

Understanding Financial Responsibilities in Service Delivery: *Supplementing, not Supplanting*

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Presenters

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Objectives

Understand the difference between “supplementing” and “supplanting” of transition services for students

Identify the criteria to determine VR and LEA responsibilities delivering Pre-ETS

Discuss Florida’s process for developing the LEA Agreement, and initiatives for implementation

Rehabilitation Act, as Amended by WIOA

Intent of Pre-ETS Legislation

- ❖ **Improve** the transition of students with disabilities from school to postsecondary education or to an employment outcome.
- ❖ **Increase opportunities** for students with disabilities to practice and improve workplace readiness skills, through work-based learning experiences in competitive, integrated work settings.
- ❖ **Increase opportunities** for students with disabilities to explore post-secondary training options, leading to more industry recognized credentials, and meaningful post-secondary employment.

361.22(b) Formal Interagency Agreement

The State's formal interagency agreement lays the foundation and provides the basis for determining which agency pays for certain services.

Section 113 of the Rehabilitation Act, as amended by WIOA, requires VR to provide or arrange for the provision of pre-employment transition services in collaboration with local educational agencies.

Decisions as to who will be responsible for providing services that are both special education services and vocational rehabilitation services must be made at the State and/or local level as part of this collaborative process and will be further defined in the formal interagency agreement.

361.22 (c) Coordination with education officials

(c) Construction. Nothing in this part *[under Title 1 of the Rehabilitation Act]* will be construed to reduce the obligation under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) of a local educational agency or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to children with disabilities within the State involved.

Implementation

“Success Depends on Relationships and Relationships Depend on Communication”

- Stakeholder “Buy In”

Effective Communication

- Secure Relationships

Successful Collaboration

Stakeholder “Buy In”

1003.5716 (Florida Statutes)

Pre-ETS shall be provided to an individual with disabilities between 14 and 21 years of age Individual Educational Plan (IEP) or 504

When the division receives documentation that an individual meets the conditions, the division must provide:

- Pre-ETS within a reasonable period of time not to exceed 90 days after the date that it receives an individual’s consent (or for a minor, legal guardian’s consent), to receive services, unless unforeseen circumstances beyond the control of the division prevent the division from providing services within the 90-day timeframe and all parties the individual agree to an extension of time.

Section 413.301 (Florida Statutes)

To ensure quality planning for a successful transition of a student with a disability to postsecondary education and career opportunities, during the student’s seventh grade year or when the student attains the age of 12, whichever occurs first, an IEP team **shall begin the process of, and develop an IEP for, identifying the need for transition services** before the student with a disability enters high school or attains the age of 14 years, whichever occurs first, in order for his or her postsecondary goals and career goals to be identified.

The plan must be operational and in place to begin implementation on the first day of the student’s first year in high school.

State Level Stakeholders

Florida Dept. of Education's Internal Inter-Agency Council

- ❖ Bureau of Exceptional Education
- ❖ Division of VR – Transition Program
- ❖ Division of VR - Independent Living
- ❖ Division of Blind Services – Transition
- ❖ Division of Career and Adult Education

Components of Florida's (VR General and VR Blind) LEA Agreement Template – Local Level

- ❑ Defining Roles of Partners (Supplementing vs Supplanting)
- ❑ Transition Planning and Coordination (Mapping Services)
- ❑ Outreach and Collaboration
- ❑ Technical assistance & consultation
- ❑ Grievance procedures / conflict resolution
- ❑ Other Consideration: Section 511
- ❑ Partners Contact Administrators

Supplement vs Supplant - *Definition*

Supplement



- “To build upon” or “add to”
- Ensure federal grant funds are expended to benefit the intended population defined in the authorizing statute
- VR funds reserved for pre-employment transition services at the state or local level should either **enhance current services or create new services** for students

Supplant



- “To replace” or “take the place of”
- Federal funds are diverted to cover expenses that the LEA would have paid out of other funds in the event the federal funds were not available
- VR pre-employment transition service funds **should not** be used for expenses that are the responsibility of the school

