# Vocational Rehabilitation Services Manual C-1300: Transition Services for Students and Youth with Disabilities

Revised July 1, 2022

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## **C-1305: Providing Transition Services**

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### **C-1305-6: Providing Pre-Employment Transition Services**

Under the Workforce Innovation and Opportunity Act (WIOA), vocational rehabilitation (VR) agencies are required to reserve and expend a minimum of 15 percent of their federal funding solely for pre-employment transition services (Pre-ETS).

Pre-ETS activities are provided to individuals who:

* meet the definition of a student with a disability; and
* are eligible or potentially eligible for VR services.

### **C-1305-7:Student with a Disability**

Based on federal regulations (34 CFR §361.5(c) (51)), in Texas, a student with a disability is defined as an individual between the ages of 14 [established by TWC and consistent with authority under 34 CFR §361.5(c) (51) (i)(A)(2)] and 22 who is:

* enrolled in a recognized educational program, which may include public schools (including charter schools), private schools, home schools, recognized post-secondary programs, or other recognized settings, such as the schooling provided by juvenile justice facilities;
* receiving services through the Individuals with Disabilities Education Act (IDEA) (Special Education); or
* considered eligible for Section 504 services (includes individuals who are receiving VR services).

Customers who meet the requirements above but who turn 22 years old before September 2 of the current fiscal year, no longer meet the definition of a student with a disability. For example, if a customer is 21 on September 2, he or she will meet the definition of a student with a disability until August 31 of the following year if he or she remains enrolled in a recognized educational program as described above. RSA provides the following guidance on what constitutes a recognized educational setting:

* Educational programming under the definition of a “student with a disability” would include programs that provide a recognized credential of education, such as a certified nursing assistant (CNA) program.

Graduating seniors in high school who will not be pursuing postsecondary training, or any other type of recognized educational program after high school, cease to meet the definition of a student with a disability upon graduation from high school; therefore, these individuals are not eligible for additional Pre-ETS. Graduating high school seniors who are attending postsecondary training or another recognized educational program in the subsequent fall term are still considered students with disabilities and remain eligible for Pre-ETS during the gap months of the summer, as long as they continue to meet the age requirement for a student with a disability. The following documentation should be used to document enrollment in a postsecondary program:

* Documentation that the individual with a disability graduated from secondary education
* Documentation that the individual with a disability has been accepted into a postsecondary educational institution or program
* Documentation of the individual's intention to enter the postsecondary institution or program or confirmation that he or she accepted the invitation to enter the postsecondary institution or program
* Documentation that the individual with a disability has been informed by the institution or program that a place is being held for the individual

Individuals who are eligible for VR but do not meet the definition of a student with a disability can receive individualized transition services and other VR services; however, they are not counted as recipients of Pre-ETS, and the services and goods must be paid for with Basic VR funds, not with Pre-ETS funds.

### **C-1305-8: Types of Pre-Employment Transition Services (Pre-ETS)**

The Workforce Innovation and Opportunity Act (WIOA) defines three types of Pre-ETS activities—required, coordinated, and authorized.

The five required Pre-ETS activities are as follows:

1. Career exploration counseling
2. Work-based learning experiences which may include in-school or after-school opportunities, or experiences outside the traditional school setting (including internships) that are 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
5. Instruction on self-advocacy, including peer mentoring

The four coordinated Pre-ETS activities are as follows:

1. Attending individualized education plan (IEP) meetings, when invited
2. Working with the Local Workforce Development Boards (Boards), Workforce Solutions Offices, and employers to develop work opportunities for students with disabilities
3. Working with schools to coordinate and ensure the provision of Pre-ETS
4. Attending, when invited, individual-centered planning meetings for students with disabilities who receive services under Medicaid (Title XIX of the Social Security Act)

The nine authorized activities are provided primarily by the VR state office and regional staff members; however, field staff may sometimes be asked to assist with these activities.

