# VR Standards for Providers Chapter 15: Pre‑Employment Transition Services

**Effective July 1, 2019**

Contract Type: Pre-Employment Transition Services

The contractor and contractor’s staff members who provide the services described in this chapter must also comply with Chapters 1–3 of this manual.

## 15.1 Overview of Pre-Employment Transition Services

Pre-Employment Transition Services (Pre-ETS) are provided to transitioning individuals who meet the definition of a "student with a disability."

Federal regulations at 34 CFR §361.5(51) define a "student with a disability" as:

" . . . an individual with a disability in a secondary, postsecondary, or other recognized education program who -

(A)(1) Is not younger than the earliest age for the provision of transition services under section 614(d)(1)(A)(i)(VIII) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)(1)(A)(i)(VIII)); or

(2) If the State involved elects to use a lower minimum age for receipt of pre-employment transition services under this Act, is not younger than that minimum age; and

(B)(1) Is not older than 21 years of age; or

(2) If the State law for the State provides for a higher maximum age for receipt of services under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.), is not older than that maximum age; and

(C)(1) Is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1411 et seq.); or

(2) Is a student who is an individual with a disability, for purposes of section 504."

In Texas, the relevant age range is 14–22 years old. For more information, refer to Vocational Rehabilitation Services Manual (VRSM) C-1300: Transition Services for Students and Youth with Disabilities.

All services included in a Pre-ETS contract must address one of the key categories defined in the Pre-ETS requirements under the Workforce Innovation and Opportunity Act (WIOA).

As set out in 34 CFR §361.48(a)(2), the five key Pre-ETS required categories are:

"(1) job exploration counseling;

(2) work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment to the maximum extent possible;

(3) counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;

(4) workplace readiness training to develop social skills and independent living; and

(5) instruction in self-advocacy (including instruction in person-centered planning), which may include peer mentoring (including peer mentoring from individuals with disabilities working in competitive integrated employment).”

## 15.2 Staff Qualifications

Before a provider is authorized to provide services to students, the provider must complete a VR3455, Provider Staff Information form for each staff member who will provide Pre-ETS training to students.

The VR3455 must document the staff member’s qualifications and provide evidence that the provider’s staff member meets all qualifications, including requiring the staff member to provide relevant documentation, such as transcripts, diplomas, reference letters, credentials, and licenses.

The individual designated as the director must also submit a VR3455 along with documentation that they hold a UNTWISE Director Credential. For more information, refer to Chapter 3: Overview of the Basic Standards.

All Pre-ETS trainers must meet the minimum qualifications of having earned the following:

* A high school diploma or General Educational Development (GED) certificate
* At least one of the following:
  + Two years of experience working with students with disabilities , as verified with pay statements or a letter of verification, and a minimum of 30 semester hours of college credit with a minimum of 15 semester hours in special education, specific disabilities, social work, counseling, business, or a related field
  + Sixty hours of college credit in special education, specific disabilities, social work, counseling, business, or a related field. Related fields must be approved by the statewide transition specialist.

Exceptions may be granted for an individual who does not meet the educational requirements above if the total of that individual's work experiences clearly demonstrates that he or she is experienced in working with individuals with disabilities, especially transition-age individuals with disabilities.

Exceptions to staff qualifications must be:

* documented in writing by the program manager for transition; and
* kept in the provider’s records.

To request a review of an individual's credentials and experience, send a request to the Pre-ETS mailbox at pre-ets@twc.state.tx.us.

## 15.3 Pre-ETS Service Description

When applying for a Pre-ETS contract, the provider indicates which of the five Pre-ETS categories the provider intends to provide. An executed contract for Pre-ETS indicates which of the five Pre-ETS categories the Texas Workforce Commission (TWC) has approved for the provider.

More than one Pre-ETS category may be listed on the same contract, but individual categories must adhere to the limits in this chapter. Exceptions to these limits must be approved by the director of TWC’s Vocational Rehabilitation (VR) division.

The five Pre-ETS categories are:

1. **Job exploration counseling**—may be provided in a classroom or community setting and include information on in-demand industry sectors and occupations, as well as nontraditional employment, labor market composition, administration of vocational interest inventories, and identification of career pathways of interest to the students. Job exploration counseling provided on an individual basis might be provided in a classroom or in the community and may include discussions on the results of the student’s vocational interest inventory and the in-demand occupations, career pathways, and local labor market data that apply to the student’s interests.
2. **Work-based learning**—may be offered in a group setting and may include a school-based program of job training and informational interviews to research potential employers, work site tours to learn about necessary job skills, job shadowing, or mentoring in the community. For information about services that allow a student to be placed in a paid or unpaid short-term experience, refer to Chapter 14: Work Experience.
3. **Counseling on post-secondary opportunities**—may include information on course offerings, career options, the types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with career fields or pathways. Counseling may include advising students and parents or representatives on academic curricula, college application and admissions processes, completing the Free Application for Federal Student Aid (FAFSA), and providing information on or access to resources that may support a student’s success in education and training, including support services for students with disabilities.
4. **Workplace readiness training**—may include programming to develop social and independent living skills, such as communication and interpersonal skills, financial literacy, orientation and mobility skills, job-seeking skills, understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment.
5. **Self-advocacy**—may include generalized classroom lessons in which students learn about their rights, their responsibilities, and how to request accommodations, services, and other forms of support needed during the transition from secondary to postsecondary education and employment.