Criteria To Determine Partner's Responsibility

Purpose of the Service...	Customary Service...	Eligibility...
<p>1. Is the purpose of the service related to an employment outcome?</p>	<p>1. Is the service one customarily provided under IDEA or the Rehabilitation Act?</p>	<p>1. Is the student with a disability eligible for special education or related services under IDEA?</p>
<p>If the answer is yes, it is the programmatic responsibility of DVR.</p>	<p>If the answer is yes, then it is either the LEA or VR that is responsible for providing the service, whoever customarily provides the service.</p>	<p>If yes, transition services provided under an IEP with IDEA funds may be considered comparable services for Pre-ETS; although it cannot be reported as such in the RSA 911. In this case it is the responsibility of the LEA.</p>
<p>2. Is the purpose of the service related to educational attainment?</p>	<p>2. Will the service enhance transition services available under IDEA?</p>	<p>2. Does the student have a 504 plan and/or are they an individual with a disability, for the purposes of section 504 of the Rehabilitation Act?</p>
<p>If the answer is yes, it is the programmatic responsibility of LEA.</p>	<p>If yes, then VR and the LEA must collaborate and coordinate the provision of such services. A conversation between each partner should take place to identify financial and programmatic responsibility of each partner.</p>	<p>If yes, it is the responsibility of VR to provide Pre-ETS. The population of students with disabilities served by the VR program is broader than that under IDEA because it includes students with disabilities under section 504 of the Act. IDEA does not cover SWD on a 504 plan.</p>

We Don't Have To...We Get To



Map out services to determine IDEA transition services that are currently being provided by the LEA, and new/enhanced services VR can provide



Discuss the sequence of these services



Determine the individual needs of the student (i.e. attend IEP meetings, etc.)



Coordinate goals and objectives in the IEP with student's projected post-school employment outcome and Pre-ETS services in the IPE

Determine what Pre-ETS the student needs

Example - Mapping Sequence of Services

_____ High School/VR Team

Current Pre-Employment Transition Services

Gr.	Job Exploration Counseling	Work-Based Learning Experiences	Counseling on Post-Secondary Programs	Workplace Readiness Training	Instruction in Self-Advocacy
	EDUCATION				
9					
	VOCATIONAL REHABILITATION				
	EDUCATION				
10					
	VOCATIONAL REHABILITATION				
	EDUCATION				

Examples – Self-Advocacy Crosswalk

Pre-ETS (Vocational Rehabilitation)

Assist students in learning about their rights, responsibilities, and becoming self-aware

Helping students learn about their disability and accommodation needs

Educate students on available accommodations, including how to request accommodations, services, and supports

Provide instruction to support student involvement in IPE development

Develop leadership skills

IDEA Transition Services (Local Education Agency)

Involve students in completing age-appropriate transition assessments in multiple areas (e.g., independent living, self-determination)

Develop post-school goals aligned with transition assessment data (this may inform the identification of self-advocacy needs)

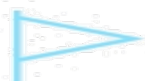
Seek input from parents, students, and other IEP team members, related to post-school goals and transition planning

Provide instruction on student led IEPs

Provide instruction to support student involvement in transition planning, including research opportunities to identify what is needed to reach post-school goals

Involve students in completing the Summary of Performance as a tool to access to services post-school, and instruction as to how the SOP can be presented by students to employers.

Vocational Rehabilitation Journey Map- Pre-Employment Transition Services:



1. Who do we serve:

Pre-Employment Transition Services (Pre-ETS) are available to students ages 14-21 who have an IEP or 504 plan, or other documented disability.

1



2. Requirements:

In order to participate in Pre-ETS students do not need to be determined eligible. The only documentation that is needed to move forward is a copy of the student's IEP or 504 plan. If a student does not have an IEP or 504 plan, a letter from a school representative will suffice.

2



4. Process

A school representative will submit the referral via the STAR Portal, as well as a copy of the IEP or 504 plan (release forms will be provided to local school districts for these documents to be released).

4

5. Process (cont.)

The student will be assigned to a VR Staff member who will manage the case. The VR Staff member's contact information will be provided to you at the first initial interaction.

Introduction letters/appointment letters will be sent directly to the student's home. When received, please reach out to the VR Staff Member as soon as possible so that an appointment can be scheduled. These can be virtual through Microsoft Teams or Face to Face.



3. Responsibilities:

In order for this process to be successful; open communication is a MUST. At the beginning of the process, waiver forms must be filled out prior to any services being provided. Please ensure you are responding to phone calls, emails, and letters being sent home.

5



6. Process (cont.)

The VR Staff Member will be reviewing all of the Pre-ETS services with you and your student, as well as provide you with a listing of all the providers we work with in our local school districts that offers these services. Through informed choice, you and your student will choose which provider to work with for each service. Once the providers are chosen, the VR Staff Member will reach out to the providers to schedule the appointments.

