education visited 14 VR agencies in 10 states, and in fiscal year 2018, Education plans to visit 15 VR agencies in 12 states.

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<sup>14</sup>In addition to WINTAC and NTACT, Education funds another five technical assistance centers to provide help to state VR agencies in using their program to improve services to help maximize the employment of individuals with disabilities, and enhance their independence and integration into the community and the competitive labor market. WINTAC and NTACT, however, are the centers that provide the principal source of assistance regarding pre-employment transition services, according to Education officials.

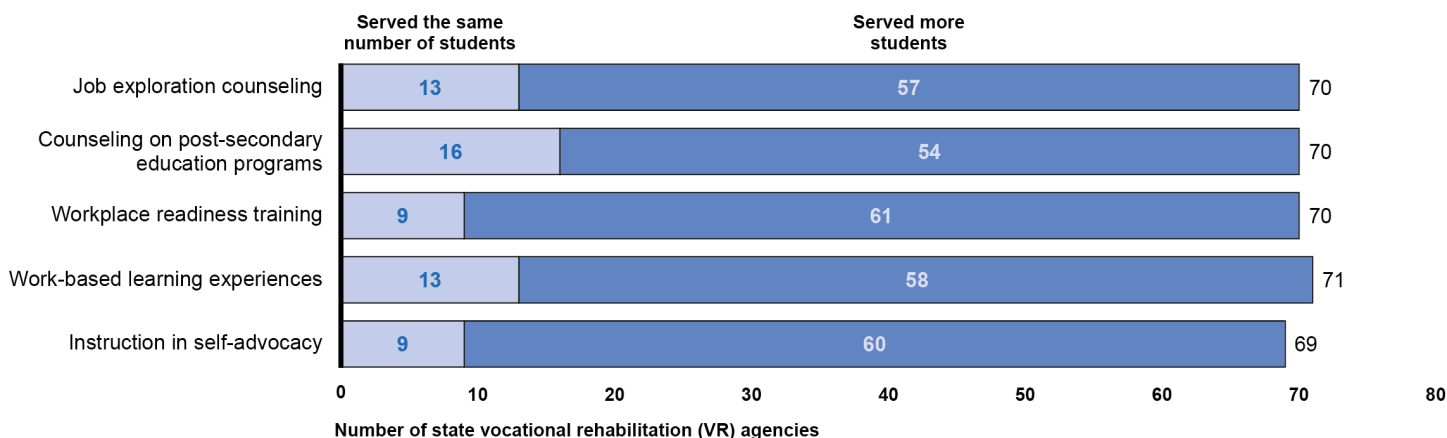
<sup>15</sup>During the monitoring visits, RSA also assesses the Supported Employment Services program, which makes grants to states to provide time-limited supported employment services for individuals (both youth and adults) with the most significant disabilities, with the goal of supporting competitive integrated employment.

## Most States Reported Expanding Their Transition Services to Students and Developing Their Administrative Capacity to Provide These Services

### Most State Vocational Rehabilitation Agencies Reported Expanding Their Services for Students with Disabilities

Most state VR agencies that responded to our survey reported expanding services for students with disabilities since WIOA's enactment in July 2014 by either serving more students through pre-employment transition services or by initiating new or additional services. Most state VR agencies that responded to our survey reported that they provided the five required activities to more students with disabilities since WIOA's enactment (see fig. 2).<sup>16</sup>

**Figure 2: Number of State Vocational Rehabilitation (VR) Agencies that Reported Increasing the Number of Students with Disabilities Receiving Services Since the Enactment of WIOA**



Source: GAO survey of state VR agencies. | GAO-18-502

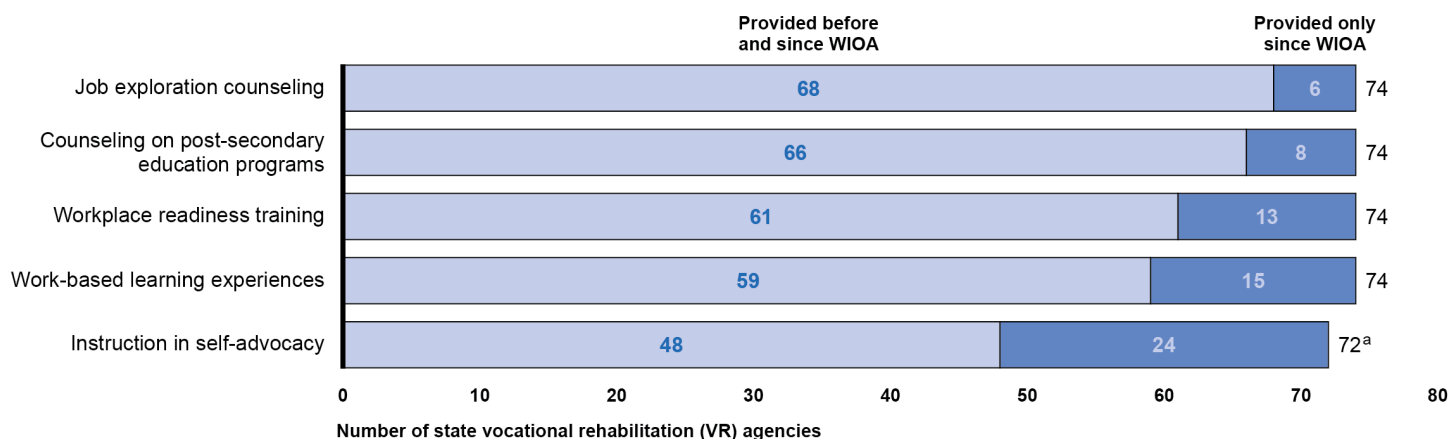
WIOA= Workforce Innovation and Opportunity Act

<sup>16</sup>According to Education officials, complete and reliable service provision data reported to Education were not available for the time of our review because Education just recently began collecting these data from states.

Note: In instances in which the totals do not sum to 74, the remainder either responded "don't know", "decreased", or did not answer the question. One agency that reported decreases in the number of students being provided an activity also reported that it raised the minimum age for students to receive services.

State VR agencies indicated in their survey responses that they had previously provided and continue to provide transition services to students who apply and are eligible for the VR program, and many of the activities were not entirely new to state VR agencies. Most agencies that responded to our survey reported providing each of the required activities to students with disabilities before the enactment of WIOA, while fewer reported initiating these services since enactment (see fig. 3).

**Figure 3: State Vocational Rehabilitation (VR) Agencies that Reported Providing the Five Required Pre-Employment Transition Services Activities for Students with Disabilities Before and Since the Enactment of WIOA**



Source: GAO survey of state VR agencies. | GAO-18-502

WIOA= Workforce Innovation and Opportunity Act

<sup>a</sup>Two GAO survey respondents reported that they did not provide this service.

