

**Pre-employment Transition Services - A Checklist for State VR Agencies**

This checklist was developed to assist States with the implementation and provision of pre-employment transition services. States may use this checklist as a guide in organizing required documents and/or as a plan of action moving forward. We have developed the checklist as a fillable word document that may be used electronically, and as such, under the **Status** column we have inserted a drop-down menu, just click on “**Choose an item**”, and then click on the arrow to select a response for each item in the checklist.

I. Transition Service Delivery Structure	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<p><i>In structuring the delivery of transition services, the VR agency must consider the various requirements under the Act. For example, pre-employment transition services provided under section 113 of the Act, and <a href="#">34 CFR §361.48(a)</a> are available only to students with disabilities. However, transition services provided for the benefit of a group of individuals under section 103(b)(7) of the Act and <a href="#">34 CFR §361.49(a)(7)</a> may be provided to both students and youth with disabilities. Youth with disabilities who are not students may receive transition-related services identified in an individualized plan for employment (IPE) under section 103(a) of the Act, but may not receive pre-employment transition services because these services are limited to students with disabilities. On the other hand, students with disabilities may receive pre-employment transition services with or without an IPE under section 113 of the Act, or may receive pre-employment transition services and/or transition services under an IPE in accordance with section 103(a)(15) of the Act.</i></p>				
<p>1. The VR agency can describe their service delivery structure and strategies for serving students with disabilities who are eligible and potentially eligible for pre-employment transition services. <b>[Service delivery will also be outlined in your Policies and Procedures, so you may want to cross-reference Section VIII Transition Policies and Procedures.]</b></p>	<p>Choose an item.</p>			

I. Transition Service Delivery Structure	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
a. Strategies include how VR will provide and pay for pre-employment transition services (e.g., in-house, TPCAs, fee-for service, contracts, etc.)	Choose an item.			
b. Strategies include how VR is making all required activities available to students with disabilities statewide, including those students who are potentially eligible for VR services.	Choose an item.			
c. In-house agency staff provide all five, or a portion of the required pre-employment transition service activities in a group or individually directly to students with disabilities.	Choose an item.			
d. <b>Local educational agencies (LEAs)</b> , through contracts, fee for service agreements, and/or third-party arrangements provide all five, or a portion of the required pre-employment transition service activities. *Written strategies for providing Pre-ETS in a group or individually will include expected outcomes, reporting requirements, and identify services that are new and expanded; and that supplement, not supplant transition services provided under IDEA.	Choose an item.			
e. <b>Community rehabilitation providers (CRPs)</b> , through contracts and/or fee for service agreements, provide all five, or a portion of the required pre-employment transition service activities. *Written strategies for providing Pre-ETS in a group or individually will include expected outcomes & reporting requirements.	Choose an item.			

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f. <b>Other vendors or partners such as workforce, universities, CILs, etc.</b> through contracts and/or fee for service agreements provide all five, or a portion of the required pre-employment transition service activities. *Written strategies for providing Pre-ETS in a group or individually will include expected outcomes & reporting requirements.	Choose an item.			
2. The VR agency has developed an intake process for pre-employment transition services and updated the referral and application processes for VR services.	Choose an item.			
3. The VR agency can identify their use of contracts, interagency agreements, or third-party cooperative arrangements to provide pre-employment transition services and transition services, as appropriate.	Choose an item.			
4. The VR agency has innovative or evidenced-based transition-related services to include pre-employment transition services.	Choose an item.			
5. The VR agency can describe how transition services for youth with disabilities are provided. <b>[Outlined in Sections VI, VII and VIII]</b>	Choose an item.			