6



9. When does Pre-ETS end:

As your student is closer to graduation and wishes to apply for our VR Traditional Program, they are able to apply. Pre-ETS services will end when student turns 22, however they can still receive services as an adult after they turn 22.

9



8. When do services occur:

Typically these services will take place after school hours, on weekends, or during school holidays/Summer breaks.

8



7. Pre-ETS services:

- Job Exploration Counseling:
- Post-secondary Educational Counseling:
- Workplace Readiness Training:
- Work-based Learning Experiences:
- Self-Advocacy Training:

(VR Staff will provide the student with a copy of our Pre-ETS flyer that describes each of these services in detail).

7

Florida's Electronic Student Referral Process



WR Division of Vocational Rehabilitation
Florida Department of Education
HOME | ABOUT US | PROGRAMS | CUSTOMERS | EMPLOYERS | VENDORS | FL REHAB COUNCIL

Programs

- Transition Youth
- VR Career Camp
- Transition Resources
- Transition FAQs
- STAR Program
- STAR Training
- Self-Advocacy Training
- Youth Peer Mentoring
- Deaf, Hard of Hearing, and Deaf-Blind Services
- Deaf Resource Links
- Supported Employment
- Ticket to Work
- Independent Living Program
- IL Background Screening
- IL Technical Assistance and Training
- IL Partners
- VR Training

STAR PROGRAM

STAR Program Introduction Video
For students with disabilities who are 14-21 years old

STAR Overview 7

Watch later Share



Under the Workforce Innovation and Opportunity Act (WIOA), Pre-Employment Transition Services must be offered to students with disabilities without requiring them to apply for, or be determined eligible for, these services.

WIOA established VR as the primary agency for preparing youth with disabilities for employment while the youth are still in high school, including being able to access services while pursuing postsecondary education (trade, college, or university). VR will deliver specific Pre-Employment Transition Services including:

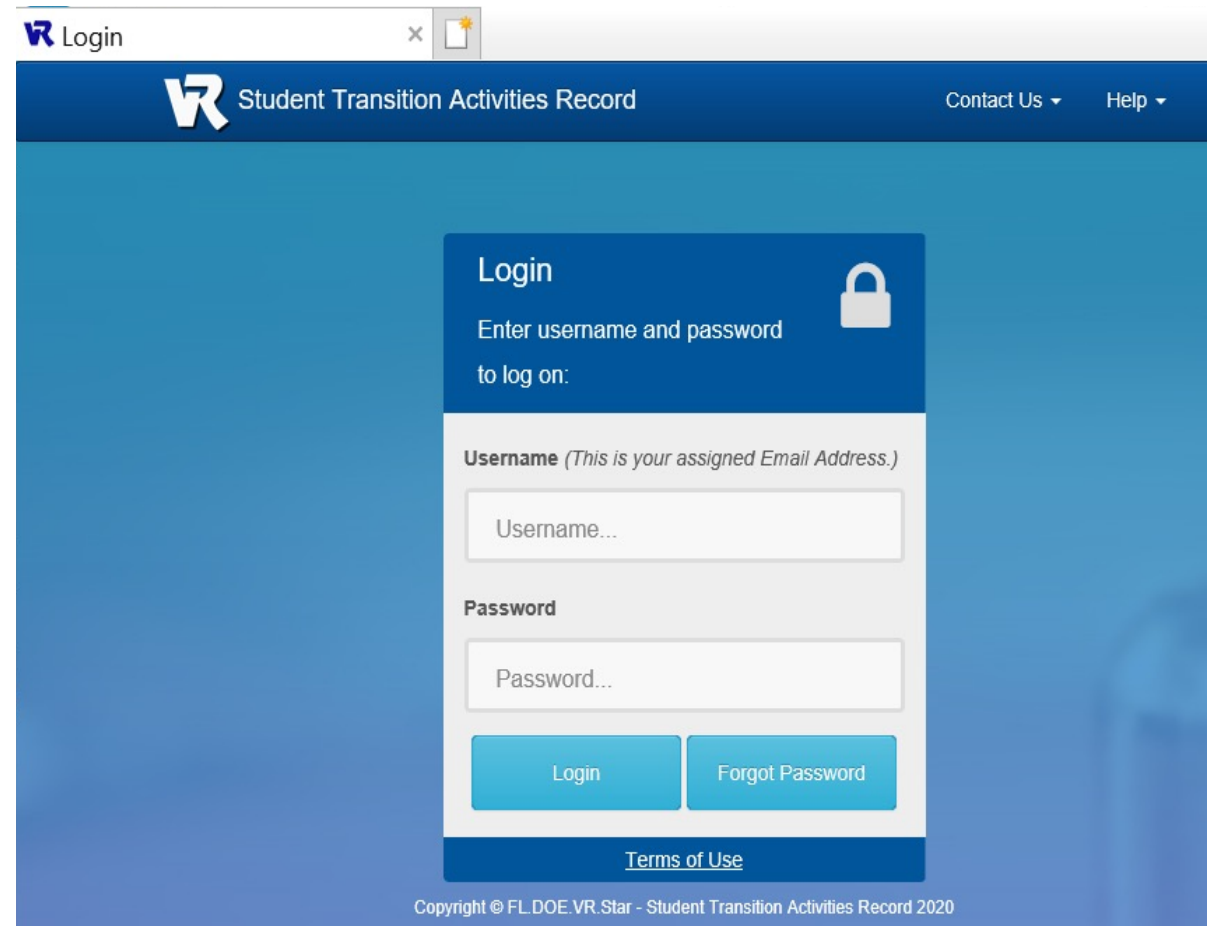
- Career Exploration Counseling
- Work Readiness Training
- Self-Advocacy Training
- Postsecondary Educational Counseling
- Community-Based Work Experiences