The nine authorized Pre-ETS activities are as follows:

1. Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces
2. Developing and improving strategies for individuals with intellectual disabilities and/or significant disabilities to live independently, participate in postsecondary educational experiences, and obtain and retain competitive integrated employment
3. Providing instruction to VR counselors, school transition staff, and others who support students with disabilities
4. Disseminating information about innovative, effective, and efficient approaches to achieving WIOA goals
5. Coordinating activities with transition services provided by local education agencies (LEAs) under IDEA (20 USC §1400 et seq.)
6. Applying evidence-based findings to improve policy, procedure, practice, and staff preparation to achieve WIOA goals
7. Developing model transition demonstration projects
8. Establishing or supporting multistate or regional partnerships that involve states, LEAs, designated state units, developmental disabilities agencies, private businesses, and other participants to achieve WIOA goals
9. Disseminating information and developing strategies to improve the transition to postsecondary activities for individuals who are members of traditionally unserved populations

In the final WIOA regulations, the RSA clarifies that Pre-ETS is a set of services intended to occur in the earlier phases of the career exploration and work preparation continuum. This is important to remember, as Pre-ETS can be provided or purchased for students with disabilities at any point in the VR process. For students who reach active services status, Pre-ETS activities must be based on the needs identified in the IPE. The primary focus is on experiences and learning opportunities for students with disabilities. While Pre-ETS required and coordinated activities can be provided in many phases of the VR process, Pre-ETS funds may not be used to provide services in the employment or post-employment phases of the VR process.

### **C-1305-9: Funding**

Purchases for customers and students are made with either Basic VR or Pre-ETS funding, depending on the type of purchase. The [Pre-ETS Desk Aid](https://intra.twc.texas.gov/intranet/vrs/html/transition.html)provides additional explanation and guidance on what is funded by Basic VR and what may be funded by Pre-ETS, tracking Pre-ETS time, and capturing Pre-ETS provided directly by counselors (at no cost). For eligible students receiving VR, it is also important to note that it may be necessary to access both Pre-ETS funding and Basic VR funding. Staff members are encouraged to use both types of funding to help the student achieve his or her vocational goal. For example, an eligible VR student is participating in a workplace readiness activity but needs hearing aids to ensure effective communication. Pre-ETS funds may be used to pay for the workplace readiness activity but not the hearing aids, because Pre-ETS cannot fund personal assistive devices. Basic VR would pay for the hearing aids. In February 2020, the Rehabilitation Services Administration (RSA) published a policy clarification that provided additional flexibility to states to allow the use of Pre-ETS funds for certain support good and services for students with disabilities who have been determined eligible for VR services. The same support services may not be purchased with Pre-ETS funds for potentially eligible students. For more information, please see the Pre-ETS Desk Aid, referenced above, or email the [VR Pre-ETS mailbox](mailto:vr.pre-ets@twc.texas.gov).

Examples of these services include:

* transportation,
* maintenance,
* assistive technology,
* job skills training,
* personal attendant services,
* assessments, and
* food and lodging when it supports participation in a residential Pre-ETS program.

This flexibility to use Pre-ETS funding for supporting goods and services is not applicable for potentially eligible students.

Staff salaries are paid by Basic VR or Pre-ETS funding, depending on the activities that staff members perform. For example, if a transition vocational rehabilitation counselor (TVRC) provides a required or coordinated Pre-ETS activity to an eligible or potentially eligible student with a disability, then the TVRC documents the time spent providing the service, including related travel time, in the TWC Time Tracking System (TTS). Additionally, if any VR staff member participates in an authorized Pre-ETS activity, that time also must be documented in TTS; it should be noted that all related travel time and costs for participating in authorized Pre-ETS activities must be charged to Basic VR and not to Pre-ETS. For additional information and guidance, see the [Pre-ETS Desk Aid: Pre-ETS Time Tracking Guidance](https://intra.twc.texas.gov/intranet/vrs/docs/pre-ets-deskaid-1-time-tracking.docx).

