

Time Allocation Guide for Pre-Employment Transition Services

The federal regulations require all staff time spent providing and arranging pre-employment transition services for students with disabilities (SWD) to be tracked and reported. The following information is provided for the purpose of guiding **(insert VR State Agency name here)** staff in tracking and reporting time spent in relation to pre-employment transition services.

Staff time for the purpose of this guide pertains to those individuals employed by **(insert VR State Agency name)** who either directly provide or arrange for the provision of the required pre-employment transition services or engage in one or more of the 4 coordination activities. Additionally, if funds remain for the agency to use one or more of the 9 authorized pre-employment transition services, VR staff time may be charged to the funds reserved when coordinating or arranging for those services. *[Note: VR agencies are not permitted to pay any administrative costs, as defined in section 7(1) of the Rehabilitation Act and §361.5(c)(2)], such as the salaries for the VR counselor's clerical assistant or supervisor, with the funds reserved for the provision of pre-employment transition services.]*

- Pre-employment transition services fall into three categories: **required, coordination and authorized**. Time spent **arranging for and providing required activities, coordination services and authorized activities** for students with disabilities, age **(insert VR State Agency age range for a student with a disability here)**, are allowable costs that can be charged to the 15% minimum reserve for pre-employment transition services.
- Time spent arranging for and providing **auxiliary aids and services for potentially eligible or eligible students with sensory and communicative disorders** who need such aids and services to access or participate in pre-employment transition services, are allowable costs that may be charged to the reserve funds for pre-employment transition services.
- Time spent **arranging for and providing other VR services in support of pre-employment transition services for students with disabilities who are eligible for VR, in accordance with an approved IPE**, and need such services to benefit from one or more of the five required pre-employment transition services are also allowable costs that may be charged to the reserve funds for pre-employment transition services.

- Please see **(insert state Agency name)** policies and procedures for additional written guidance and internal controls regarding staff time charging and documentation requirements for the following pre-employment transition services **(insert link to your state’s appropriate policy/procedure here)**.

1. Direct Services/Required Activities (34 CFR 361.48(a)(2)):

a. The five “required” activities of pre-employment transition services are:

1. Job exploration counseling;
2. Work-based learning experiences, which may include in-school, after school, or community-based opportunities;
3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at IHEs;
4. Workplace readiness training to develop social skills and independent living; and
5. Instruction in self-advocacy, including peer mentoring.

b. Tracking staff time for directly providing or arranging for the provision of one or more of the five required pre-employment transition services activities directly toward the required activities may include:

- Staff time spent directly providing the required pre-employment transition service activities. *[Note: The specific pre-employment transition services the student receives are documented in the student’s case record, through the agency’s case management system; however, staff time is typically tracked and reported through the counselor’s timesheet or agency time/attendance system.]*
- Staff travel time.
- Staff time spent arranging for the provision of pre-employment transition services, including casework and documentation. [See FAQ on Staff Time Charging](#)
- Staff time spent working with the student and providers to identify and arrange the pre-employment transition service(s) that best meet the student’s needs.
- Staff time spent arranging and coordinating any auxiliary aids and services that a student with a sensory or communicative impairment may need in order to participate in one or more of the

required pre-employment transition services.

- Staff time spent arranging and coordinating any additional VR services that may be needed in order for an eligible student with a disability to participate in one or more of the required pre-employment transition services as outlined in the Notice Of Interpretation (NOI) guidance issued on [February of 2020](#) and additional in [March of 2022](#). See item #4 below for further details.
- **Example A:** If the counselor is providing job exploration counseling off site from 1:00-2:00 pm and they left the VR office at 12:30 to travel to the site and returned at 2:30 from providing the service, then they would document 2 hours of staff time providing pre-employment transition services. *[Note: If the counselor spent an additional hour meeting with this student or another student to discuss any other VR service (see #4 below for details on any exceptions), that additional time **cannot** be counted as pre-employment transition services time.]*
- **Example B:** If the counselor spent an hour researching providers and coordinating availability of pre-employment transition services for the student, the counselor would then document 1 hour of staff time arranging for the provision of pre-employment transition services.
- **Example C:** If the counselor spent two hours researching screen reader software programs for blind/visually impaired students or arranging for interpreter services for deaf/HH students in order for the SWD to participate in a work-based learning experience, the counselor would document 2 hours of staff time arranging for the provision of auxiliary aids and services for the SWD receiving required Pre-ETS services

*[Note: Personal devices and services to include individually prescribed assistive technology or devices such as prescription eyeglasses or hearing aids, etc. **are not** allowable costs to be charged to the reserve funds, and therefore any staff time spent on arranging or coordinating these services may not be charged to pre-employment transition services reserve funds.]*

2. Coordination Activities (34 CFR 361.48(a)(4)):

a. The four pre-employment transition “coordination” activities are:

1. Attending individualized education program meetings for students with disabilities, when invited;
2. Working with the local workforce development boards, one-stop centers, and employers to

develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;

3. Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
4. When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

b. Tracking staff time for directly carrying out or participating in any of the coordination activities that are essential for providing and arranging pre-employment transition services may include:

- Staff time spent participating in, or arranging for any of the coordination activities, which may also include their travel time to and from the provision of coordination activities.
- **Example A:** If the counselor attended an IEP meeting from 9:00 am to 12 noon, the counselor could document 3 hours of staff time as a pre-employment transition service coordination activity. *[Note: If the counselor was at the high school until 1 pm discussing other students receiving additional VR services not in support of one or more of the five required pre-employment transition services, staff would not be able to charge that additional hour to pre-employment transition services.]*
- **Example B:** If the counselor spent two hours providing consultation to parents, school staff, businesses and agencies regarding pre-employment transition services, OR two hours attending parent/teacher conferences to provide consultation to parents/teachers regarding pre-employment transition services, the counselor could document 2 hours of staff time as a pre-employment transition services coordination activity.