II. Outreach	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<p><i>In accordance with the requirements for the formal interagency agreement with the State educational agency, outreach to students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals. The definition of “transition services” in 34 CFR §361.5(c)(55) now includes outreach to and engagement of parents or, as appropriate, the representatives of students or youth with disabilities in the definition of “transition services.”</i></p>				
<p>6. The VR agency has developed strategies for outreach to students with disabilities, including those who are potentially eligible for VR services, and youth with disabilities. <b><i>[Outreach is also one of the required components in your Formal Interagency Agreement, so you may want to cross-reference Section IV State Educational Agency (SEA) Agreement.]</i></b></p>	Choose an item.			
<p>7. Groups or entities included in VR’s target population for its outreach efforts (e.g., unserved and underserved populations, students with individualized education programs (IEPs) or served under section 504, and all other students with disabilities, as well as their families) have been identified.</p>	Choose an item.			
<p>8. At minimum, a description of the purpose of the VR program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals is included in the VR agency’s outreach efforts.</p>	Choose an item.			
<p>9. The VR agency can identify strategies that have been particularly effective in attracting and engaging students and youth with disabilities; and how they have been able to measure and/or determine these strategies are effective.</p>	Choose an item.			

<b>III. Planning for the Delivery of Pre-Employment Transition Services and Transition Services for Students and Youth with Disabilities</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
<p><i>The VR services portion of the Unified or Combined State plan must contain plans, policies, and procedures for coordination between the designated State agency and education officials responsible for the public education of students with disabilities that are designed to facilitate the transition of students with disabilities from the receipt of educational services in school to the receipt of VR services under the responsibility of the designated State agency.</i></p>				
<p>10. The VR agency can describe their methods for identifying students and youth with disabilities in the State and assessing their needs for pre-employment transition services, and transition services, as appropriate.</p>	<p>Choose an item.</p>			
<p>11. The VR agency can describe the needs of students and youth with disabilities for transition services and the needs of students with disabilities for pre-employment transition services identified in the most recent Comprehensive Statewide Needs Assessment (CSNA) and the extent to which these services are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA). If a CSNA has not been conducted or if it was conducted prior to the enactment of WIOA, the VR agency can describe how the needs will be identified and assessed in the next CSNA.</p>	<p>Choose an item.</p>			
<p>12. The VR agency can describe the strategies that have been used or will be used to expand VR services for students and youth with disabilities, including pre-employment transition services for students with disabilities.</p>	<p>Choose an item.</p>			



13. The VR agency has developed a plan for ongoing communication and information dissemination.	Choose an item.			
14. The VR agency has identified quality assurance and performance measures for pre-employment transition services.	Choose an item.			

IV. State Educational Agency (SEA) Agreement	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<p><i>The VR services portion of the Unified or Combined State Plan must include information on a formal interagency agreement with the State educational agency that, at a minimum, provides for the requirements in <a href="#">34 CFR §361.22(b)</a>, including new requirements in <a href="#">34 CFR §361.22(b)(5)</a> and <a href="#">(6)</a>, which address coordination of documentation requirements and contracting limitations for educational agencies imposed by section 511 of the Act.</i></p> <p style="text-align: center;"><a href="#">WINTAC Resources for the Agreement between VR and the SEA</a> <a href="#">WINTAC 511 Resource for Procedures and Documentation Requirements</a></p>				
15. The formal interagency agreement with the SEA has been revised to be consistent with new requirements in the Rehabilitation Act as amended by WIOA.	Choose an item.			
a. Revisions include requirements in <a href="#">§361.22(b)</a> .	Choose an item.			
b. Revisions include requirements related to the coordination and provision of pre-employment transition services in <a href="#">§361.48(a)</a> .	Choose an item.			
16. Revisions to the formal interagency agreement include a description of how the VR agency is coordinating and facilitating the provision of pre-employment transition services with the SEA and LEAs taking into account the following considerations:	Choose an item.			
a. The VR agency can describe its process for determining how programmatic and fiscal responsibilities were developed and implemented in coordinating and facilitating the provision of pre-employment transition services with the SEA & LEA.	Choose an item.			