When uncertainty exists about whether to enter an activity into TTS, staff consults with the VR supervisor or submits an inquiry to the [VR Pre-ETS mailbox](mailto:vr.pre-ets@twc.texas.gov).

### **C-1305-10: Working with Potentially Eligible Students**

To receive Pre-ETS and be considered potentially eligible for VR services, an individual must meet only the definition of a student with a disability. The individual does not have to apply for VR services, unless the individual chooses to do so. The purpose of the potentially eligible designation is to give more students with disabilities the opportunity to participate in Pre-ETS. VR requirements are only applied for services provided to VR-eligible customers. The only VR requirements that are applied to potentially eligible individuals are informed choice, confidentiality, and access to the client assistance program (34 CFR §361.38, §361.52, and §361.56). Potentially eligible students are not subject to Basic Living Requirements or other cost sharing requirements.

Note: Potentially eligible services may be authorized only on a multicustomer service authorization (MCSA). There is the potential for a single customer to be on an MCSA if it is for an independent, stand-alone service. For more information on MCSAs, refer to [VRSM D-213-5: Multicustomer Purchases](https://twc.texas.gov/vr-services-manual/vrsm-d-200" \l "d213-5).

Students who are potentially eligible may receive a single Pre-ETS or multiple Pre-ETS according to their need and desire to participate. Providing or purchasing Pre-ETS for potentially eligible students is not intended to be an avenue to circumvent the VR process, and at some point, a potentially eligible individual may need VR services that Pre-ETS cannot fund, such as durable medical equipment or tuition. Generally, and as a best practice after the provision or purchase of a Pre-ETS, the TVRC or VR counselor assigned to a potentially eligible case as the point of contact should counsel and provide the student with appropriate information related to the following options:

* The individual may continue as a student who is potentially eligible and able to access additional Pre-ETS;
* The student may apply for the full array of VR services, which include additional Pre-ETS and Transition services, as needed; or
* The VR counselor may close the case if the student does not wish to access additional Pre-ETS or to apply for additional VR services.

To access VR services, a potentially eligible individual must apply for VR, be determined eligible, and have an IPE for provision of the additional VR services.

As long as the individual meets the definition of a student with a disability, the individual will continue to be potentially eligible until the age requirements are exceeded or the individual applies for VR services and eligibility is determined. If a potentially eligible student has completed the VR application process and has been determined ineligible, the provision of Pre-ETS stops, and he or she is no longer considered potentially eligible.

WIOA requires VR to document specific data (listed below) for anyone receiving Pre-ETS. This requirement differs, depending on whether the customer has been determined to be potentially eligible or eligible for VR. The data required for a student with a disability who is requesting or participating in Pre-ETS activities and has not applied for VR services can be captured on the [VR1820, Request to Receive Pre-Employment Transition Services](https://twc.texas.gov/forms/index.html) form, which includes fields for entering the student's:

* Social Security number (preferable if available) or another unique identifier such as a student school identification number, a state-issued identification card number, or driver's license number;
* date of birth;
* race (required if student is in secondary education);
* ethnicity (required if student is in secondary education); and
* student's disability (as indicated in supporting documentation listed below).

Applicable release forms must also be obtained to allow the exchange of information and establish parental permission to participate in services.

The completed VR1820 and release forms paired with verification of disability from the list below completes the paperwork needed to begin providing Pre-ETS. Supporting documentation that is required to verify the student's disability may include the following:

* Case notes documenting VR counselor observations, review of school records, and statements of education staff
* A signed statement from a school professional with the identification of a student's disability and school enrollment status (A template of the VR Disability Verification Letter is available to capture this information.)
* A copy of an IEP, Social Security Administration (SSA) beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination, or documentation relating to Section 504 accommodations

Note: When a potentially eligible student is participating in a work placement as part of work-based learning, whether paid or unpaid, the requirements established in [B-204-2: Customer Identification and Authorization for Employment](https://twc.texas.gov/vr-services-manual/vrsm-b-200#b204-2) for documentation of legal status to work in the United States must be met. However, for all other Pre-ETS activities, only the information listed above and found on the VR1820 is required for potentially eligible students.

