

Pre-Employment Transition Services and Supported Employment

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Pre-Employment Transition Services and Supported Employment

This session will address tracking and reporting issues related to expenditures incurred during the provision of pre-employment transition services and supported employment services, as well as the staff time and travel spent providing those services, including—

- What are pre-employment transition services, including the requirement to reserve funds for the provision of these services to students with disabilities
- Identifying and tracking expenditures incurred during the provision of pre-employment transition services, including the expenditures incurred during the process of arranging for those services

Pre-Employment Transition Services and Supported Employment

- Reporting expenditures incurred during the provision of pre-employment transition services, as well as the expenditures incurred during the process of arranging for those services (SF-425, RSA-2, RSA-911)
- What are supported employment services, including the requirement to reserve funds for the provision of these services to youth with the most significant disabilities requirement
- Tracking, expending and reporting supported employment funds
- General questions and answers

Pre-Employment Transition Services

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What are Pre-Employment Transition Services?

Pre-employment transition services are an early start at job exploration that:

- Assist students with identifying career interests to be further explored through additional VR services, including transition services;
- Must be made available statewide to all students with disabilities in need of such services, regardless of whether a student has applied and been determined eligible for VR services;

What are Pre-Employment Transition Services? (cont.)

- May begin once a student requests or is recommended for one or more pre-employment transition services and documentation of a disability (e.g., IEP, transition plan, school psychological, or other medical documentation of a disability) is provided to the VR agency;
- Must be provided or arranged in collaboration with LEAs; and
- **Are the only activities that can be paid with the funds reserved under section 110(d)(1) of the Act**

What are Pre-Employment Transition Services? (cont.)

Pre-employment transition services (Section 7(30) of the Act and 34 C.F.R. § 361.5(c)(42)) are:

- “Required” activities (Section 113(b) of the Act and 34 C.F.R. § 361.48(a)(2));
- “Authorized” activities (Section 113(c) of the Act and 34 C.F.R. § 361.48(a)(3)); and
- “Pre-employment transition coordination” activities (Section 113(d) of the Act and 34 C.F.R. § 361.48(a)(4)).

“Required” Activities

“Required” activities, which can be provided in a group setting or on an individual basis, are:

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

“Required” Activities (cont.)

Allowable expenditures incurred in carrying out “required” activities may be paid with the funds reserved for the provision of pre-employment transition services.

Job Exploration – Examples

- Information regarding in-demand industry sectors and occupations, as well as nontraditional employment;
- Information about labor market composition;
- Administration of vocational interest inventories; and
- Identification of career pathways of interest to students.

Work-Based Learning Experiences — Examples

- Coordinating a school-based program of job training and informational interviews to research employers;
- Work-site tours to learn about necessary job skills;
- Job shadowing;
- Mentoring opportunities in the community;
- Internships;
- Apprenticeships;
- Short-term employment;
- Fellowships; or
- On-the-job trainings located in the community.

Work-Based Learning Experience Examples - Allowable Services and Costs

Broad examples of types of work-based learning experiences include, but are not limited to:

- Interpreter or reader services or accessible informational materials necessary to ensure equal access to the work-based learning experience, as required by the ADA or Section 504 of the Rehabilitation Act;

Work-Based Learning Experience Examples

- Allowable Services and Costs (cont.)

- The employer requests reimbursement or includes additional costs in the fee schedule to provide the work-based learning experience, for example—
 - Additional costs incurred by the employer for providing the work-based learning experience;
 - Employer-provided staff or trainer who teaches the job tasks to the students;
 - Other costs incurred by the employer in providing the work-based learning experience to the students, which are not individualized in nature; or

Work-Based Learning Experience Examples

- Allowable Services and Costs (cont.)

- Costs that would be incurred or charged by the employer; or
- Costs that would be contracted and paid directly by the VR agency for providing a work-based learning experience to any student with a disability.

Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Educational Programs at IHEs - Examples

- Advising students and parents or representatives on academic curricula;
- Providing information about college application and admissions processes;
- Completing the Free Application for Federal Student Aid (FAFSA);
- Providing resources that may be used to support individual student success in education and training (i.e., disability support services);

Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Educational Programs at IHEs – Examples (cont.)

- Discussing course offerings, career options, and the types of academic and occupational training needed to succeed in the workplace; and
- Exploring postsecondary opportunities associated with career fields or pathways.

Workplace Readiness Training — Examples

- Communication and interpersonal skills;
- Financial literacy;
- Orientation and mobility skills (i.e., to access workplace readiness training or to learn to travel independently);
- Job-seeking skills; and
- Understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment.

