

Pre-Employment Transition Services: An Opportunity to Engage America's Youth

Policy Summary

Many students with disabilities still face an employment narrative contrary to their peers without disabilities—and obtain post-school employment and post-secondary education at significantly lower rates. As the Workforce Innovation and Opportunities Act (WIOA) of 2014 enters its second decade, progress in engaging students and youth with disabilities through Pre-Employment Transition Services (“Pre-ETS”) presents a unique and exciting opportunity for Vocational Rehabilitation (VR) agencies to flip this narrative, remove the stigma attached to students with disabilities, and assist a younger generation in achieving competitive, integrated employment (“CIE”).

Background

Pre-ETS Overview

Every year, states budget millions of dollars towards vocational rehabilitation (“VR”) programs for people with disabilities. The federal government provides significant additional funds for these programs.¹ These programs provide a wide range of services to people with disabilities in their communities.

VR Services:

- Career Exploration
- Job Search and Placement Assistance
- Training, Education, and Skill Building
- Vocational Counseling
- Post-employment Support
- Private Sector Engagement
- Disability Innovation Fund
- Self-Employment/Business Ownership
- Assistive Technology and assistive supports

In 2014, Congress passed the Workforce Innovation and Opportunity Act (“WIOA”) to amend the Rehabilitation Act (“Rehab Act”). WIOA “heralded a seismic shift in how state [VR] agencies

provide transition-related services to students and youth with disabilities.”² This legislation expanded VR’s focus to a new generation of individuals with disabilities and can help change the stigmas students with disabilities face daily.

Prior to WIOA, “Employment outcomes for youth with disabilities had remained dismal and stagnant for several decades with many youth with intellectual and developmental disabilities continuing to transition from school into sheltered workshops where they would earn subminimum wages.”³ WIOA ambitiously sought to change these outcomes and expectations for youth and students with disabilities and their families or adult support systems. One of the major benefits, and challenges, WIOA provided is its less than explicit guidelines on how to achieve the goal of CIE for students with disabilities. WIOA offers state VR agencies incredible flexibility in providing students with individualized and innovative solutions, by mandating several directives correlating to its goal of CIE.

Pre-ETS mandates include:

1. Providing Pre-ETS
2. Serving “potentially eligible” students
3. Coordinating with educational agencies and other partners
4. Allocating 15% of the VR budget

The major focus for many states has been the requirement to set aside—and more importantly, use—at least 15% of their total VR budget to provide the required Pre-ETS specifically for students with disabilities. This requirement applies to the total amount a state allocates for VR services—whether the funds come from the state, private, local, or federal sources, or the reallocation

¹ See policy brief #1 for detailed information on the state/federal VR funding match.

² Joshua P. Taylor & Holly N. Whittenburg, Introduction to the special issue: Examining the impact of pre-employment transition services, *Journal of Vocational Rehabilitation* at 155.

³ Joshua P. Taylor & Holly N. Whittenburg, The promise and the challenge of pre-employment transition services: The Workforce Innovation and Opportunity Act after ten years, *Journal of Vocational Rehabilitation* at 157 [“Discussion”].

process. These services are meant to be reserved for not just currently eligible students, but also potentially eligible students, expanding the reach to more students and youth for the labor market. While also providing a seamless transition into the VR service system for those eligible. Prioritizing the investment in America's youth with disabilities, the mandated 15% minimum reserve requirement is a floor, not a ceiling—states are absolutely allowed to allocate more of their VR budget to pre-ETS as they see fit.

The focus of Pre-ETS for many state agencies is the 15% minimum reserve requirement, but there are many other important provisions of WIOA.

WIOA pre-ETS cover five required categories of services:

1. Job Exploration Counseling (“JEC”)
2. Work-based Learning Experiences (“WBLEs”)
3. Post-secondary Education (“PSE”) Opportunities Counseling
4. Workplace Readiness Training (“WRT”)
5. Instruction in Self-Advocacy (“ISA”)

Scores of activities fall within each of the five Pre-ETS categories of service. WIOA also mandates state agencies provide coordination activities between VR counselors and school personnel to provide students holistic support for their post-secondary livelihoods.