An activity is considered a work placement when it is treated as an employment relationship and when paperwork (for example, Form I-9, Employment Eligibility Verification (I-9)) becomes part of the process.

Examples of work-based learning placement include:

* internships
* apprenticeships
* volunteer opportunities where the employer requires paperwork
* placements through Paid Work Experience or Work Experience

Other activities that would normally be considered work-based learning but do not require that an employment relationship be established are allowable for potentially eligible students who do not have employment authorization documents. Some typical examples are:

* job shadowing;
* informational interviews; and
* tours of businesses.

For information about paper case file requirements for potentially eligible students, refer to [D-303-1: Two Sided or Six-Sided Case Files](https://twc.texas.gov/vr-services-manual/vrsm-d-300#d303-1).

The TVRC or VR counselor assigned to the potentially eligible case must enter case notes in RHW that document information about the student, justification for services, progress, and outcomes. This may be one case note or multiple as the counselor continues to work with the student. Topics that must be documented, when applicable, are:

* a description of the disability, functional limitations, and counselor observations;
* a record of the disability from the student’s perspective;
* counseling and guidance and other Pre-ETS provided directly by the VR counselor;
* a service justification case note that indicates the planned services, including the type of, and rationale for, Pre-ETS; and
* the skills gained, as well as other progress made by the student as a result of receiving Pre-ETS.

VR counselors can enter data for and track potentially eligible students as well as issue payment for purchased Pre-ETS in ReHabWorks (RHW). For additional assistance and guidance on purchasing for potentially eligible students, see the [Pre-ETS Desk Reference 2.](https://intra.twc.texas.gov/intranet/vrs/docs/pre-ets-deskaid-2-purchasing.docx)

### **C-1305-11: Capturing Pre-Employment Transition Services Activity in ReHabWorks**

In addition to tracking preemployment transition services (Pre-ETS) staff time and funding, it is essential to capture and document the number and type of substantial Pre-ETS being provided to each student by entering in ReHabWorks (RHW) a provided services service record (SR) or a Pre-ETS activity record for provided, arranged, and purchased Pre-ETS. For guidance on these processes, please see the [Pre-ETS Desk Aid: Tracking Pre-ETS](https://intra.twc.texas.gov/intranet/vrs/docs/pre-ets-deskaid-3-tracking-vr-services.docx) and the Guide for Creating Pre-ETS Activity Records.

An SR for provided Pre-ETS should be entered and used only by the in-house VR staff, such as vocational rehabilitation teachers, employment assistance specialists, and orientation and mobility instructors, who typically serve blind and visually impaired students. VR counselors and transition VR counselors (TVRCs) should not use the SR tracking method and instead should capture and track all Pre-ETS (arranged, provided, and purchased) via the Pre-ETS Activities functionality in RHW.

For example, when a TVRC provides career exploration counseling to a student during a counseling and guidance session, the Pre-ETS Activity functionality in RHW should be used. For more information and examples of entering Pre-ETS activity records, see the Guide for Creating Pre-ETS Activity Records.

For in-house providers, more information, and examples of entering provided Pre-ETS SRs, see the [Pre-ETS Desk Aid](https://intra.twc.texas.gov/intranet/vrs/html/transition.html).

### **C-1305-12: Case Note Documentation**

Case notes for students who receive transition services must also include the following components unique to transition services:

* Documentation of career exploration activities
* Family involvement in making informed choices
* Collaboration with school partners
* Use of comparable benefits provided by the school or other partners

When documenting Pre-ETS in a RHW case note, select the appropriate topic (such as Counseling and Guidance or Service Justification) and check the "Pre-ETS" box.

For additional information about required documentation, refer to [E-300: Case Note Requirements](https://twc.texas.gov/files/partners/vrsm-e-300.docx).