b. The VR agency can describe strategies being implemented to determine responsibility for those services that may be both a special education or related service under IDEA and a VR service under the Act, as amended by WIOA.	Choose an item.			
c. The VR agency provided joint guidance, training, and technical assistance to VR and educational staff, regarding the requirements related to the provision of pre-employment transition services, and their roles and responsibilities under this agreement.	Choose an item.			
d. The VR agency can describe strategies implemented in partnership with the State educational agency to ensure LEAs in the State implement and observe the provisions of the agreement between VR and the SEA.	Choose an item.			
e. The VR agency developed formal interagency agreements with LEAs, as applicable, and can describe the nature and scope of the agreements.	Choose an item.			
17. Revisions to the formal interagency agreement clearly specify the following requirements:	Choose an item.			
a. The VR agency can describe strategies for consultation and technical assistance to assist educational agencies in planning for the transition of students;	Choose an item.			
b. The VR agency can describe strategies for transition planning by vocational rehabilitation and educational personnel that facilitates the development and implementation of a student's individualized education program (IEP);	Choose an item.			



<p>c. The VR agency can identify roles and responsibilities, including financial and programmatic responsibilities of each agency as outlined in Q#13(a) above to ensure FAPE;</p>	<p>Choose an item.</p>			
<p>d. The VR agency can describe strategies for outreach to and identification of students with disabilities in need of transition services and pre-employment transition services, including a process and responsibilities of LEAs in facilitating referrals of students with disabilities to VR <b><i>[should correspond to strategies the VR agency identified in Section II. Outreach];</i></b></p>	<p>Choose an item.</p>			
<p>e. The VR agency can identify coordination activities to satisfy the documentation requirements set forth in section 511 of the Rehabilitation Act with regard to students with disabilities who are seeking subminimum wage employment;</p>	<p>Choose an item.</p>			
<p>f. Procedures for resolving interagency disputes under the agreement, including procedures for LEAs to initiate the process (IDEA);</p>	<p>Choose an item.</p>			
<p>g. The formal interagency agreement includes an assurance that neither the SEA nor the LEA will enter into an arrangement with an entity holding a special wage certificate under section 14(c) of the Fair Labor Standards Act for the purpose of operating a program under which a youth with a disability is engaged in work at a subminimum wage;</p>	<p>Choose an item.</p>			

<p>18. Revisions to the formal interagency agreement includes a construction clause stating the following: “Nothing under title I of the Rehabilitation Act shall be construed as reducing a LEA's or any other agency's obligation under the IDEA to provide or pay for transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education (FAPE) to children with disabilities.”</p>	<p>Choose an item.</p>			
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<b>V. Provision of Pre-Employment Transition Services</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
<p><i>There are five required activities (most beneficial to a student in the early stages of employment exploration) that are provided directly to eligible or potentially eligible students with disabilities. There are nine authorized activities described in <a href="#">34 CFR §361.48(a)(3)</a> that VR agencies may implement to improve the transition of students with disabilities from school to postsecondary education or an employment outcome. Pre-employment transition coordination activities, described in <a href="#">34 CFR §361.48(a)(4)</a>, include activities that each local VR office must engage in to coordinate and facilitate the provision of pre-employment transition services to students with disabilities in need of such services.</i></p>				
<p>19. The VR agency can identify the minimum age that students with disabilities may begin receiving pre-employment transition services in the State and how it was determined.</p>	<p>Choose an item.</p>			
<p>20. The VR agency can identify the minimum age for the provision of transition services, and maximum age for the receipt of services under IDEA by students with disabilities in the State.</p>	<p>Choose an item.</p>			
<p style="text-align: center;"><b>Required Activities</b></p> <p>The “five required” activities under pre-employment transition services must be provided to students with disabilities. [Section 113(b) of the Act and <a href="#">§361.48(a)(2)</a> and implementing regulations]</p>				
<p>21. The VR agency can describe how they are providing each of the required activities under pre-employment transition services to students with disabilities including those individuals who are potentially eligible for VR services, VR applicants or eligible individuals, and eligible individuals with an IPE.</p>	<p>Choose an item.</p>			
<p>(1) Job exploration counseling</p>	<p>Choose an item.</p>			