Of the five required activities, instruction in self-advocacy saw the biggest expansion during this time. In information provided with the regulations, Education described instruction in self-advocacy as, for example, classroom lessons in which students learn about their rights, responsibilities, and how to request accommodations or services and supports needed during transition. In written comments on our survey, 10 state VR agencies reported partnering with other organizations, such as universities or centers for independent living, to provide instruction in self-advocacy. One agency reported on our survey that it offers peer mentoring as an additional component of self-advocacy services, and another reported providing self-advocacy and mentoring for deaf-blind students by deaf-blind adults. In October 2016, based on views of an expert panel that we convened on autism spectrum disorders and



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transitioning youth, we reported that it is critically important that all transitioning youth, regardless of their level of disability, be given the opportunity to state their own preferences to the extent of their capabilities to reach their maximum independence.<sup>17</sup>

State VR agencies reported developing additional programming as a result of WIOA's enactment, including expanding programs for more students, adding new opportunities and experiences, and creating new partnerships. Officials from all four of the state VR agencies we interviewed said they had programs in place prior to WIOA that offered activities similar to pre-employment transition services, but they have since expanded these services or created additional programs for students with disabilities. For example, an official we interviewed from the Idaho Division of Vocational Rehabilitation said the agency had previously worked to enroll students in the VR program prior to graduation, but has since begun developing new programming and instruction aimed at serving larger groups and providing other services, such as a paid work experience. An official from Maryland's Division of Rehabilitation Services said many of the services they previously offered were during school hours, and students had limited access to these services if they wanted to stay in class. The agency has since added services after school and during the summer, such as opportunities for students to meet with employers, according to Maryland officials. Officials from the Illinois Department of Human Services, Division of Rehabilitation Services, said that while the agency had previously provided work-based learning experiences, it has since expanded the number of spots available for students in an existing program and created a new work-based learning program that is a collaboration between school districts, a community rehabilitation partner, and businesses.

Providing new services with specific requirements to an expanded population has been a significant change, according to officials in one of the state VR agencies we interviewed and in all three of our discussion groups. For example, officials from Maryland's Division of Rehabilitation Services said that, while they provided all five required activities before WIOA, they now provide the activities to a younger population and make the activities available statewide. State VR officials in all three of our discussion groups said that providing pre-employment transition services

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<sup>17</sup>GAO, *Youth with Autism: Roundtable Views of Services Needed During the Transition into Adulthood*, [GAO-17-109](#) (Washington, D.C.: October 18, 2016).

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allows them to provide these services to more students with disabilities or at an earlier age, which will likely have positive effects on students' transition from school to work. For example, officials in one discussion group noted that the provision of pre-employment transition services is increasing awareness, enhancing services, and increasing the likelihood that VR program outcomes will improve. In another discussion group, officials said their agencies had already seen benefits from pre-employment transition services and the services have raised students' expectations for the types of jobs they might obtain.

While 32 of the state VR agencies responding to our survey reported that they had identified all potentially eligible students, another 37 reported that they were currently in the process of identifying these students.<sup>18</sup> State VR officials in all three of our discussion groups and who we interviewed in two of four state VR agencies said they have had challenges finding the population eligible for services. In written comments on our survey, one agency reported that while statewide information on students was not readily available, officials worked with the state educational agency to identify potentially eligible students, including more than 137,000 students with an IEP and an estimated 13,000 additional students that do not have an IEP. We previously reported on the difficulties state VR officials faced in obtaining data they could use to identify other youth with disabilities.<sup>19</sup>

Compared to combined and general agencies, more agencies for the blind reported in our survey that they did not provide the five required activities to more students with disabilities, and officials in some of these agencies said they can serve a much smaller population. For example, 57 percent (12 of 21) of agencies for the blind reported providing job exploration counseling to more students, compared to 83 percent (25 of 30) of combined agencies and 91 percent (20 of 22) of general agencies since WIOA enactment. Similarly, 67 percent (14 of 21) of agencies for the blind reported providing work-based learning experiences to more students, compared to 83 percent (25 of 30) for combined agencies and 86 percent (19 of 22) for general agencies.<sup>20</sup> Officials in some of these

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<sup>18</sup>Four state VR agencies responded to our survey that they had not yet identified all students and one responded "don't know."

<sup>19</sup>GAO, *Supplemental Security Income: SSA Could Strengthen Its Efforts to Encourage Employment for Transition-Age Youth*, [GAO-17-485](#) (Washington, D.C.: May 17, 2017).

<sup>20</sup>One general agency did not answer this survey question.

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agencies for the blind and from the National Council of State Agencies for the Blind (NCSAB) told us in interviews that agencies for the blind have far fewer potentially eligible students they could serve compared to other types of agencies. For example, officials we interviewed with Idaho's Commission for the Blind and Visually Impaired said that Idaho has only 40 students being provided pre-employment transition services. In contrast, the Idaho Division of Vocational Rehabilitation reportedly provided at least one pre-employment transition service to approximately 700 students in a one-year period.

The ability of agencies for the blind to serve more students may also be restricted because they are not able to provide pre-employment transition services to younger students in some cases, according to officials with NCSAB and Idaho's Commission for the Blind and Visually Impaired. NCSAB officials told us that state VR agencies have traditionally provided VR services to youth who are blind or visually impaired at younger ages compared to general agencies that serve youth with other types of disabilities. The ages at which students may be provided pre-employment transition services varied by agency, based on responses to our survey, but the most common age range reported across all types of agencies was 14 to 21 years old. According to Education officials, as a result of WIOA, two agencies in the same state must agree on a common age range during which students can be provided pre-employment transition services. Most agencies in states with two VR agencies responding to our survey (35 of 44) reported agreeing on an age range for receiving pre-employment transition services.<sup>21</sup> NCSAB officials said that in some cases agencies for the blind have had to raise the minimum age at which they would begin providing services to students. Officials with Idaho's Commission for the Blind and Visually Impaired, for example, said they would prefer to begin services at younger ages because their agency has the resources to do so. However, officials with Idaho's Division of Vocational Rehabilitation said they do not have the resources to provide pre-employment transition services to the relatively large number of students with disabilities at a younger age.

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<sup>21</sup>Of the respondents from agencies in states with two agencies, 6 of 44 reported that the agreement was in-progress. Three of 44 reported that they had not agreed. In four of the states we surveyed (8 agencies), the 2 agencies in the same state reported differently on whether they had agreed, an agreement was in-progress, or they had not agreed on an age range with the other VR agency.

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## Most State Vocational Rehabilitation Agencies Reported Building Administrative Capacity

State VR agencies reported taking a range of actions to build their administrative capacity to implement pre-employment transition services. These actions included building staff capacity and expanding contracts with services providers.