Instruction in Self Advocacy — Examples

- Instruction in rights and responsibilities;
- Instruction in how to request accommodations or services and supports;
- Instruction in how to communicate thoughts, concerns, and needs, in order to prepare for peer mentoring opportunities with educational staff such as principals, nurses, teachers, or office staff; or
- Mentoring with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings; and
- Participating in youth leadership activities offered in educational or community settings.

“Bundling” Pre-Employment Transition Services with Other VR Services

When using a fee-for service arrangement for the provision of pre-employment transition services, that have been bundled with other VR services, the VR agency must ensure that the bundled services incorporated within the rate include only allowable pre-employment transition service activities (34 C.F.R. § 361.48(a)) so that the funds reserved under section 110(d)(1) of the Rehabilitation Act will be expended only on allowable pre-employment transition services.

“Bundling” Pre-Employment Transition Services with Other VR Services (cont.)

VR services for eligible individuals (34 C.F.R. § 361.48(b)) that are included in a bundled rate and are not pre-employment transition services may not be paid with funds reserved for pre-employment transition services.

“Authorized” Activities

If funds reserved for the provision of pre-employment transition services remain after all necessary “required” activities have been provided, the VR agency may provide other “authorized” activities 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.

“Authorized” Activities (cont.)

The nine “Authorized” activities (section 113(c) of the Act and 34 C.F.R. § 361.48(a)(3)) include:

- Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated employment;
- Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently; participate in postsecondary education experiences; and obtain, advance in and retain competitive integrated employment;

“Authorized” Activities (cont.)

- Providing instruction to VR counselors, school transition personnel, and other persons supporting students with disabilities;
- Disseminating information about innovative, effective, and efficient approaches to achieve the goals of pre-employment transition services;
- Coordinating activities with transition services provided by LEAs under the IDEA;
- 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;

“Authorized” Activities (cont.)

- Developing model transition demonstration projects;
- Establishing or supporting multistate or regional partnerships involving States, LEAs, DSUs, developmental disability agencies, private businesses, or other participants to achieve pre-employment transition services goals; and
- Disseminating information and strategies to improve the transition to postsecondary activities of individuals who are members or traditionally unserved and underserved populations.

Use of Reserved Funds for “Authorized” Activities

States must determine whether the funds reserved for the provision of pre-employment transition services are sufficient to meet the needs of all students with disabilities needing the “required” services listed in section 113(b) of the Rehabilitation Act and 34 C.F.R. § 361.48(a)(2), as well as the coordination services listed in section 113(d) of the Act and 34 C.F.R. § 361.48(4), prior to using reserved funds for “authorized” activities listed in section 113(c) of the Act and 34 C.F.R. § 361.48(a)(3).

Use of Reserved Funds for “Authorized” Activities (cont.)

- As stated in 34 C.F.R. § 361.48(a)(3), a DSU may provide “authorized” pre-employment transition services *only to the extent that reserved funds remain after providing the “required” and the “coordination” activities.*
- As part of the Comprehensive Statewide Needs Assessment, States should determine the number of students with disabilities in the State. This data will enable States to target the amount of the reserved funds necessary for ensuring the pre-employment transition services are provided to all students needing such services.

Use of Reserved Funds for “Authorized” Activities (cont.)

- To the extent a State demonstrates it has made the pre-employment transition services required by section 113(b) of the Act and 34 C.F.R. § 361.48(a)(2) available to the population of students with disabilities identified in the Comprehensive Statewide Needs Assessment, as well as the coordination activities required by section 113(d) of the Act and 34 C.F.R. § 361.48(a)(4) – or demonstrated it has reserved sufficient funds to provide these services to all students with disabilities needing such services, the State has met the requirement and, therefore, may provide “authorized” activities permitted by section 113(c) of the Act and 34 C.F.R. § 361.48(a)(3).
- Any reserved funds remaining beyond the targeted amount necessary for the provision of “required” and “coordination” activities may then be used for “authorized” activities in 34 C.F.R. § 361.48(a)(3).

Use of Reserved Funds for “Authorized” Activities (cont.)

In analyzing how much of the reserved funds will be available for the provision of “authorized pre-employment transition services in any given FFY,” a State could use the following process:

- I. Determine the approximate number of students with disabilities receiving services through an IEP, those who are receiving services under Section 504 or who are eligible, but are not participating in special education, and those who may be participating in postsecondary education.
- II. Determine the number of students with disabilities in the State that need pre-employment transition services and coordination activities, including those currently receiving such services.