<p>(2) Work-based learning experience, including coordination, selection of the work-based learning experience (e.g., type of work, paid or unpaid, actual work or simulated, during or after school) and setting (e.g., in-school or community-based setting, group or individual basis, integrated or non-integrated settings).</p>	<p>Choose an item.</p>			
<p>a. If work-based learning experiences are paid, the VR agency can verify that students are earning competitive wages or stipends commensurate with wages or stipends paid to students without disabilities participating in similar experiences.</p>	<p>Choose an item.</p>			
<p>b. The VR agency can describe what, if any, services are provided to an individual while participating in a work-based learning experience (including costs incurred by employers and reimbursed by the VR agency).</p>	<p>Choose an item.</p>			
<p>(3) Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education (including settings in which it is provided).</p>	<p>Choose an item.</p>			
<p>(4) Workplace readiness training (coordination and provision, including types of training activities and settings).</p>	<p>Choose an item.</p>			
<p>(5) Instruction in self-advocacy, which may include peer mentoring.</p>	<p>Choose an item.</p>			
<p>22. The VR agency can describe how students with disabilities are informed of their options and involved in the selection of pre-employment transition services and the entity to provide such services.</p>	<p>Choose an item.</p>			

23. The VR agency can describe how they monitor and evaluate the provision of the required pre-employment transition services.	Choose an item.			
a. To include VR agency staff;	Choose an item.			
b. Purchased services from vendors;	Choose an item.			
c. Third Party Cooperative Arrangements (TPCAs)	Choose an item.			
24. Of the students with disabilities who have received pre-employment transition services, the VR agency is able to track how many have applied for VR services.	Choose an item.			
25. The VR agency can track additional VR services received by students with disabilities in receipt of pre-employment transition services, and identify what additional services are most frequently provided.	Choose an item.			
<p><b>Authorized Activities</b></p> <p>The “nine authorized” activities - may be provided if reserved funds remain after all required services have been made available to all students with disabilities who need them. [Section 113(c) of the Act and <a href="#">§361.48(a)(3)</a> and implementing regulations]</p> <p>This section also contains items related to fiscal forecasting which may be cross-referenced with the Sections IX and X.</p> <p><b>WINTAC Resource:</b> <a href="#">Moving from Required Pre-employment Transition Services to Authorized Activities</a></p>				
26. The VR Agency completed a process (e.g., CSNA, fiscal forecasting, or other planning activities) to determine whether funds remain and can share their methodology used to determine the amount of Federal funds that need to be reserved and expended for the provision of the required activities under section 110(d)(1) of the Act, to determine the amount available for the provision of the authorized activities.	Choose an item.			