- **Building staff capacity.** Most state VR agencies reported building staff capacity to facilitate and carry out the requirements of pre-employment transition services by:
  - *Establishing a new specialist position.* More than half (45 of 74) of VR agencies reported in our survey establishing at least one new transition specialist position specifically for pre-employment transition services. For example, the Idaho Division of Vocational Rehabilitation reported establishing this position and officials told us that they hired a specialist who was previously the transition coordinator for the state's educational agency. In written comments on our survey, a respondent from another state commented that their agency has hired 20 pre-employment transition services specialists to provide the five required activities. Officials we interviewed from Maryland's Division of Rehabilitation Services said they added six salaried positions dedicated to providing pre-employment transition services. Another agency responding to our survey reported dedicating a supervisor and 15 percent of their counselors exclusively to this purpose.
  - *Training staff.* All 74 state VR agencies reported providing training on pre-employment transition services to their staff. For example, in written comments, one agency reported developing training tools for its counselors, such as answers to frequently asked questions, posting guidance on its intranet, and having WINTAC provide training.
- **Expanding contracts and agreements with service providers.** In addition to being provided by state VR agency staff, pre-employment services can be offered through a variety of methods and service providers, and many state VR agencies reported entering into new or additional contracts with service providers or expanding contracts with existing providers. Pre-employment transition services can be provided directly by state VR agency staff or through agreements with third parties, such as community rehabilitation programs, independent living agencies, public colleges and universities, and school districts.<sup>22</sup> In our survey, 62 of 74 agencies reported entering into new or

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<sup>22</sup>See 29 U.S.C. § 733(a).

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additional contracts with third-party providers to provide pre-employment transition services. Officials we interviewed from three of four state VR agencies said they either established or expanded existing contracts and agreements. For example, officials from the Illinois Department of Human Service, Division of Rehabilitation Services told us that after the enactment of WIOA, they expanded arrangements with independent living centers and initiated a new program that provides students with work experiences.

Agencies reported several examples of approaches using third parties:

- establishing contracts with community rehabilitation programs to provide work experiences,
- partnering with independent living agencies to work with youth on self-advocacy,
- entering into provider agreements with local workforce centers to assist with providing job preparation and a paid work experience,
- developing programs with public colleges and universities focused on financial literacy and self-advocacy, and
- contracting with individual school districts to deliver services in the school environment.

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States Reported Challenges Using Reserved Funds, Updating Interagency Agreements, Among Others, and Reported Needing More Assistance from Education



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agencies responding to our survey reported using the minimum required 15 percent of federal VR grant funds reserved for the provision of pre-employment transition services for fiscal years 2016 and 2017.<sup>23</sup> For fiscal year 2015, 25 agencies reported using the required 15 percent minimum reserved funds.<sup>24</sup>

Officials we interviewed in two of four state VR agencies and officials in all three discussion groups explained that some of the services they generally provided to participants in the VR program are not allowable for the funds reserved for pre-employment transition services. These expenditures included transportation, tuition, and others associated with individualized services. For example, officials in Maryland's Division of Rehabilitation Services told us that transportation costs for students to get to the place where the services are provided are not covered. VR agency officials in two of our discussion groups told us that assistive technology, such as hearing aids, could not be paid for with the 15 percent of funds reserved for pre-employment transition services. In another group, participants said that some expenditures, such as tuition or for the services of a job coach to help students with the most significant disabilities, could not be paid with reserved funds. In information provided with the regulations, Education stated that it does not have the statutory authority to allow these expenditures to be paid for with the funds reserved for pre-employment transition services and these services must be paid with other VR funds.

When it promulgated its final regulations, Education noted that state VR agencies would experience challenges in using their funds because many of the services provided to students with disabilities prior to WIOA's enactment would not qualify as pre-employment transition services. Education reviewed past expenditures for a subset of students and estimated that 82 percent of state VR agencies' reported purchases for those students would not meet the statutory definition of pre-employment

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<sup>23</sup>We did not assess states' compliance with WIOA or Education's funding requirements with our analysis. States may expend some of these funds in the next fiscal year, as they are allowed to carry over funds awarded in a fiscal year for which they have provided a nonfederal match to the subsequent fiscal year to be obligated and expended in that subsequent year. Moreover, Education noted that states with two VR agencies may still meet the requirement to reserve and expend funds if their combined expenses meet or exceed the 15 percent requirement.

<sup>24</sup>Those who reported spending the 15 percent minimum requirement of their VR grant included all types of agencies (combined, general, and blind).

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services under WIOA. Education concluded that states would have to reach a larger number of students with disabilities in order to meet the spending requirement and that state VR agencies would need to develop and implement aggressive strategies to expend these funds in these initial years of implementation.

According to WINTAC officials, state VR agency officials are commonly unclear about what kinds of activities they can provide using the funds reserved for pre-employment transition services. For instance, they said that states must make required activities (e.g. work-based learning experiences and self-advocacy) available to all students with disabilities before providing authorized activities (e.g. model projects, partnerships), in accordance with WIOA. However, state officials have commonly interpreted that to mean that all students must actually receive the required activities before the agency can begin providing other activities, according to WINTAC officials. WINTAC officials explained that states may have been conducting authorized or coordination activities without knowing these activities could be paid for with the reserved funds.

None of the state VR agency officials we interviewed said they had yet moved beyond providing required activities to providing authorized activities. Officials from two of the agencies we interviewed told us they were in the process of planning authorized activities. For example, officials with the Idaho Division of Vocational Rehabilitation said they were completing an assessment of their needs, which would help them plan authorized activities. Officials we interviewed from the other two agencies—the Idaho Commission for the Blind and Visually Impaired and the Illinois Division of Rehabilitation Services—said they did not have the resources to provide authorized activities or were unsure about how to properly transition from required to authorized activities under the current guidance.

Education communicated with states on broad requirements but provided little detailed information directly to states on the allowable use of funds reserved for pre-employment transition services. Education provided information when it promulgated final regulations, in grant award notifications, on its website, and in presentations at conferences. In each of these formats, Education described activities on which states could not spend funds, but provided little detailed information on what expenditures are allowed.

- **Regulations:** Education’s final regulations restate many provisions in WIOA, including the prohibition on using any of the reserved funds for



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administrative costs. In responding to comments it received on its proposed regulations, Education provided examples of services that commenters requested would be considered pre-employment transition services, such as, postsecondary education, on-the-job supports, job coaching, travel expenses, and uniforms. In information provided with the regulations, Education explained that it had no statutory authority to expand or limit the pre-employment transition services listed in WIOA. Education stated that a state VR agency can allocate costs associated with staff time spent providing pre-employment transition services, including an employee's salary and fringe benefits, to the funds reserved for pre-employment transition services.<sup>25</sup> However, Education did not provide additional information on what specific types of expenditures states were permitted to spend funds on in providing pre-employment transition services as required by WIOA.

- **Grant award notification:** The notification that accompanies each state's VR grant award lists the three sets of activities for which the reserved money can be used: required, authorized, and coordination; it lists each of the activities as they are listed in WIOA. It also discusses the prohibition on using any of the reserved funds for administrative costs. It does not list or describe what specific expenditures the reserved funds can be used for to undertake each of the listed activities.
- **Education's website:** A list of frequently asked questions on Education's website outlines the requirements of WIOA and explains that the reserved funds must only be used to provide pre-employment transition services as listed in WIOA. Similar to the regulations, the website explains that the total costs of an employee's salary and fringe benefits may be allocated to the reserved funds if that employee is providing only pre-employment transition services to students with disabilities but does not include additional detail for any other expenditures.
- **Presentation materials:** In one set of presentation materials, Education provided an example of a potential allowable expenditure for one of the required activities, work-based learning. It did not include information on allowable expenditures for the other four required activities, or any of the nine authorized activities. In another

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<sup>25</sup>In promulgating final regulations, Education noted that it has been its long-standing policy that staff-related costs, including salaries, fringe benefits, and travel, incurred while providing vocational rehabilitation services constitute service costs, not administrative costs. See 81 Fed. Reg. 55,630, 55,702 (Aug. 19, 2016).