Use of Reserved Funds for “Authorized” Activities (cont.)

- III. Calculate the cost for the provision of pre-employment transition services to students with disabilities, as well as the coordination activities. For most agencies, using the average per student cost to the VR program for the provision of pre-employment transition services and coordination activities will simplify this process.
- IV. Calculate the amount of funds reserved for the provision of pre-employment transition services that must be set aside for the provision of these services to students with disabilities in need of the services, as well as the coordination activities. Multiply the number of students with disabilities that need pre-employment transition services and coordination activities (Step II) by the average cost per student with disabilities for the provision of these services (Step III).

Use of Reserved Funds for “Authorized” Activities (cont.)

- V. Calculate whether the agency’s VR funds required to be reserved for the provision of pre- employment transition services (i.e., minimum of 15 percent of the State’s VR allotment) are sufficient to make required pre-employment transition services, as well as the coordination activities (i.e., those services required by section 113(b) and (d) and 34 C.F.R. § 361.48(a)(2) and (4)) available to all students with disabilities needing such services. Subtract the amount calculated in Step III from the amount of funds the agency is required to reserve for the provision of pre-employment transition services (15 percent of Federal VR allotment). If the result is a negative amount, the agency may not use reserved funds to pay for those “authorized” pre-employment transition services listed in section 113(c) of the Act and 34 C.F.R. § 361.48(a)(3). If the result is positive, the agency may use the remaining balance of funds for the provision of those “authorized” pre-employment transition services.

“Coordination” Activities

Pre-employment transition coordination activities (Section 113(d) of the Act and 34 C.F.R. § 361.48(a)(4)) include:

- Attending IEP meetings, when invited;
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities;
- Working with schools to coordinate and ensure the provision of pre-employment transition services; and
- Attending person-centered planning meetings for students with disabilities receiving services under title XIX of the Social Security Act, when invited.

Administrative Costs

- Section 110(d)(2) of the Rehabilitation Act and 34 C.F.R. § 361.65(a)(3)(ii)(B) prohibit administrative costs from being paid with funds reserved for the provision of pre-employment transition services.
- This means the VR agency may not use funds reserved for pre-employment transition services to pay for any of its activities identified in Section 7(1) of the Rehabilitation Act and 34 C.F.R. § 361.5(c)(2), which define administrative costs.

Administrative Costs (cont.)

- Management, supervisory, accounting and support staff functions are examples of activities generally considered administrative in nature for the VR agency.
- Example: The VR agency's financial management and accounting activities (such as creating authorizations, processing and paying invoices), monitoring contracts, supervision of VR agency staff, and indirect costs would be considered administrative and may not be charged to funds reserved for the provision of pre-employment transition services.

Administrative Costs (cont.)

- The definition of administrative costs in 34 C.F.R. § 361.5(c)(2)(xii) states that travel costs incurred in carrying out the VR program are considered administrative.
- *However, travel costs related to the direct provision of services are excluded from the definition of administrative costs.*
- Therefore, travel costs incurred by personnel in the direct provision of pre-employment transition services may be paid with reserved funds.
- Additionally, personnel lodging and meals required for the provision of such services may also be paid with reserved funds. All travel costs must be necessary, reasonable and consistent with State and agency travel policies.

Tracking Personnel Time

- The State may expend reserved funds to pay the portion of an employee's salary and fringe benefit costs that are directly proportionate to the time the employee spent providing or arranging for the provision of pre-employment transition services (2 C.F.R. § 200.430(i)(1)).
- Because staff time and travel spent providing pre-employment transition services are not considered "administrative costs" under the VR program, such staff time and travel should be accounted for when reporting pre-employment transition service expenditures.
- The use of time estimates, random sampling, etc., do not provide the internal controls necessary to ensure that administrative or other costs, not assignable to the funds reserved for pre-employment transition services, are being excluded so that they are paid with general VR funds rather than the reserved funds.

Tracking Personnel Time (cont.)

- Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed (2 C.F.R. § 200.430). These records must: among other requirements --
 - (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity; and
 - (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; an unallowable activity and a direct or indirect cost activity.

Tracking Personnel Time (cont.)

- A cost objective is defined in 2 C.F.R. § 200.28 and includes a major function of the non-Federal entity, a particular service or project, or a Federal award.
- For purposes of tracking and accounting for staff time and travel with respect to the provision of pre-employment transition services, the required, authorized, and coordination activities are considered separate cost objectives/activities.