<p>27. The VR agency's methodology for assessment of need includes the following:</p> <ul style="list-style-type: none"> <li>• The total number of students with disabilities in the state who are potentially eligible students, and where this number came from;</li> <li>• The method used to determine the need for pre-employment transition services;</li> <li>• Verification that the required services have been made available all students with disabilities who need them, by including a description of all the ways pre-employment transition services are delivered to students with disabilities that need them, and how students with disabilities that need pre-employment transition services can receive those services;</li> </ul>	<p>Choose an item.</p>			
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<p>28. The VR agency has conducted their fiscal forecasting to identify the target amount of reserve funds that will be necessary to provide the required pre-employment transition services to students with disabilities, to include the following:</p> <ul style="list-style-type: none"> <li>• The number of students with disabilities VR is currently providing pre-employment transition services to;</li> <li>• Identify the minimum amount required to be reserved and expended for pre-employment transition services (at least 15% of the VR grant allotment);</li> <li>• The average cost per student that it cost VR to provide pre-employment transition services this year;</li> <li>• The projected number or increased number of students with disabilities VR thinks they will be able to provide pre-employment transition services to this year, based on all the ways VR will provide or arrange for the provision of pre-employment transition services;</li> <li>• The average cost per student that VR projects it will cost to provide pre-employment transition services this year;</li> <li>• The cost of coordination activities for the year;</li> <li>• Show “the math” (the amount VR projects to spend on pre-employment transition services based on the per-student cost projected, added to the number of students VR projects to serve, added to the coordination costs; and subtract that total from the total 15% reserve amount to get the remainder that is available to spend on authorized activities);</li> <li>• Identify the amount, if any, available to spend on authorized activities.</li> </ul>	<p>Choose an item.</p>			
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29. With funds remaining after all necessary required activities have been made available, identify which authorized activities the VR agency has been able to provide that 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.	Choose an item.			
30. If authorized activities are purchased by the VR agency, a copy of the type of agreement utilized by the agency to provide the authorized services is available.	Choose an item.			
<p><b>Pre-Employment Transition Coordination Activities</b></p> <p>The “four pre-employment transition coordination” activities - must be carried out, and reserve funds may be used to pay for pre-employment transition coordination activities. These four coordination activities may be necessary for arranging and providing direct pre-employment transition services, and are therefore included under the implementation of pre-employment transition services [Section 113(d) of the Act and <a href="#">§361.48(a)(4)</a> and implementing regulations]</p>				
31. The VR agency can describe efforts to engage with partners and education programs to collaboratively provide pre-employment transition coordination activities, including planning activities and joint activities in the four areas specified below:				
(1) Attending IEP meetings, when invited	Choose an item.			
(2) Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities	Choose an item.			
(3) Working with schools to coordinate and ensure the provision of pre-employment transition services	Choose an item.			
(4) Attending person-centered planning meetings for students with disabilities receiving services under title XIX of the Social Security Act, when invited	Choose an item.			



VI. Provision of Group Transition Services	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<p><i>A student or youth with a disability is not required to have applied or been determined eligible for VR services to receive general transition services provided to groups under section 103(b)(7) of the Act and <a href="#">34 CFR §361.49(a)(7)</a>. Therefore, a VR agency may, but is not required to, provide or collect applications from students and youth with disabilities receiving transition services under <a href="#">34 CFR §361.49(a)(7)</a>. These services may be provided in a variety of settings, including classroom, employment, and community-based settings. However, they should be provided in integrated settings to the maximum extent possible to best prepare students and youth with disabilities for competitive integrated employment.</i></p> <p><i>Students and youth with disabilities may continue to receive generalized transition services under this authority while also receiving individualized VR services under an IPE.</i></p> <p><i>Pre-employment transition services may be provided in a group setting to students with disabilities who have not applied or been determined eligible for VR services, as discussed in <a href="#">34 CFR §361.48(a)</a>. However, pre-employment transition services cannot be provided to students with disabilities as a service for groups under section 103(b)(7) of the Act or <a href="#">34 CFR §361.49(a)(7)</a>.</i></p>				
32. If the VR agency provides services under the “services to groups” authority, the VR agency can describe services provided as group transition services; and how the VR agency provides or coordinates the provision of these services.	Choose an item.			

VII. Provision of Individualized Transition Services	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<p><i>To receive individualized transition services, a youth or student with a disability must be determined eligible for the VR program and have a signed IPE pursuant to section 103(a) of the Act and final <a href="#">34 CFR §361.48(b)</a>.</i></p>				
33. The VR agency can describe the provision of individualized transition services, including the types of services provided,	Choose an item.			

<b>VII. Provision of Individualized Transition Services</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
when and to whom these services are provided, and how they are provided.				
34. The agency will describe how all youth with disabilities will have access to the array of transition services the VR agency provides, which may or may not include pre-employment transition services.	Choose an item.			