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set of presentation materials, Education provided examples of services for each of the five required pre-employment transition services activities. According to Education officials, these examples would be allowable expenditures.

Education, however, provided the most detailed information through WINTAC. WINTAC's website provided answers to some specific questions on the use of funds reserved for pre-employment transition services. In one set of frequently asked questions, WINTAC included a list of 28 questions with detailed answers, including what specific expenditures may be charged to the reserved funds. For example, based upon guidance issued by RSA, the website explains that reserved funds may be used to pay for auxiliary aids and services, such as interpreters, if they are directly related to one of the five required pre-employment transition services activities. However, the reserved funds may not be used to pay for the costs of foreign language interpreters because they are not an auxiliary aid or serve that is required due to the individual's disability. WINTAC's website also included answers provided by Education on 13 other frequently asked questions. Information included that reserved funds cannot be used to pay for the cost of an assessment to determine whether a student met the definition of a student with a disability; they can be used to pay for items required by an employer for work-based learning activities.

Some state VR agencies we surveyed and those that participated in one of our three discussion groups said they would like more detailed information directly from Education. Seven survey respondents reported that they would like Education to provide answers to their specific questions. In one discussion group, participants noted that when states approach WINTAC with a new question, the technical assistance center sometimes needs to obtain the answer from Education. This process can be inefficient at times. In addition, the answer may not be broadly shared with all the states, limiting its benefit, whereas information issued directly from Education could help communicate the answer more efficiently and broadly. One survey respondent reported, for example, that guidance varied by source—training, Education's RSA staff, or technical assistance center websites—and said that Education should provide all state VR agencies with the same information at the same time.

According to standards for federal internal control, management should communicate externally through reporting lines so that external parties

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can help the entity achieve its objectives and address related risks.<sup>26</sup> Management should also periodically evaluate its methods of communication so it has the appropriate tools to communicate quality information throughout and outside of the entity on a timely basis.<sup>27</sup> Education officials said that during fiscal years 2015 and 2016, states were unclear about allowable expenditures using reserved funds, and that they plan to clarify guidance as they learn about the issues from states during their monitoring. According to Education officials, they respond to issues that need clarification and provide answers to questions as part of formal monitoring visits or through other communications with state agencies. Education officials said they expect to complete a round of monitoring visits to all states by the end of fiscal year 2021. However, an Education official said they have no timeframe for providing further information on allowable costs to states. With better information on timeframes for when this information will be provided, states would be able to better plan their use of the remaining funds reserved for pre-employment transition services.

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### State VR and Educational Agencies Have Begun Collaborating through Joint Training and Guidance, But Fewer Than Half Have Updated Their Interagency Agreements

Most state VR agencies (61 of 74) that responded to our survey reported providing training on pre-employment transition services along with their state's educational agency since WIOA's enactment in 2014. Joint training may help coordination between state VR and educational agencies, as state VR officials participating in our discussion groups said that some educators were not familiar with pre-employment transition services. Similarly, an official we interviewed from Idaho's state educational agency said it was common in the past for teachers and VR counselors not to know one another. Joint trainings provided to VR staff and teachers have improved these relationships, and teachers can invite VR counselors to students' IEP meetings, the official said.

Joint training includes staff presentations at conferences and participation in other training sessions. For example, officials we interviewed from the Idaho Division of Vocational Rehabilitation said their transition coordinator has given presentations to education directors around the state about changes resulting from WIOA and how the inclusion of pre-employment transition services can affect special education for the school districts. In

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<sup>26</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014), 62.

<sup>27</sup>[GAO-14-704G](#), 63.

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written comments on our survey, one agency reported that it co-sponsors an annual conference with VR, special education, developmental services, and other public and private entities. During this conference, they plan how to improve services for students with disabilities.

About one-third of state VR agencies (23 of 74) reported issuing joint guidance with their state's educational agency, a recommended practice according to WINTAC. The other two-thirds of survey respondents reported that joint guidance was either in progress (27 of 74) or that they had not issued such guidance (23 of 74).<sup>28</sup> Joint guidance can include written policies and procedures that are created by and provided to state VR and educational agency staff. For example, in written comments on our survey, one agency reported developing written policies and guidance for transition counselors that the state educational agency endorses and provides to special education staff. In Maryland, VR and special education officials told us that they issued guidance through jointly created materials on pre-employment transition services.

Less than half the state VR agencies that responded to our survey (34 of 74) reported updating their interagency agreement with their state's educational agency, which is intended to facilitate collaboration and coordination on delivery of pre-employment transition services. The majority of agencies reported that their agreement is either in progress (37 of 74) or not yet updated (3 of 74). These required agreements outline how VR agencies and schools will plan and coordinate service provision, provide for each agency's responsibilities, including financial responsibilities, and provide for student outreach procedures, among other things.<sup>29</sup>

Discussion group participants and CSAVR representatives emphasized the value of completing their interagency agreements with the state educational agency. In one group, officials whose agencies had completed their agreements said they are essential for state VR agencies to provide services in schools. Participants in another discussion group explained that once they have a state-level agreement in place, they can discuss what services school districts need for students and then determine how to provide those services. According to state educational agency officials we interviewed, Individuals with Disabilities Education Act

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<sup>28</sup>One survey respondent did not answer the question.

<sup>29</sup>See 29 U.S.C. § 721(a)(11)(D).

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(IDEA) requirements are similar to requirements for pre-employment transition services, and they need to coordinate with VR officials at both the state and local levels to agree on each agency's assigned tasks and expectations. These officials said state VR and educational agencies should coordinate funding to make services available where they are needed and to complement each other's transition efforts. Illinois's agreement, for example, specifies that the state educational agency is responsible for providing outreach, guidance, and coordination to local educational agencies regarding the provision of pre-employment transition services. According to the agreement, Illinois's VR agency is responsible for providing pre-employment transition services, both directly and through cooperative agreements with local educational agencies, and for providing written information to the state educational agency regarding services available to students with disabilities. Officials we interviewed with CSAVR said state VR agencies that have made progress in developing their interagency agreements with state educational agencies tend to be more successful in implementing pre-employment transition services.

According to Education officials, Education provides guidance and technical assistance on interagency agreements to states as part of Education's monitoring or when asked by states. Education officials said they provide technical assistance during periodic monitoring visits, which are currently limited to about 10 states per year from fiscal years 2017-2021; by helping state VR agencies develop policies and procedures; and by making sure pre-employment transition services are coordinated with the state educational agency and through interagency agreements. According to Education officials, there is no statutory provision authorizing Education to identify states that have not updated their interagency agreement. Education officials said they do not collect information from state VR agencies on the status of these agreements except when they conduct monitoring visits in specific states. In addition, Education officials said that when monitoring, they may meet with state educational agency partners to help them understand the new components of pre-employment transition services in an agreement, or they may refer the state agencies to WINTAC or NTACT resources. Providing assistance during monitoring may be helpful for some states. However, given that less than half of state VR agencies we surveyed reported updating and finalizing their agreements and Education officials say they will take another three years to complete this round of monitoring, additional action by Education may be needed to raise awareness among the remaining states about the importance of these agreements to help states coordinate services to students with disabilities. Additional action could

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include, for example, conducting earlier state outreach or monitoring to assess state progress on finalizing the interagency agreements and offering technical assistance when appropriate.