Providing or Arranging for Services

Just as is true with the time and travel that staff spend on providing pre-employment transition services may be paid with the reserved funds, the portion of time and travel that staff spend arranging for the provision of pre-employment transition services also may be paid with reserved funds. VR agency or CRP/provider staff who spend time coordinating, facilitating or developing opportunities for students with disabilities to receive pre-employment transition services could be considered “arranging” for pre-employment transition services.

Other activities that could be considered arranging for such services include: time job developers spend developing work-based learning experiences, developing summer employment or internships by working with employers; and coordinating with schools and LEAs to ensure the provision of pre-employment transition services.

RSA-911: Reporting of Pre-Employment Transition Services

- Students receiving pre-employment transition services are reportable individuals and must be tracked in the RSA-911
- Required elements:
 - Unique Identifier
 - Social Security Number (if available)
 - Start Date of Pre-Employment Transition Services
 - Date of Birth
 - Race – Required if student is in elementary or secondary education.
 - Ethnicity – Required if student is in elementary or secondary education.
 - Student with a Disability
 - Pre-Employment Transition Services :
 - Job exploration counseling
 - Work based learning experiences
 - Counseling on enrollment opportunities
 - Workplace readiness training
 - Instruction in self advocacy

RSA-911: Reporting Costs of Pre-Employment Transition Services

- PD 16-04 requires agencies to report purchased pre-employment transition services at the individual level.

Supported Employment Services



What are Supported Employment Services, Including the Reservation Requirement?

Supported employment is:

- Competitive integrated employment, including customized employment, or employment in an integrated work setting in which an individual with a most significant disability is working on a short-term basis toward competitive integrated employment; and
- Employment that is individualized and customized, consistent with the individual's unique strengths, abilities, interests, and informed choice, including with ongoing support services for individuals with the most significant disabilities.

(Section 7(38) of the Act and 34 C.F.R. § 363.1(b))



What are Supported Employment Services, Including the Reservation Requirement? (cont.)

The State uses funds allotted under the Act for the Supported Employment program to:

- Provide supported employment services, as defined in Section 7(39) of the Act and 34 C.F.R. § 361.5(c)(54); and
- Provide extended services in accordance with the requirements in Section 604(b) of the Act and 34 C.F.R. § 363.4(a)(2), to youth with the most significant disabilities for a period of time not to exceed four years, or until such time that a youth reaches the age of 25 and no longer meets the definition of a “youth with a disability” whichever occurs first.

What are Supported Employment Services, Including the Reservation Requirement? (cont.)

SUPPORTED EMPLOYMENT SERVICES.—The term “supported employment services” means ongoing support services, including customized employment, needed to support and maintain an individual with a most significant disability in supported employment, that—

- (A) are provided singly or in combination and are organized and made available in such a way as to assist an eligible individual to achieve competitive integrated employment;
- (B) are based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment; and
- (C) are provided by the designated State unit for a period of not more than 24 months, except that period may be extended, if necessary, in order to achieve the employment outcome identified in the individualized plan for employment.

What are Supported Employment Services, Including the Reservation Requirement? (cont.)

ONGOING SUPPORT SERVICES.—The term “ongoing support services” means services—

- (A) provided to individuals with the most significant disabilities;
- (B) provided, at a minimum, twice monthly— (i) to make an assessment, regarding the employment situation, at the worksite of each such individual in supported employment, or, under special circumstances, especially at the request of the client, off site; and (ii) based on the assessment, to provide for the coordination or provision of specific intensive services, at or away from the worksite, that are needed to maintain employment stability; and

What are Supported Employment Services, Including the Reservation Requirement? (cont.)

- (C) consisting of— (i) a particularized assessment supplementary to the comprehensive assessment described in paragraph (2)(B);
- (ii) the provision of skilled job trainers who accompany the individual for intensive job skill training at the worksite;
- (iii) job development, job retention, and placement services;
- (iv) social skills training;
- (v) regular observation or supervision of the individual;

What are Supported Employment Services, Including the Reservation Requirement? (cont.)

- (v) regular observation or supervision of the individual;
- (vi) followup services such as regular contact with the employers, the individuals, the individuals' representatives, and other appropriate individuals, in order to reinforce and stabilize the job placement;
- (vii) facilitation of natural supports at the worksite;
- (viii) any other service identified in section 103; or
- (ix) a service similar to another service described in this subparagraph.