Coordination activities include:

1. Individualized education program (“IEP”) meeting attendance
2. Partnerships within the local workforce for work opportunity creation
3. School collaboration
4. Person-centered planning meetings participation

Agencies demonstrating they can fully fund these four mandated coordination activities have the option to offer nine additional activities to students with disabilities. These additional activities have the goal of “independent living and integration into communities and competitive workplaces.”⁴

“Early disability-employment interventions designed to help transition-age youth with disabilities develop skills and habits for adult life is crucial to increase their chance of (a) future employment, (b) accessing post-secondary education (e.g., apprenticeship programs, skill training certificates, vocational-technical school training, two- and four-year colleges and universities), (c) maximizing lifetime earnings, (d) increasing health and well-being, and (e) feeling increased self-efficacy and stronger self-concept as they move from adolescence to emerging adulthood.” Allison R. Fleming, et al.⁵

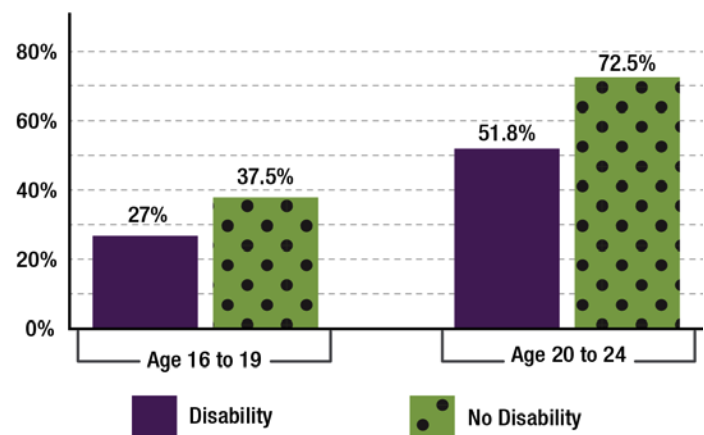
Pre-ETS of the Past: Intention of WIOA

Pre-ETS are, and have always been, more than just a regulatory checkbox—the requirement was added to create an early pipeline for workforce by investing in American youth for those not just currently eligible but also potentially eligible. “Policymakers envisioned a comprehensive offering of the services, skills, knowledge, and experiences youth with disabilities needed to be successful at work based on the research literature.”⁶

Disability rights champion and former chairman of the Senate Committee on Health, Education, Labor and Pensions (“HELP committee”) Senator Tom Harkin advanced WIOA saying, “This bill also makes groundbreaking changes that will raise prospects and expectations for Americans with disabilities, many of whom, under current law, are shunted to segregated, subminimum wage settings without ever receiving the opportunities and skills to succeed in competitive, integrated employment. It will stem the flow of young people into segregated employment by requiring that they be given experience in integrated settings, and require state Vocational Rehabilitation programs to work with individuals to develop an individual employment plan and support them in integrated work settings.”⁷

Students with disabilities obtain post-school employment and enroll in post-secondary education at rates significantly lower than their peers without disabilities. Figures 1 illustrate these discrepancies. The five categories of activities Pre-ETS introduced are all research-backed and meant to decrease this discrepancy with the singular goal of CIE.

Figure 1
2023 Youth Force Participation Rate



Source: <https://www.dol.gov/agencies/odep/research-evaluation/statistics>

⁴ Details and descriptions of the nine additional authorized activities can be found at <https://transitionta.org/topics/pre-ets/>; codified in the Rehab Act section 113(c) and §361.48(a)(3).

⁵ Enhancing transition outcomes: A toolkit to facilitate data-driven pre-employment transition services, JVR at 197.

⁶ Discussion at 158.

⁷ Committee on Education & the Workforce.