However, Education officials said there is no requirement that state educational agencies provide pre-employment transition services to meet their obligations to IDEA-eligible students with disabilities under part B of the Individuals with Disabilities Education Act.<sup>30</sup> As a result, WINTAC and participants in our discussion groups explained that it can be difficult to get state educational agencies to work with state VR agencies to update interagency agreements. Education officials said that WIOA requires state VR agencies to update these interagency agreements to include pre-employment transition services but they do not track their completion because states are not required to report when the agreements are finalized. Moreover, Education officials said they have heard from states that some reasons that interagency agreements are not specifically updated are that the agreements are written broadly enough so that they can remain in effect when there are additional changes to the law, the details of actual practices are rarely reflected in the high level of an interagency agreement, and that modifications to agreements are time-consuming and would not result in changes to the interagency coordination practice.

Without an updated agreement between the state VR and educational agencies, efforts to collaborate on pre-employment transition services may be hindered. Officials with the National Technical Assistance Center on Transition (NTACT) told us that some of the state agencies for which they provided in-depth technical assistance were not working closely together. Officials from two of the three state educational agencies we interviewed said they viewed pre-employment transition services as primarily the responsibility of the VR agency. State VR officials in all three of our discussion groups said they have experienced coordination challenges, including difficulty determining each agency's responsibilities for providing pre-employment transition services, obtaining data needed to identify and provide services to students, and determining which agency will pay for which services, among other challenges. Interagency agreements can help to address these types of issues.

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<sup>30</sup>The Individuals with Disabilities Education Act (IDEA) does not include language pertaining to pre-employment transition services.

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Federal internal controls recommend that management communicate with and obtain information to identify, analyze, and respond to risks related to achieving defined objectives, such as those that can arise from new laws and regulations.<sup>31</sup> Moreover, we found in prior work that it is important to establish ways to operate across agency boundaries, with measures such as developing common terminology and fostering open lines of communication.<sup>32</sup> A lack of collaboration between state VR and educational agencies increases the risk that some students will not successfully transition from school to post-school activities. In addition, our prior work has identified lack of collaboration among and between federal agencies and state and local governments as a challenge to effective grant implementation.<sup>33</sup> Interagency agreements are intended to serve as a mechanism related to collaboration practices, which include defining a common outcome, establishing joint strategies, and agreeing on roles and responsibilities of each agency. By taking additional steps, such as discussing the benefits of finalizing interagency agreements, and reminding states of existing technical assistance resources pertaining to updating and finalizing interagency agreements, Education would help raise awareness about the importance of the agreements and be better positioned to help states efficiently and effectively coordinate services to students with disabilities.

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### States Reported That Best Practices Would Be Useful to Them in Implementing Services and Could Help Them Address Challenges

Most state VR agencies (63 of 74) that responded to our survey reported that additional assistance with identifying best practices would be useful to their agencies.<sup>34</sup> Similarly, state VR officials in all three of our discussion groups spoke to the need for Education to develop and disseminate best practices to help states, for example, comply with program requirements. WIOA requires Education to highlight best state practices on pre-employment transition services.<sup>35</sup> Best practices may

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<sup>31</sup>GAO-14-704G, 62.

<sup>32</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, GAO-12-1022 (Washington, D.C.: September 27, 2012).

<sup>33</sup>GAO, *Grants to State and Local Governments: An Overview of Federal Funding Levels and Selected Challenges*, GAO-12-1016 (Washington, D.C.: September 25, 2012).

<sup>34</sup>Seven survey respondents answered “no,” three answered “don’t know,” and one did not answer this question.

<sup>35</sup>See 29 U.S.C. § 733(e) (“The Secretary shall support designated State agencies providing services under this section, highlight best State practices, and consult with other Federal agencies to advance the goals of this section.”)

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also help states address the challenges they reported facing in implementing and administering pre-employment transition services for students with disabilities, such as (1) coordinating with state educational agencies, (2) using VR resources more efficiently and effectively to help states balance providing pre-employment services with the full VR program, and (3) collecting data on services provided, and (4) updating data tracking systems.

- **Coordinating service delivery with state educational agencies.** Over half (41 of 74) of state VR agencies reported in our survey that additional assistance on coordinating with state educational agencies would be useful for them.<sup>36</sup> Similarly, officials from all three state educational agencies we interviewed said they would like additional assistance on interagency collaboration. Officials with NTACTION told us that some of the state agencies for which they provided in-depth technical assistance were not working closely together. Officials from two of the three state educational agencies we interviewed said they viewed pre-employment transition services as primarily the responsibility of the VR agency. State VR officials in all three of our discussion groups said they have experienced coordination challenges, including difficulty determining each agency’s responsibilities for providing pre-employment transition services, obtaining data needed to identify and provide services to students, and determining which agency will pay for which services, among other challenges. An official we interviewed from the Idaho Department of Education said it would be helpful to have more clearly defined roles, obligations, and means of sharing data between the state-level agencies. In written responses to our survey, one respondent said having examples of highly successful collaborations between a state educational agency and state VR agencies would be helpful. According to Education’s guidance, a student’s transition from school to post-school activities is a shared responsibility and coordination and collaboration between the state VR and educational agencies is essential. However, according to information Education provided with the regulations, while some have sought clarification and additional guidance in this area, Education determined that decisions on agencies’ responsibilities must be made at the state level to allow states maximum flexibility allowed under the law. In the absence of more specific guidelines for how state agencies should

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<sup>36</sup>The remaining state VR agencies reported in our survey that additional assistance on coordinating with state educational agencies would not be useful (28 of 74), “don’t know” (4 of 74), or did not answer this question (1 of 74).



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collaborate, best practices from other states could provide helpful examples.

- **Balancing pre-employment transition services with VR services.** Several state VR agencies in both our written survey responses and in discussion groups noted that by increasing services mandated for pre-employment transition services for students, they have had to reduce VR services to adults, which has made it difficult to balance the two programs. In issuing its final regulations, Education acknowledged that reserving funds would decrease amounts available for the full VR program, resulting in a transfer of benefits from individuals historically served by VR to students with disabilities in need of transition services. According to state VR directors with the National Council of State Agencies for the Blind (NCSAB), agencies for the blind have had to restrict VR services while also not being able to use all of the funds reserved for pre-employment transition services for students with disabilities because VR services cannot be paid with reserved funds. Most state VR agencies that completed our survey (50 of 74) reported that balancing pre-employment transition services with other vocational rehabilitation services was moderately difficult, very difficult, or extremely difficult during federal fiscal year 2017.<sup>37</sup>
- **Collecting data.** Data collection was one of the top challenges identified by state VR agencies in our survey, with 48 of 74 reporting that collecting data on the provision of pre-employment transition services was moderately difficult, very difficult, or extremely difficult during fiscal year 2017. Prior to WIOA, agencies collected and reported data only on individuals who had applied and enrolled in the VR program. For pre-employment transition services, agencies now collect data on who provided and received each of the five required activities, including for individuals who have not submitted a VR application. State VR officials in two of our three discussion groups said that they have experienced challenges collecting sensitive information (such as social security numbers) for minors and collecting data on individuals for group services. Officials in one of the three discussion groups also said that these problems are particularly significant when trying to collect information on potentially eligible students for whom they do not have open VR cases. These students could include all those with an IEP and those that receive accommodations in school based on their disability, among others.