Pre-ETS services are limited to the following:

* No more than 30 hours each for job exploration counseling, work-based learning, counseling on postsecondary opportunities, workplace readiness training, and self-advocacy, per state fiscal year.

When authorized by the VR counselor, the provider may provide up to the maximum number of hours per category per state fiscal year to provide the service.

The ratio of students to trainers must not be greater than six students to one trainer.

Items such as uniforms, transportation, and required tools and equipment may be authorized by the VR counselor to support a student’s participation in Pre-ETS training if such items are necessary and are supported by the documented employment goal. Items are considered on an item-by-item basis and may be provided only for students who have been determined to be eligible for VR services, not those who are receiving Pre-ETS as potentially eligible.

No supported employment assessments or benchmarks are included in Pre-ETS.

To change a Pre-ETS service description, process, procedure, or outcome required for payment, the VR division director must approve the VR3472, Contracted Service Modification Request form, before the change is implemented.

### 15.3.1 Similar Contracted Services

Vocational Adjustment Training (VAT) and Work Experience (WE), described in SFP Chapters 13 and 14, are also considered Pre-ETS when provided to students with disabilities. VAT and WE may be purchased as Pre-ETS.

When a provider holds a contract for VAT or WE, it is not necessary to also have a contract in place for Pre-ETS unless the way the service is being provided will fall outside the standards for those services.

Examples:

A provider wants to provide workplace readiness training and self-advocacy instruction to students, but the curriculum that the provider uses falls outside of the VAT policies. In this instance, a Pre-ETS contract would allow the provider to offer the service with the provider’s preferred curriculum. Note: All other standards outlined in this chapter must be met.

A provider wants to provide job exploration counseling, workplace readiness training, and work-based learning to students with disabilities. The provider wants to use a curriculum that falls outside of the VAT policies, and the provider does not have a contract for Work Experience. In this instance, a Pre-ETS contract would allow the provider to use their preferred curriculum and offer work-based learning using one contract.

A provider wants to provide instruction in work readiness and self-advocacy for two weeks and then place students in short-term employment to apply what they learned. In this case, the provider would need a Pre-ETS contract for work readiness and for self-advocacy and a work experience contract to place students in short-term employment.

Send questions related to the Pre-ETS standards to the Pre-ETS mailbox at vr.pre-ets@twc.state.tx.us.

### 15.3.2 Curriculum Requirements

Pre-ETS providers are permitted to choose their own curriculum or combine parts of different curricula containing one or more of the five Pre-ETS categories.

Each curriculum included in the training:

* must be designed for transition-age individuals, preferably with references to disabilities;
* must take into account cognitive ability and reading level, when targeting a specific disability group;
* must not be one of the curricula included in the policy on VAT published in Chapter 13: Work Readiness Services. If the curriculum is included in VAT, the provider must pursue a VAT contract.

When applying for a Pre-ETS contract, the provider must enter on the VR1825, Pre-ETS Curriculum Checklist, which is included in the application packet:

* information about the curriculum; and
* an outline of the training objectives for each curriculum being employed.

At times, a copy of the curriculum may be requested by the State Office Transition Team reviewing the packet.

Send changes to curricula that have already been approved to the Pre-ETS mailbox at vr.pre-ets@twc.state.tx.us.

## 15.4 Process and Procedure

Once the contract has been issued, the provider must receive a valid service authorization and a VR1824, Referral for Contracted Pre-ETS Services, for each student before providing services.

Services must be provided consistent with this chapter.

An accurate invoice is paid once the VR counselor has verified the student’s attendance and progress documented on the VR1823, Pre-Employment Transition Services (Pre-ETS) Progress Report.

## 15.5 Outcomes Required for Payment

Providers are paid only for time attended by students. For fewer than one hour, payment is rounded to the nearest quarter hour and prorated accordingly.

When multiple students attend, the provider submits a VR1823, Pre-ETS Progress Report for each student.

The VR1823, Pre-ETS Progress Report, must include evidence that:

* the training was provided without exceeding the ratio of one trainer to six students;
* the training was provided without exceeding the approved number of hours on the service authorization; and
* the student’s training included only Pre-ETS categories included in the contract, for example:
  + job exploration counseling;
  + work-based learning;
  + counseling on postsecondary opportunities;
  + workplace readiness training; and
  + self-advocacy.

Payment is made when the VR counselor approves a complete, accurate, signed, and dated:

* VR1823, Pre-Employment Transition Services (Pre-ETS) Progress Report; and
* invoice.

In addition to documenting attendance on the VR1823, Pre-Employment Transition Services (Pre-ETS) Progress Report, it is highly recommended the provider maintain sign-in sheets with each student’s signature in their own records.

## 15.6 Fees for Pre-Employment Transition Services

The base rate for Pre-ETS must not exceed $34.25 an hour per student for job exploration counseling, work-based learning, counseling on postsecondary opportunities, workplace readiness training, and self-advocacy.

The Pre-ETS activity description, including the rate, is printed on the service authorization.