Policy Position

Pre-ETS of Today: How WIOA is Working

“Since WIOA was signed into law in 2014, VR agencies have been addressing barriers to effective and equitable transition services such as creating shared understanding of these services, building local partnerships, partnering with families, and addressing disparate transition outcomes based on race, sex, and disability category.” - Marcus Poppen, et al.⁸

Implementation of Pre-ETS has been varied across states and continuously improving. The flexibility WIOA provides state agencies with the freedom to explore various approaches, and some level of trial and error. The mandate for states to spend 15% of their VR funds on Pre-ETS has been one of the major focuses for state agencies in the beginning years of WIOA implementation. The funding requirement is a basic, quantitative measure that is binary to track and report out. The first decade of Pre-ETS has seen an increase in states both achieving their 15% spend requirement and increasing their overall Pre-ETS budget. Figures 2 and 3 show this improvement.

Figure 2
Increase in Pre-ETS Budget

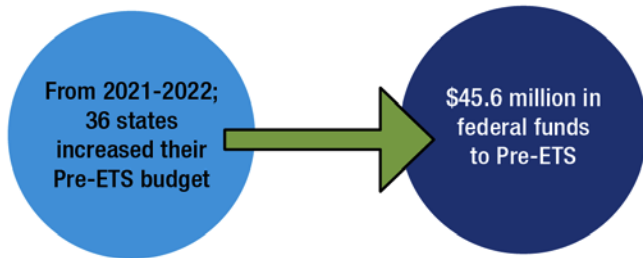
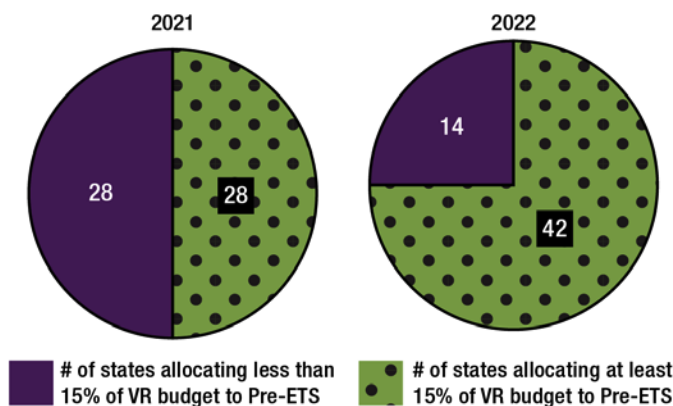
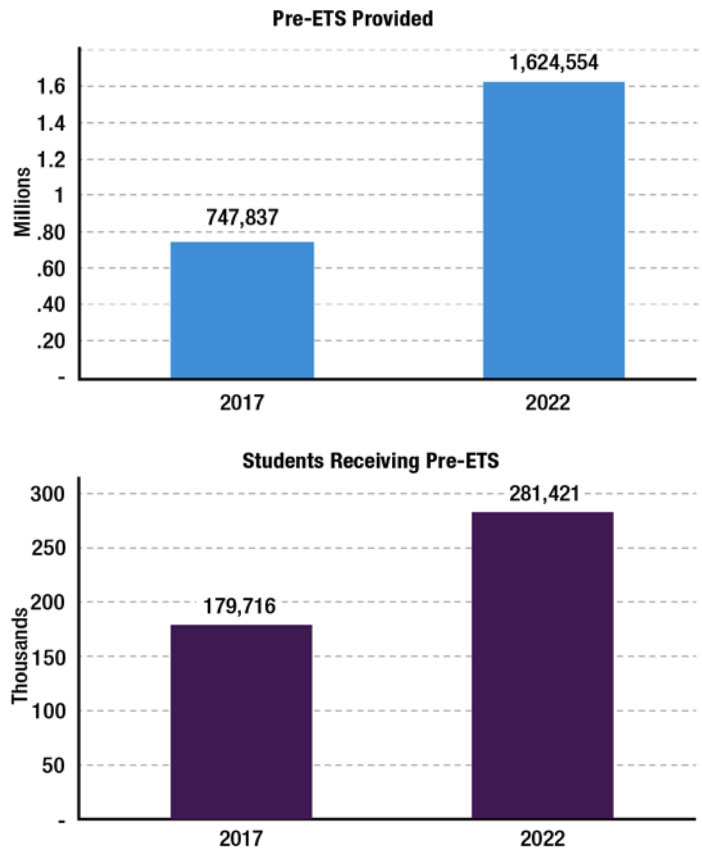


Figure 3
State Allocation of VR Budget to Pre-ETS in 2021 and 2022⁹



Beyond achieving their baseline spend requirements—Pre-ETS are reaching more students with disabilities and providing more services. Figure 4 shows this increased reach.