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<sup>37</sup>The remaining state VR agencies reported in our survey that balancing pre-employment transition services with other vocational rehabilitation services was slightly difficult (20 of 74), not at all difficult (3 of 74), or “don’t know” (1 of 74).

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- **Updating data tracking systems.** Updating data systems was also one of the top challenges reported in our survey, and was cited as an additional administrative burden by state VR officials in our discussion groups. Specifically, 53 of 74 state VR agencies reported that it was moderately difficult, very difficult, or extremely difficult to update tracking systems to collect and report financial and service data on pre-employment transition services during fiscal year 2017. According to a state VR agency official we interviewed, updating that state's tracking system is difficult because data collected on pre-employment transition services—such as the type of service provider and how the service was provided—do not fit well into a case management system designed for the full VR program. Updating these tracking systems also created an additional administrative burden for VR agency staff, according to officials from all three discussion groups and three of the four state agencies that we interviewed. Officials in two of our three discussion groups said that they have one or more full-time staff members doing only administrative tasks or that they have had to hire additional staff to handle data tracking.

Education officials said that they plan to document and share best practices with states; however, they said the agency does not have a final written plan for managing these efforts because plans are still under discussion in light of inquiries received. Education officials said they are collecting information on state VR agencies' practices through monitoring and they are sharing this information with WINTAC—information that could be useful for sharing best practices across states—but a comprehensive summary of states' efforts will not be available until after Education officials conduct monitoring visits of all states by the end of fiscal year 2021. In addition, in a 2015 technical assistance circular, Education recommended that state VR agencies consult with other federal, state, and local agencies to identify best practices for providing pre-employment transition services to students and youth with a variety of disabilities. Education officials also said that they are looking for opportunities, such as webinars and conferences, to share information with states. However, Education does not have set timeframes and has not detailed the specific steps and activities for fully leveraging knowledge to address common challenges, or for finalizing and disseminating best practices. By doing so, Education would be better positioned to provide best practices information to state VR agencies to better serve students with disabilities who are transitioning from high school.

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## Conclusions

Pre-employment transition services are designed to help students with disabilities begin to identify career interests and move from high school to

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post-secondary education or employment. Using federal funding, state VR agencies reported that they have generally enhanced their services and staff capacity and begun to coordinate with state educational agencies. As a result, state VR agencies generally reported serving an increased number of students. However, most states reported they have not used all the funds reserved for pre-employment transition services or updated interagency agreements between state VR and educational agencies. Education has developed multiple forms of guidance and made presentations, either directly or through its technical assistance centers. Education officials said they plan to issue additional guidance as needed. However, without clear timeframes for the issuance of this guidance, states do not know when information will become available to help them make decisions on allowable expenditures for pre-employment transition services. As a result, opportunities may be missed to identify and serve all students who might be eligible, and unserved students could continue to face difficulties preparing for a future of meaningful post-secondary education or employment. In addition, agreements between state VR and educational agencies can help facilitate the effective coordination of and financial responsibility for services. Finally, WIOA requires Education to highlight best state practices for implementing pre-employment transition services. Developing a written plan with specific timeframes would help Education provide states with information on best practices, such as balancing service delivery between pre-employment transition services and other VR services and collecting data that other states may have successfully addressed.

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## Recommendations for Executive Action

We are making the following three recommendations to Education:

The Secretary of Education should establish timeframes for providing states with additional information on allowable expenditures of funds reserved for pre-employment transition services. (Recommendation 1)

The Secretary of Education should take additional steps to provide states assistance on updating and finalizing their interagency agreements with state educational agencies to include pre-employment transition services. These steps could include, for example, accelerating their efforts to discuss the benefits of finalizing interagency agreements, and reminding states of existing technical assistance resources pertaining to updating and finalizing interagency agreements. (Recommendation 2)

The Secretary of Education should develop a written plan with specific timeframes and activities for identifying and disseminating best practices

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that address, as appropriate, implementation challenges for pre-employment transition services, such as those identified in this report. (Recommendation 3)

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## Agency Comments and Our Evaluation

We provided a draft of this report to Education for review and comment. Education's written comments are reproduced in appendix III. Education also provided technical comments, which we incorporated into our report where appropriate.

Education concurred with recommendation 1 and disagreed with recommendations 2 and 3 in the draft report.

With regard to recommendation 1, Education stated that it agreed and will establish projected timeframes for providing states with additional information on allowable expenditures for the provision of pre-employment transition services. Education also stated that it intends to provide states with additional information in at least two forums before the end of calendar year 2018 and to review and analyze previous guidance provided to states on allowable expenditures.

With regard to the draft report's recommendation 2, which called for Education to identify states that have not updated and finalized their interagency agreements to include pre-employment transition services, Education stated that it disagreed, in large part, because there is no statutory provision authorizing the agency to identify such states. However, Education is taking some steps as part of its ongoing monitoring of the VR program to provide assistance to states that have not updated their interagency agreements, which is consistent with the intention of our recommendation, but more could be done. Education stated that it will continue to offer and provide technical assistance if it becomes known through the onsite monitoring of the VR program or through other means that states have not updated their interagency agreements between VR agencies and state educational agencies. It also noted that the Rehabilitation Services Administration (RSA) and its Office of Special Education Programs will provide information related to sources of technical assistance, as appropriate, to VR agencies and state educational agencies. While these steps may be helpful, given the number of states that have not updated and finalized their agreements and the length of time Education officials say they will take to complete this round of monitoring where Education asks state VR agencies about these agreements, additional action by Education may be needed to help

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states more efficiently and effectively coordinate services to students with disabilities.

Education also wrote that while the Rehabilitation Act requires an interagency agreement, the Individuals with Disabilities Education Act does not contain a parallel requirement for state and local educational agencies with respect to the provision of pre-employment transition services or the incorporation of such discussion into the interagency agreement. In light of these differing requirements, as we state in our report, stakeholders with whom we spoke indicated it can be difficult to get state educational agencies to work with state VR agencies to update interagency agreements. Therefore, it is all the more important for Education to take additional action to engage with VR agencies regarding interagency agreements and to work closely with VR agencies as Education becomes aware of states that have not updated their agreements.