Tracking, Expending and Reporting Supported Employment Funds

When a VR Agency may Begin to Payment for Supported Employment Services

Because Title VI Supported Employment program funds, as well as VR funds used for the provision of supported employment services, are meant to be used to support and maintain an individual with a most significant disability in employment, the provision of supported employment services may not be provided prior to an individual being placed into an employment position requiring such services.

Tracking, Expending and Reporting Supported Employment Funds (cont.)

All Federal expenditures, including non-Federal expenditures used for match purposes, incurred during the provision of services to an individual that occur prior to the individual being placed into a supported employment position, must be provided under the VR program- not the Supported Employment program.

Tracking, Expending, and Reporting Supported Employment Funds (cont.)

Supported Employment Reservation and Expenditure of Funds Requirement

- The State must reserve and expend 50 percent of its Federal Supported Employment allotment for the provision of supported employment services, including extended services, to youth with the most significant disabilities. (Section 603 of the Act and 34 C.F.R. § 363.22)

Tracking, Expending and Reporting Supported Employment Funds (cont.)

Supported Employment Match Requirement

- The State must provide a match of at least 10 percent in non-Federal expenditures for the total amount of expenditures incurred with the funds reserved (i.e., half of the Supported Employment allotment) to provide supported employment services, including extended services, to youth with the most significant disabilities.
- Since the required non-Federal share is only applicable to the funds reserved for youth with the most significant disabilities, the non-Federal expenditures are required to be spent on supported employment services, including extended services, to youth with the most significant disabilities.

Tracking, Expending and Reporting Supported Employment Funds (cont.)

- In FFY 2018, for administrative purposes, RSA divided the supported employment allotment into separate grants each constituting 50 percent of the allotment
 - 84.187A –supported employment services as defined in 34 C.F.R. § 363.3(a); and
 - 84.187B – supported employment services to youth with the most significant disabilities, including extended services (34 C.F.R. § 363.3(b).
- The State’s supported employment allotment is considered the total of both those grants, and the State’s obligation to reserve and expend half of its grant on youth with significant disabilities continues regardless of whether the size of the total allotment increases or decreases, such as during the reallocation process.

Tracking, Expending and Reporting Supported Employment Funds (cont.)

- A State may spend its SE-A grant on youth with significant disabilities without matching that expenditure, but the State is still obligated to expend its SE-B grant on youth with significant disabilities and match at least 10 percent of the amount of the SE-B grant, by the end of the year of appropriation.

Tracking, Expending and Reporting Supported Employment Funds (cont.)

Because a State's Supported Employment allotment refers to the total amount of CFDA 84.187A and CFDA 84.187B funds awarded, the total allotment amount must remain balanced in order to comply with the statutory requirements for a State to reserve and expend funds for the provision of supported employment services for youth with the most significant disabilities and the requirement to provide match for the half of the Supported Employment grant funds reserved for youth with the most significant disabilities (50 percent of the total award, meaning the combined total of CFDA 84.187A and CFDA 84.187B).

Tracking, Expending and Reporting Supported Employment Funds (cont.)

In an effort to make it administratively easier for VR agencies to keep track of the half of the Supported Employment allotment that must be reserved and expended for the provision of supported employment services, including extended services, on youth with the most significant disabilities, as well as the amount that must be matched, RSA divided the Supported Employment allotment into two separate awards. However, this was an administrative action and does not mean that there are two Supported Employment allotments. As stated earlier, the total allotment is the combined total of both awards.

The amount of Supported Employment funds relinquished or requested will automatically be assigned 50 percent to CFDA 84.187A and 50 percent to CFDA 84.187B.

Tracking, Expending and Reporting Supported Employment Funds (cont.)

The amount of Supported Employment funds relinquished or requested will automatically be assigned 50 percent to CFDA 84.187A and 50 percent to CFDA 84.187B. In doing so, RSA ensures, for administrative purposes that the two awards remain balanced for ease of calculating the required match amount on half of the allotment.

Tracking, Expending and Reporting Supported Employment Funds (cont.)

- Due to the issuance of two separate supported employment awards (84.187A and 84.187B) in FFY 2018, States will need to submit separate SF-425s to reflect obligations and expenditures related to the separate requirements concerning each award.
- For FFY 2017, grantees are required to report supported employment expenditures using the current SF-425 (PD-15-06)
- Additionally, grantees are still required to report supported employment expenditures on the current RSA-2 and in the RSA-911.

Questions?

If you have any additional questions, please email them to RSAfiscal@ed.gov.