Figure 4
Increased Reach of Pre-ETS



As VR agencies are figuring out how to optimize their Pre-ETS offerings, their tracking mechanisms can also become more nuanced. If the spend requirement, number of students reached, and number of services provided are kpi's indicating Pre-ETS reach—Performance Outcome indicators can reveal the overall effectiveness of the services offered. VR has seen marked improvement in the major performance outcome indicators since WIOA's inception as well. Figure 5 shows this improvement.

Figure 5
Better WIOA Performance Outcomes

	First PY	PY 2022
Measurable skills gains rate	21%	49%
Credential attainment rate	11%	38%
Employment rate Q2 after exit	50%	56%
Median earnings Q2 after exit	\$3,875	\$5,130
Employment rate Q4 after exit	43%	53%

⁸ Transition self-assessment tool: The development and field testing of a statewide assessment of pre-employment transition services, JVR at 176.

⁹ Numbers include territories for a total greater than 50.

Pre-ETS of the Future-Opportunities in WIOA's Second Decade

As more states have achieved their baseline Pre-ETS goals year-over-year, WIOA's second decade presents new opportunities for state VR agencies to tackle more nuanced evaluations of their Pre-ETS programs.

Opportunities for Improvement Include:

- Increase opportunities for meaningful and intentional listening to youth's voices to ensure the services being delivered are meeting their unique needs.
- Engage younger students and collaborate with their families and adult support systems to truly meet them where they are and support them in building their career pathway.
- 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.
- Ensure a seamless transition from pre-ETS to VR services to adulthood for eligible students program and engage them on a continuum of robust VR services.
- Examine fiscal forecasting to reduce complexity where possible to increase the reach of services offered to students with disabilities.
- Build coalitions across education and VR to develop staff capabilities to drive consistency and excellence of service delivery.
- Ensure service to a diverse population of students across the entire breadth of disability, including potentially-eligible students with mental health conditions.

There has been an increased push for public agencies to be able to demonstrate data-driven outcomes, and VR is no exception. To match this goal, focus can start shifting to a more nuanced analysis of Pre-ETS effectiveness. Collecting, analyzing, and using granular data about the Pre-ETS offered and what students are receiving services will allow for a better evaluation of best practices in the Pre-ETS space.

Comprehensive research on the actual implementation of these practices is still in its beginning stages, but recent years have seen an increase in data analysis and Pre-ETS focused studies. As implementation data becomes more readily available, states can start using this data to evaluate their own performance. States can shift from tracking how many Pre-ETS they offer, to offering the most effective Pre-ETS.

Recent studies have also suggested racial disparities in Pre-ETS implementation. Increased monitoring of who Pre-ETS are serving, rather than just how many students Pre-ETS are serving, can serve as a starting point in addressing these inequities. "There is a critical need to examine the differential experiences and outcomes of youth from diverse groups to ensure equity of service delivery and better align VR and Pre-ETS with culturally-responsive and sustaining practices." - Taylor and Whittenburg¹⁰

The future of Pre-ETS is promising. As states build upon the successes from the last decade, they have the opportunity to improve the efficiency and effectiveness of the Pre-ETS they are offering to ensure the original intention of WIOA is fully realized—to better support students with disabilities to achieve CIE.

Special Note:

This policy brief is a highlight of accomplishments and a summary of the impact of Pre-ETS in the past decade. It should be noted that implementation of new policies and procedures does not come without challenges and opportunity for growth. For a more in-depth Pre-ETS implementation analysis, challenges, and continuous improvement suggestions, make sure to review the March 26, 2024, Special Issue of Journal of Vocational Rehabilitation focusing on Pre-ETS— <https://tacqg.com/special-issue-jvr-pre-ets/>.

¹⁰ Discussion at 159.