Education suggested a modified recommendation that removed reference to Education identifying states that have not updated and finalized their agreements. We modified the recommendation and the report to address Education's concerns about its authority to identify states. By taking additional steps, such as discussing the benefits of finalizing interagency agreements, and reminding states of existing technical assistance resources pertaining to updating and finalizing interagency agreements, Education would help raise awareness about the importance of the interagency agreements and be better positioned to help states efficiently and effectively coordinate services to students with disabilities.

With regard to recommendation 3, Education stated that it disagreed because it is premature to develop a timeline for the dissemination of best practices. Education stated that the identification of "best" practices, meaning those that are clearly supported by a body of evidence derived from valid and reliable research findings, is still emerging as states implement the requirements. Education suggested a modified recommendation that included planning for the dissemination of best practices identified by states as they become available. Education stated in its comments that as RSA identifies best practices through its monitoring and technical assistance activities, it will, in collaboration with its Office of Special Education Programs, consider when and how best to disseminate this information to state VR and educational agencies. With regard to including specific timeframes and activities in a written plan, by detailing the specific steps Education is taking and plans to take along with the amount of time it expects them to take, Education would be

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better positioned to complete those steps in a timely manner and meet the statutory requirement that Education highlight best state practices and support state agencies.

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As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees and the Secretary of Education. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact Elizabeth H. Curda at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

Sincerely yours,



Elizabeth H. Curda  
Director, Education, Workforce  
and Income Security

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# Appendix I: Objectives, Scope, and Methodology

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The objectives of this report are to examine (1) the steps states have reported taking to implement pre-employment transition services, and (2) the implementation challenges, if any, states reported facing, and how the Department of Education (Education) has addressed them.

To address these objectives, we reviewed federal laws and regulations, and Education's guidance and technical assistance documents, including circulars, policy directives, and transition guides. We also reviewed expenditure data reported by state vocational rehabilitation (VR) agencies to Education for fiscal years 2015 and 2016, the most recent full years of data available. To assess the reliability of the data, we interviewed Education officials about their collection of the data and their opinion of the data's quality, completeness, and accuracy. We also electronically tested the data for any obvious errors. We determined that the data were reliable for the purposes of our review. We interviewed representatives from the Council of State Administrators of Vocational Rehabilitation (CSAVR) and the National Council of State Agencies for the Blind. In addition, we interviewed officials from Education's Office of Special Education and Rehabilitation Services, Rehabilitation Services Administration, Office of Special Education Programs, and the Workforce Innovation Technical Assistance Center and National Technical Assistance Center on Transition—two technical assistance centers funded by Education.

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## Survey of State Vocational Rehabilitation (VR) Agencies

To address both of the objectives, we conducted a survey of all 79 state VR agencies from October through December 2017. Seventy-four of the 79 agencies (94 percent) responded. The survey questionnaire included open-ended and closed-ended questions about agencies' efforts to train staff, update interagency agreements, expand services to students with disabilities, and other issues. We took steps to minimize the potential errors that may be introduced by the practical difficulties of conducting any survey. Because we selected the entire population of VR agencies for our survey, our estimates are not subject to sampling error. We conducted pretests of the draft questionnaire with three agencies in the population and made revisions to reduce the possibility of measurement error from differences in how questions were interpreted and the sources of information available to respondents.

We reviewed state officials' submitted survey responses and conducted follow-up, as necessary, to determine that their responses were complete, reasonable, and sufficiently reliable for the purposes of this report. A second independent analyst checked the accuracy of all computer

analyses we performed to minimize the likelihood of errors in data processing. We made multiple follow-up attempts during the survey with agencies that had not yet responded. The five agencies that did not respond had smaller values, on average, on three characteristics related to size, than those that did respond.<sup>1</sup> The nonrespondents tended to be smaller than respondent agencies. The sums totals for each of these three characteristics across the five nonresponding agencies comprised less than 1 percent of the totals for the population, suggesting a lower possibility of material error in our results from nonresponse.<sup>2</sup>

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## Interviews and Discussion Groups with State VR Agencies

For more in-depth information on both of the objectives, we conducted interviews and held discussion groups. We conducted interviews with officials in Idaho, Illinois, and Maryland. For each state, we interviewed state VR officials and state educational agency officials. We selected these states for variety using the following criteria: size of the special education population (large, medium, and small); state agency organization, for example, whether the VR agency was organized under the state's educational or other department; and whether the state had a second agency for serving individuals who are blind or visually impaired.<sup>3</sup>

We convened three discussion groups with state VR agency directors or their designated officials, with a total of 39 participants from 29 separate agencies (10 to 12 agencies represented per discussion group). These discussion groups took place during a conference of state VR directors in November 2017 in Greenville, South Carolina. To select participants, we worked with the conference organizer, CSAVR, to send invitations for our discussion groups to all conference attendees. We additionally included a

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<sup>1</sup>These three characteristics were: eligible service populations, numbers served, and grant totals. The nonresponding agencies did not materially differ from responding agencies across the fourth known characteristic—the percentage of their state populations in urban areas. These characteristics may or may not be related to the nature of agency answers to some survey questions.

<sup>2</sup>Nonresponse error can result when a survey fails to capture information from all cases sampled, or in this case, the population. Nonresponse reduces the precision of estimates due to the smaller number of observations, and may introduce bias if those not responding, in the aggregate, would have given materially different answers to a question compared to those who did respond.

<sup>3</sup>Using data from Education on the number of individuals ages 12-21 receiving special education and related services in each state, we determined 30,000 and fewer individuals to be “small”; between 30,000 and 100,000 to be “medium”; and 100,000 or more to be “large.”



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question in our survey asking respondents whether they would like to participate in discussion groups at the conference, and contacted those who responded affirmatively via phone and email. We moderated each discussion to keep participants focused on the specified issues within discussion timeframes.

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## Criteria Applied

To assess Education's efforts to address state VR agencies' challenges in providing pre-employment transition services, we applied standards for internal control in the federal government.<sup>4</sup> Specifically, we applied principle 15 related to communicating with external parties.<sup>5</sup> In addition, regarding Education's assistance to state VR agencies' efforts to update interagency agreements with state educational agencies, we also applied key considerations for implementing interagency collaborative mechanisms that we have previously identified.<sup>6</sup>

We conducted this performance audit from February 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>4</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>5</sup>[GAO-14-704G](#), 62-63.

<sup>6</sup>GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: September 27, 2012).

# Appendix II: WIOA Authorized Activities for Pre-employment Transition Services

**Table 2: The Nine Authorized Pre-employment Transition Services Activities Under the Workforce Innovation and Opportunity Act (WIOA)**

Activity	Description
Independence and inclusion	Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces.
Strategy development	Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently, participate in postsecondary education experiences, and obtain and retain competitive integrated employment.
Service provider instruction	Providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities.
Information dissemination	Disseminating information about innovative, effective, and efficient approaches to achieve the goals of pre-employment transition services.
Local coordination	Coordinating activities with transition services provided by local educational agencies under the Individuals with Disabilities Education Act.
Evidence-based improvements	Applying evidence-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to better achieve the goals of pre-employment transition services.
Model projects	Developing model transition demonstration projects.
Partnerships	Establishing or supporting multistate or regional partnerships involving states, local education agencies, designated state units, developmental disability agencies, private businesses, or other participants to achieve the goals of pre-employment transition services.
Traditionally unserved populations	Disseminating information and strategies to improve the transition to postsecondary activities by individuals who are members of traditionally unserved populations.