### **C-1305-13: Group Skills Training**

At times, it is more effective for the student and more efficient for the program to bring groups of individuals with disabilities together to teach a set of vocational skills. These activities are known as Group Skills Training (GST) and are intended specifically for students with any disabilities (see 34 CFR §361.5(c) (51)). A GST has an agenda, defined start and end dates, and specific learning objectives. For every GST, VR staff must be able to clearly state what the students will learn and be able to accomplish after participation.

GST sessions focus exclusively or primarily on providing one or more of the following five required Pre-ETS activities (34 CFR §361.48(a)(2)):

* Job exploration counseling
* Work-based learning experiences, such as in-school or after-school opportunities, or experiences offered outside of traditional school settings (including internships), in an integrated environment to the maximum extent possible
* Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs
* Workplace readiness training to develop social and independent living skills
* Instruction in self-advocacy, which may include peer mentoring

GST sessions are designed by VR staff and often include multiple Pre-ETS. They may be conducted by VR staff and may also include other providers, such as an employment services provider (ESP). Often, a GST requires multiple types of purchases, and staff must follow all applicable procurement and purchasing requirements. For example, an ESP, an external speaker, and lodging each entail different purchase requirements.

Note: When purchasing Work Experience Services through an ESP, transition educator, or a nontraditional provider for a student participating in a GST, the Work Experience Plan does not have to be completed.

To the greatest extent possible, each GST must be designed to maximize use of Pre-ETS funds and minimize the need for Basic VR funds. For example, a day program that is focused primarily on delivery of Pre-ETS activities and that uses facilities that VR can obtain at no or minimal cost maximizes use of Pre-ETS funding. It is acceptable for a combination of eligible and potentially eligible students to participate in GSTs. However, when potentially eligible students are participating, purchases for those students are limited to those allowed under the required Pre-ETS listed above. For VR eligible students, some additional VR services, like transportation, lodging, and maintenance associated with the GST are allowable for Pre-ETS funding.

Contracts may also be required for some GST activities, requiring staff to plan for GST sessions several months in advance to allow sufficient time for procurement, planning, and obtaining required approval. Partners may include education service centers, local colleges, Workforce Solutions Offices, Boards, the Texas School for the Blind and Visually Impaired, the Blind Children's Program under HHSC, Texas School for the Deaf, and other entities.

Each GST must have clear vocational goals with associated objectives to demonstrate how the activity will meet the goals.

For example, if the GST provides workplace readiness training, the objectives may include:

* developing the orientation and mobility required to navigate a city to reach a postsecondary school;
* developing communication skills, including appropriate interpersonal skills;
* attending team-building exercises in which individuals with different personalities are required to work together to create a product or achieve a result; and
* learning about appropriate work attire and etiquette.

A GST must not be a solely or predominantly social or recreational event, and the following training activities may be part of a GST but are not GSTs when provided as stand-alone trainings:

* A mini-immersion training conducted by the Criss Cole Rehabilitation Center
* Classes provided by VR teachers
* Training activities provided by an ESP, such as Project Search, Vocational Adjustment Training, Personal Social Adjustment Training, or those provided through a Pre-ETS contract

When a GST is conducted over several days or weeks, periodic recreational activities may be proposed to facilitate customer interaction and further prepare the student for the workplace (for example, focusing on social interaction, being comfortable in new environments and situations, promoting leadership and problem-solving activities during team-building exercises, and emphasizing the importance of collaboration).

To the extent possible, recreational activities for students who are blind or visually impaired may be designed using the approach known as Structured Discovery Cane Travel (SDCT), as well as other methods that challenge the participants. SDCT instruction includes nonvisual techniques, problem-solving strategies, experiential learning, and confidence-building experiences.