<b>VIII. Transition Policies and Procedures</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
<p><i>The VR agency must revise policies and procedures related to the provision of pre-employment transition services to students with disabilities and transition services to students and youth with disabilities to bring them into alignment with the requirements of the Act, as amended by WIOA. Many of the focus areas and action items above regarding pre-employment transition services will help inform the VR agency's policy and procedures outlined in this section.</i></p>				
<p>35. The VR agency has developed, revised or implemented their policies and procedures to address changes related to pre-employment transition services requirements, including the provision of services to students with disabilities who are potentially eligible for VR services.</p>	<p>Choose an item.</p>			
<p>36. The VR agency has included in their policy the definition of a student with a disability and a youth with a disability.</p>	<p>Choose an item.</p>			
<p>37. The VR agency's policies and procedures include information related to referrals for pre-employment transition services, application for VR services, collaborative service provision, service agreements, and documenting, tracking and reporting such services.</p>	<p>Choose an item.</p>			
<p>38. The VR agency has a policy that directs counselors to ensure students with disabilities determined eligible for the VR program have an IPE in place prior to exiting the school setting.</p>	<p>Choose an item.</p>			

39. The VR agency's policies and procedures describe the IPE development process for students and youth with disabilities, including the 90-day timeline requirement.	Choose an item.			
40. The VR agency uses projected IPE goals for students and youth with disabilities; and the policies and procedures outline a process for when projected goals are used and amended.	Choose an item.			
41. The VR agency has a policy that directs counselors to ensure once determined eligible, any pre-employment transition services the student receives will be listed on the IPE.	Choose an item.			
42. The VR agencies policies and procedures reflect guidance if a student needs a service that goes beyond the scope of pre-employment transition services, and such additional service is listed on the student's approved IPE, the VR agency will pay for those costs with non-reserved VR funds.	Choose an item.			
<b>IX. Internal Controls</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
<p><i>Section 110(d)(1) of the Rehabilitation Act of 1973, as amended (Rehabilitation Act), requires States to reserve at least 15 percent of their VR allotments for the provision of pre-employment transition services. The reserved funds must be spent in providing, or arranging for the provision of, pre-employment transition services outlined in section 13 of the Rehabilitation Act to students with disabilities.</i></p> <p><i>VR agencies must ensure they are able to track pre-employment transition services expenditures properly with the reserved funds (<a href="#">preamble Final VR Regulations at 81 FR 55703</a>); and that their internal control processes ensure the accuracy and validity of the data have been implemented.</i></p> <p style="text-align: center;"><b>RSA Resource: <a href="#">RSA: Period of Performance for Formula Grant Awards FAQs</a></b></p>				

<b>IX. Internal Controls</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
<i>WINTAC Resource: <a href="#">Time Allocation Guide</a></i>				
43. The VR agency has developed policies and procedures that implement the agency’s internal controls regarding the reservation and expenditure of VR grant funds for the provision of pre-employment transition services to ensure the reserve funds are spent in accordance with the statute and regulations, and reported properly on the SF-425.	Choose an item.			
44. The VR agency’s internal controls include reporting procedures for monitoring and tracking the funds spent on purchased services and pre-employment transition services provided directly by VR agency personnel.	Choose an item.			
45. The VR agency’s internal controls include how staff are tracking their time spent providing the required pre-employment transition services, and the coordination activities.	Choose an item.			
46. The VR agency’s internal controls include the process for how pre-employment transition services expenditures are authorized, approved, and paid to vendors.	Choose an item.			
<b>X. Administrative Costs</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
<i>Under section 110(d)(2) of the Act and <a href="#">34 CFR §361.65(a)(3)(ii)(B)</a>, funds reserved and expended toward the provision of pre-employment transition services may not be used to pay agency administrative costs associated with the provision of such services. Nothing prevents a State</i>				