The students are not traditional VR customers, but have been referred to VR by school districts for limited (pre-employment transition) services.

VR Office Directory

Google Custc

www.RehabWorks.org/stw_star.shtml



WR Login

Student Transition Activities Record

Contact Us Help

Login

Enter username and password to log on:

Username (This is your assigned Email Address.)

Password

Login Forgot Password

[Terms of Use](#)

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www.Star.RehabWorks.org



STAR Services

* Denotes required field.



1. Home

2. Student

3. Student/School

4. Accommodation

5. Services

6. Confirmations

Student Information Continued

* School

District

School District F

* Title

* First Name

* Last Name

- ALACHUA
- BAKER
- BAY
- BRADFORD
- BREVARD
- BROWARD
- CALHOUN
- CHARLOTTE
- CITRUS
- CLAY
- COLLIER
- COLUMBIA
- DADE
- DEAF/BLIND
- DEPARTMENT OF JUVENILE JUSTICE
- DESOTO
- DIXIE
- DUVAL
- EMPLOYER / TRAINING PROVIDER PROGRAM

* Student's School

* Phone #

Phone Ext.

- A. CRAWFORD MOSLEY HIGH SCHOOL
- BAY HAVEN CHARTER MIDDLE SCHOOL
- BAY HIGH SCHOOL
- BAY REG. JUVENILE DETENTION CTR
- BAY VIRTUAL FRANCHISE
- BAY VIRTUAL INSTRUCTION (COURSE OFFERINGS)
- BREAKFAST POINT ACADEMY
- C C WASHINGTON ACADEMY
- CENTRAL HIGH SCHOOL (BAY, School#782)
- CHAUTAUQUA CHARTER SCHOOL
- DEANE BOZEMAN SCHOOL
- EVERITT MIDDLE SCHOOL
- EXCEPTIONAL STUDENT EDUCATION
- Gulf Coast State College
- HOME EDUC PROGRAM STUDENTS (BAY, School#9998)
- J.R. ARNOLD HIGH SCHOOL
- JINKS MIDDLE SCHOOL
- Kaleidoscope School Of Discovery
- MARGARET K. LEWIS IN MILLVILLE
- MERRITT BROWN MIDDLE SCHOOL

Previous Next



Account Management

Manage the registered user accounts:



Users: 3

Register User

Name	School	Email	Phone #	Edit	Delete
Mr. Vicente Perez		perezv@gm.sbac.edu	(352) 955-7671 Ext.1625		
Mrs. Debra L Lindsey-DJJ	ALACHUA ACADEMY	debra.lindsey@sequelyouthservices.com	(352) 955-7893		
Ms. Carmen Rosa	AMIKIDS (ALACHUA, School#603)	carmen.rosasilva@vr.fldoe.org	(352) 225-4849		