3. Authorized Activities (34 CFR 361.48(a)(3)):

- a. **The authorized activities are those pre-employment transition services that may be provided only *after* a state has determined sufficient funds remain available to provide the required and coordination activities.**

Select one of the following statements:

- (Insert state agency name)** is not currently tracking staff time toward any of the authorized activities, OR
- (Insert state agency name)** is currently providing the following authorized activities: **(customize by selecting only those activities from the list below that your agency is currently providing)**
 - implement effective strategies that increase independent living and inclusion in their communities and competitive integrated workplaces;
 - develop and improve strategies for individuals with intellectual and significant disabilities to live independently, participate in postsecondary education experiences, and obtain and retain competitive integrated employment;
 - provide training to vocational rehabilitation counselors, school transition staff, and others supporting students with disabilities;
 - disseminate information on innovative, effective, and efficient approaches to implement pre-employment transition services;
 - coordinate activities with transition services provided by local educational agencies under IDEA;
 - apply evidence-based findings to improve policy, procedure, practice, and the preparation of personnel;
 - develop model transition demonstration projects;
 - establish or support multistate or regional partnerships that involve States, local educational agencies, designated State units, developmental disability agencies, private businesses, or others; and
 - disseminate information and strategies to improve the transition to postsecondary activities of those who are traditionally unserved.

b. Tracking staff time for authorized activities which are not direct services to students, but support the arrangement or provision of the direct required pre-employment transition services include:

- Staff document time spent participating in, or arranging for any of the agency approved **(specify which)** authorized activities, which may also include their travel time to and from the provision of or participation in authorized activities.

- **Example:** Staff will track the time spent preparing and providing staff training to VR and ED staff on supporting students with disabilities. Counselor X spent 5 hours preparing for and conducting this training workshop for local education agency staff about students with disabilities on self-advocacy and independent living, including financial literacy. The counselor's time to develop the materials can be reported as an “authorized” activity, for pre-employment transition services. *[Note: Clerical time may not be charged to provision of pre-employment transition services because their time meets the definition of “administrative costs” which is not an allowable charge to pre-employment transition services.]*

4. Other VR Services (34 CFR 361.48(b)):

a. As per the Notice Of Interpretation (NOI) guidance issued on [February of 2020](#) and additional in [March of 2022](#), other VR services under 34 CFR 361.48(b) that fall within the nature, scope, and purpose of pre-employment transition services when needed by an eligible student with a disability, in accordance with an approved Individualized Plan for Employment (IPE), are allocable to the funds reserved under 34 CFR 361.65(a)(3)(i), and may include the following:

- Assessment services;
- Counseling and Guidance
- Referral
- Rehabilitation Teaching/Orientation and Mobility services;
- Rehabilitation Technology;
- Transportation;
- Maintenance;
- Personal Assistance Services (PCA);
- Family services (e.g., transportation for family to attend a pre-employment transition services event);
- Coaching services (e.g., job coaching to participate in a work-based learning experience)

b. Tracking staff time for directly providing or arranging any of the other VR services that are needed by an eligible student with a disability, in accordance with an approved IPE to benefit from one of more of the required pre-employment transition services may include:

- Staff will document time spent directly providing or arranging for any of the other VR services that fall within the nature scope and purpose of pre-employment transition services, which may also include their travel time to and from the provision of other VR services.

*[Note #1: A student with a disability must be eligible, receiving services in accordance with an Individualized Plan for Employment (IPE), **and** require one or more of other VR services to participate in pre-employment transition services to be considered allowable costs and staff time charged to the pre-employment transition services reserve funds.]*

[Note #2: Documentation in the student's case record, must clearly support the student's need for other VR Services as outlined in the NOI, to benefit from one or more required pre-employment transition services to be considered allowable costs and staff time charged to the pre-employment transition services reserve funds.]

- **Example A:** If the counselor spent an hour meeting with the student to discuss their need for and participation in a work based learning experience, another 30 minutes discussing the additional services the student may need in order to participate, including transportation and coaching services, and then another 30 minutes discussing the options for transportation and coaching services and coordinating such services with a vendor or provider; the counselor would document a total of 2 hours as time spent providing or arranging for that required pre-employment transition service.

In accordance with 2 C.F.R. 200.302(7)(b) and 361.50, Agencies must have written processes, including a process to review procedures to determine if they are working, detailing the allocation of staff time to the reservation requirement, in accordance with 2 CFR 200.430 and 431 between required and authorized services. In addition, these written activities must include where staff time charged to the reserve is reported on the RSA-17, whether under required activities or authorized activities, and the requisite cost reported under these activities. The level of detail should be sufficient to the tracing of funds at obligation and expenditure, and have supporting documentation for support of the RSA-17 (2 CFR 200.302(b)(3)).

*Questions or inquiries on tracking staff time should be directed to **(insert appropriate staff member or designee)**.*