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<p><i>from using regular VR funds to pay agency administrative costs associated with the provision of pre-employment transition services. This provision means that any administrative costs charged to the Federal VR award are not permitted as expenditures to meet the 15 percent reserve, which may only be met with expenditures for the provision of pre-employment transition services either directly through the required activities, or to enhance the provision of such services via the authorized activities.</i></p> <p><i>RSA generally will not require grantees to extract administrative costs that exist within contracts from total contract costs when reporting the cost of the contract as pre-employment transition services expenditures.</i></p>				
<p>47. The VR agency can describe strategies for tracking expenditures to ensure that administrative costs do not count toward the amount required to be reserved and expended for the provision of pre-employment transition services.</p>	<p>Choose an item.</p>			
<p>48. The VR agency can describe strategies for tracking administrative cost expenditures to ensure that any administrative expenditures charged to the VR award are not reported as expenditures meeting the reservation requirement for pre-employment transition services.</p>	<p>Choose an item.</p>			
<p>49. If the VR agency uses fee for service or contracts for the provision of Pre-ets, describe how these costs are allocated toward the funds reserved (<i>While section 110(d)(2) of the Act and <a href="#">§361.65(a)(3)(ii)(B)</a> restricts pre-employment transition services reserve funds from being used to pay for administrative costs associated with the provision of such services or any VR service, RSA has determined that this provision is not applicable to contracts for the direct provision of purchased pre-employment transition services. Therefore, administrative costs associated with the direct provision of required pre-employment transition services purchased through a case service contract,</i></p>	<p>Choose an item.</p>			

IX. Internal Controls	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<i>which are reasonable, necessary and allocable to the provision of the required activities, may be paid with reserve funds).</i>				
XI. Tracking and Reporting	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<p><i>RSA uses the data collected through the RSA-911 to describe the performance of the VR and Supported Employment programs in the Annual Report to the Congress and the President as required by sections 13 and 101(a)(10) of the Rehabilitation Act of 1973, as amended (the Act). RSA also uses these data to assess the performance of the VR program through the calculation of evaluation standards and performance indicators as required by section 106 of the Act, which must be consistent with the common performance accountability measures established under section 116 of title I of WIOA for the core programs of the workforce development system.</i></p> <p><b>Resources:</b> <a href="#">PD-16-04 - "Revision of Policy Directive (PD) 14-01 instructions for the completion of the Case Service Report (RSA-911) for the State Vocational Rehabilitation Services Program and the State Supported Employment Services Program"</a> and <a href="#">Guidelines: Supporting Documentation for Case Service Report (RSA-911) Revised June 14, 2017</a></p>				
50. Whether provided in a group setting or on an individual basis, the VR agency can track and report pre-employment transition services and activities for each student that is receiving such services.	Choose an item.			
51. The VR agency is collecting the following required data elements associated with the 911 on <b>Student Status – Pre-ETS:</b>	Choose an item.			

IX. Internal Controls	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<ul style="list-style-type: none"> <li>Individual is a student with a disability and is receiving transition services under an Individualized Education Program (IEP).</li> <li>Individual is a student with a disability who does not have a section 504 accommodation and is not receiving services under an IEP.</li> <li>Individual is not a student with a disability.</li> </ul>				
<p>52. As per requirements in 34 CFR 361.47 and 34 CFR 361.56, the VR agency is maintaining supporting documentation of the disability, which may include case note documenting counselor observation, review of school records, statements of education staff; or referral form for pre-employment transition services with the identification of a student’s disability, signed by school staff and parent/guardian if the student is under the age of majority in a State (parental consent to participate in pre-employment transition services is governed by State law, as well as policies of the educational programs and the DSU); or a copy of an individualized education program (IEP) document, SSA beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination or documentation relating to 504 accommodation(s).</p>	Choose an item.			
<p>53. The VR agency is collecting the following required data elements for an individual receiving pre-employment transition services who has not applied for or been determined eligible for VR services:</p> <ul style="list-style-type: none"> <li>a unique identifier,</li> </ul>	Choose an item.			