School District: ALACHUA

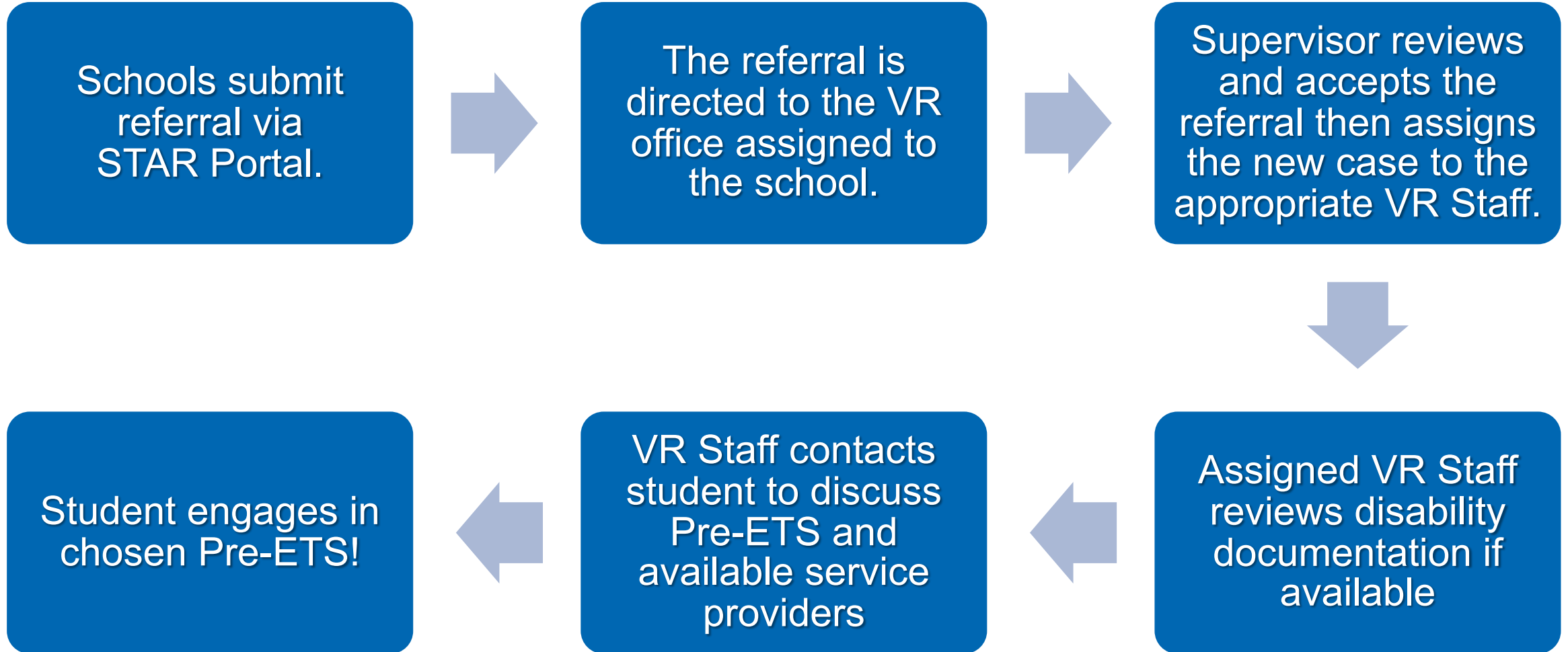
STAR Referral Submissions: 465

New Referral

10 ▾

Student Name	Student Phone #	Contact Name	Referral Status	Case Status	Submitted	Documents
[REDACTED]	[REDACTED]	Vicente Perez	Duplicate Referral	Not a STAR Case	4/30/2017, 5:00:17 PM	
[REDACTED]	[REDACTED]	Vicente Perez	Accepted	Youth - Closed, Eligible and receiving VR services	4/30/2017, 5:10:38 PM	
[REDACTED]	[REDACTED]	Vicente Perez	Accepted	Youth - Closed, Eligible and receiving VR services	4/30/2017, 5:15:35 PM	
[REDACTED]	[REDACTED]	Vicente Perez	Accepted	Youth - Closed, Unable to locate or contact	4/30/2017, 5:20:16 PM	
[REDACTED]	[REDACTED]	Vicente Perez	Duplicate Referral	Not a STAR Case	4/30/2017, 5:24:58 PM	

VR Approval Process



How Do You Address Supplementing vs Supplanting When the School is the Pre-ETS Provider?



Contact Info

“Success Depends on Relationships and Relationships Depend on Communication”

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<https://www.rehabworks.org/stw.shtml>

Thank You and Enjoy the Rest of the CBVI!

Find us on:  

#transitionTA | transitionTA.org | ntact-collab@uncc.edu



Office of Special Education Programs
U.S. Department of Education

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