Source: WIOA | GAO-18-502

# Appendix III: Comments from the United States Department of Education



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

THE ASSISTANT SECRETARY

August 9, 2018

Elizabeth H. Curda  
Director  
Education, Workforce and  
Income Security Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Curda:

I am writing in response to the recommendations made in the U.S. Government Accountability Office (GAO) draft report, "Students With Disabilities: Additional Information From Education Could Help States Provide Pre-Employment Transition Services" (GAO-18-502). We appreciate the opportunity to comment on the draft report on behalf of the U.S. Department of Education (Department).

Over the past several decades the provision of transition services has been, and continues to be, a shared responsibility between State educational agencies (SEA) and State vocational rehabilitation (VR) agencies in each State.

Section 614(d)(1)(A)(i)(VIII) of the Individuals with Disabilities Education Act (IDEA) requires that the individualized education program (IEP) for each eligible student must address transition services requirements beginning not later than the first IEP to be in effect when the student turns 16, or younger if determined appropriate by the IEP Team, and must be updated annually thereafter. To meet IDEA's transition services requirements, the IEP must contain the instruction, services, and supports needed to assist the student to gain the skills and experiences necessary to reach his or her desired post-school goals to facilitate the student's movement from school to post-school activities. The Rehabilitation Act of 1973 (Rehabilitation Act) authorizes a continuum of services, such as pre-employment transition services, transition services, job placement services, other VR services, and supported employment services for eligible students and youth with disabilities, as appropriate, to secure meaningful careers. Each VR agency is required to describe in the VR services portion of its Unified or Combined State Plan its plans, policies, and procedures for the coordination between VR and education officials to facilitate the transition of students with disabilities from the receipt of educational services in school to the receipt of VR services, including pre-employment transition services. The IDEA does not include the concept of pre-employment transition services.

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

The draft report includes three recommendations to the Department. Our responses follow.

**Recommendation 1:** *The Secretary of Education should establish timeframes for providing states with additional information on allowable expenditures for use of funds reserved for pre-employment transition services.*

**Response:** The Department agrees with the Recommendation and will establish projected timeframes for providing States with additional information, as appropriate, that would describe the requirements, along with flexibilities available to the States when expending funds reserved for the provision of pre-employment transition services to students with disabilities under the VR program. As part of this effort, and already planned, given the needs expressed by States, the Department intends to provide States with additional information in at least two forums before the end of calendar year 2018. In addition, the Department intends to review and analyze previous guidance provided to States on allowable expenditures to determine what further clarification might be helpful to assist States in meeting statutory requirements related to the expenditure of funds reserved for the provision of pre-employment transition services.

**Recommendation 2:** *The Secretary of Education should identify states that have not updated and finalized their interagency agreements with state educational agencies to include pre-employment transition services and direct them to available technical assistance resources.*

**Response:** The Department disagrees, in large part, with the Recommendation given that there is no statutory provision authorizing the Department to identify those States that have not yet updated their interagency agreements with State educational agencies to incorporate a discussion of the provision of pre-employment transition services under the VR program. We recommend that the Recommendation be modified accordingly to read as follows:

*The Secretary of Education should offer assistance to States that may benefit from assistance in updating and finalizing their interagency agreements with state educational agencies to include pre-employment transition services and advise them of available technical assistance resources.*

The Department will continue to offer and provide technical assistance if it becomes known through the Rehabilitation Services Administration's (RSA) onsite monitoring of the VR program or through other means that States have not updated their interagency agreements between VR agencies and State educational agencies to discuss the provision of pre-employment transition services as required by section 101(a)(11)(D) of the Rehabilitation Act. RSA and the Office of Special Education Programs (OSEP) will also provide information related to sources of technical assistance, as appropriate, to VR agencies and SEAs. While the Rehabilitation Act requires an interagency agreement, it is important to note that the IDEA does not contain a parallel requirement for State and local educational agencies with respect to the provision of pre-employment transition services or the incorporation of such discussion into the interagency agreement. Section 612(a)(12) of the IDEA does require an interagency agreement or other mechanism for interagency coordination to ensure that services needed to ensure a free appropriate public education (FAPE), including transition services as defined in section 602(34) of the IDEA, are provided.

**Recommendation 3:** *The Secretary of Education should develop a written plan with specific time frames and activities for identifying and disseminating best practices that address, as appropriate, implementation challenges, such as those identified in this report.*

**Response:** The Department disagrees with this Recommendation as drafted because it is premature to develop a timeline for the dissemination of best practices. The implementation of the requirements for pre-employment transition services is an iterative process involving changes in two large service systems, VR and special education. Implementation challenges and some delays are to be expected. The provision of pre-employment transition services to students with disabilities involves a substantial reconfiguration of spending and delivery of services by VR agencies. Identification of “best” practices, meaning those that are clearly supported by a body of evidence derived from valid and reliable research findings, is still emerging as states implement the requirements. Thus, we recommend that the Recommendation be modified accordingly to read as follows:

*The Secretary of Education should develop a written plan for disseminating best practices identified by States that address the delivery of pre-employment transition services as they become available, and include, as appropriate, State strategies for addressing implementation challenges, such as those identified in this report.*

As RSA identifies best practices through its monitoring and technical assistance activities, it will, in collaboration with OSEP, consider when and how best to disseminate this information to State VR and educational agencies.

The Department appreciates the opportunity to review the draft report and comment on the recommendations. We also are enclosing technical comments for your consideration.

Sincerely,



Johnny W. Collett

Enclosure

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Elizabeth H. Curda, (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov).

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## Staff Acknowledgments

In addition to the contact named above, Sara Schibanoff Kelly (Assistant Director), Paul Schearf (Analyst-In-Charge), Matthew Rabe, and Paul Wright made key contributions to this report. Also contributing to this report were James Bennett, Kristy Kennedy, Sheila R. McCoy, Thomas James, Jessica Orr, Sam Portnow, Carl Ramirez, Monica Savoy, Kate Van Gelder, Adam Wendel, and James Whitcomb.

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# Related GAO Products

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*Workforce Innovation and Opportunity Act: States and Local Areas Report Progress in Meeting Youth Program Requirements.* [GAO-18-475](#). Washington, D.C.: June 15, 2018.

*Supplemental Security Income: SSA Could Strengthen Its Efforts to Encourage Employment for Transition-Age Youth.* [GAO-17-485](#). Washington, D.C.: May 17, 2017.

*Youth with Autism: Federal Agencies Should Take Additional Action to Support Transition-Age Youth.* [GAO-17-352](#). Washington, D.C.: May 4, 2017.

*Youth with Autism: Roundtable Views of Services Needed During the Transition into Adulthood.* [GAO-17-109](#). Washington, D.C.: October 18, 2016.

*Students with Disabilities: Better Federal Coordination Could Lessen Challenges in the Transition from High School.* [GAO-12-594](#). Washington, D.C.: July 12, 2012.

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