IX. Internal Controls	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<ul style="list-style-type: none"> <li>• social security number (if available),</li> <li>• date of birth,</li> <li>• race,</li> <li>• ethnicity,</li> <li>• student with a disability,</li> <li>• start date of pre-employment transition services,</li> <li>• pre-employment transition services provided</li> </ul>				
<p>54. When reporting required data for each pre-employment transition service category (i.e., Job Exploration Counseling, Work Based Learning Experiences, Counseling on Enrollment Opportunities, Workplace Readiness Training, and Instruction in Self Advocacy), for all individuals receiving pre-employment transition services, including applicants and eligible individuals; the VR agency is also tracking and reporting the following data elements which record how the service was provided, the type of service provider and the amount expended for the service:</p> <ol style="list-style-type: none"> <li>1) <b>Whether the service was provided by VR Agency Staff (in-house), or</b></li> <li>2) <b>If provided through VR Agency Purchase:</b> <ul style="list-style-type: none"> <li>▪ Purchased Service Provider Type</li> <li>▪ VR Program Expenditure for Purchased Service</li> </ul> </li> <li>3) <b>If provided by Comparable Services and Benefits Providers</b> <ul style="list-style-type: none"> <li>▪ Comparable Services and Benefits Provider Type</li> </ul> </li> </ol>	Choose an item.			
55. The VR agency's policies and procedures include guidance regarding documentation and reporting requirements for non-	Choose an item.			

<b>IX. Internal Controls</b>	<b>Status</b>	<b>Person(s) Responsible</b>	<b>Timeframe For Completion</b>	<b>Corresponding Document and Location (where it lives)</b>
applicants, applicants, and eligible individuals who are students with disabilities receiving pre-employment transition services.				
56. The VR agency's policies include procedures for when a student ceases to become a student and pre-employment transition services must stop.	Choose an item.			

XII. State Plan Goals	Status	Person(s) Responsible	Timeframe For Completion	Corresponding Document and Location (where it lives)
<i>In accordance with 101(a)(15)(A) and (D) of the Act, VR agencies must assess the needs of students and youth with disabilities for transition and pre-employment transition services and identify the strategies, goals, and priorities to address these needs in the VR services portion of the Unified or Combined State Plan.</i>				
57. The VR needs of students and youth with disabilities identified in the CSNA are reflected in the goals of the VR services portion of the Unified or Combined State Plan ( <a href="#">34 CFR §361.29(c)(4)(i)</a> ).	Choose an item.			
58. The VR agency has established measurable goals and objectives or strategies for serving students and youth with disabilities, that reflect collaboration with the SEA, LEAs, as appropriate and other entities providing services to students and youth with disabilities.	Choose an item.			
59. The VR agency can describe the outcomes that have been achieved as a result of the above goals or strategies.	Choose an item.			

**Primary Sources:**

- [RSA FY 2018 Monitoring and Technical Assistance Guide](#)

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- [Federal Regulations: WORKFORCE INNOVATION & OPPORTUNITY ACT State Vocational Rehabilitation Services Program; State Supported Employment Services Program; Limitations on Use of Subminimum Wage - Final Rule](#)
- [RSA CSAVR PPT: Overview and Discussion of Federal Regulations on Transition Services and Pre-Employment Transition Services](#)
- [RSA CSAVR PPT: Overview and Discussion of Federal Fiscal Regulations, including fiscal accountability for pre-employment transition services](#)
- [Time Allocation Guide](#)
- [Moving from Required Pre-employment Transition Services to Authorized Activities](#)
- [CSAVR Fall 2017 PPT Presentation:](#)
  - [Moving from Required to Authorized Services](#)
  - [On the Right Track: Tracking and Reporting Pre-Employment Transition Services](#)
- [WINTAC Resources for the Agreement between VR and the SEA](#)
- [WINTAC 511 Resource for Procedures and Documentation Requirements](#)