Eligible students who attend a GST must have goals in their IPE that make participation in the specific GST necessary for their vocational development. If goods and services other than the required Pre-ETS activities must be purchased for the eligible student to participate in the GST, those purchases must be:

* documented in the student's IPE;
* necessary to perform the actual activity or task, or to achieve the goal of the GST; and
* reasonable, meaning that the cost does not exceed fair or market cost for purchases made under the same or similar circumstances.

In short, the purchase of food, transportation, lodging, clothing, or backpacks (or similar types of purchases) for any GST must be necessary and reasonable.

These supporting goods and services are allowable Pre-ETS expenditures for VR eligible students only.

If it is advisable for students to wear a T-shirt that identifies them with a VR group when students participating in a GST are in a public setting, the T-shirts must be reasonably priced and must be plain, as the additional cost of printing on the shirts is not permitted. The purchase of T-shirts must follow all applicable procurement and purchasing requirements, and documentation must be retained to justify the purchase.

For information on purchasing food, refer to [D-213-6: Food Purchased for Customer Training](https://twc.texas.gov/vr-services-manual/vrsm-d-200#d213-6).

**Planning a Group Skills Training**

Planning is essential for developing and providing a high-quality GST for students. The [Pre-ETS Group Skills Training (GST) Template](https://intra.twc.texas.gov/intranet/vrs/docs/pre-ets-group-skills-training-template.docx) for Group Skills Training proposals is available to assist staff and to facilitate the management approval process.

While it is expected that most GSTs proposed by staff will be accommodated by the template, staff may alter the template to propose other types of training if:

* the proposed GSTs meet all requirements established in policy; and
* all required elements of the template remain

When completing a GST template, staff may refer to examples of activities provided by the [Workforce Innovation Technical Assistance Center: What are the required Pre-Employment Transition Services?](http://www.wintac.org/topic-areas/pre-employment-transition-services#required_preemployemnts)

**Group Skills Training Application, Review, and Contract Processes**

The GST application, review, and contract processes are as follows:

1. Each August, the VR state office provides to VR field staff a list of the approved GSTs from earlier in the fiscal year. VR staff members review the list, discuss with the relevant VR Manager the GST proposals that are being submitted for consideration in the upcoming fiscal year, and provide an initial response with Regional Director approval to the VR state office's list by September 15. If more than one region is involved, all RDs should provide approval.
2. For new and repeating GST activities, designated VR state office staff members review the proposal to ensure compliance with policy and submit the template and supporting documentation to the VR deputy division director for Field Services Delivery and the VR director.
3. The VR deputy division director for Field Services Delivery and the VR director review the proposed GST. When necessary, the VR director consults with executive management before approving the GST.
4. The VR deputy division director for Field Services Delivery notifies the regional director as to whether the GST proposal has been approved.
5. The regional director notifies the VR Manager.
6. The VR Manager ensures that designated VR staff implements the GST as approved and follows all required policies and procurement processes.
7. VR staff must have approval for a GST before goods and services are procured, before contracts are developed, and before commitments are made to students, families, and potential partners.

If a student from one unit or region can benefit from participating in a GST that is planned by another unit or region, the student's VR counselor must hold a staff meeting with the other appropriate unit or regional staff to discuss the activity and coordinate participation for the student. In some cases, the requesting VR counselor’s participation in the GST may be necessary; this participation is contingent on approval from the RD if travel is required outside the region.

VR Managers and Regional Directors are responsible for ensuring that GST proposals are complete, accurate, and fully compliant with policy before submitting them to State Office for review and approval.

After a GST is conducted, the VR Manager is also responsible for reviewing the GST budget and planned activities to evaluate whether the activities were effective and well executed, whether the participants achieved the learning objectives, and to compare budgeted versus actual costs. The VR Manager should document the results of the review, retain them for future GST planning, and provide them to TWC and regional management upon request.

**Approval Time Frames**

If all required information is included in the initial submission, a GST may be approved by the VR Division Director within two weeks of submission to the Pre-ETS mailbox. If information is incomplete, inaccurate, or not compliant with policy, the approval process will be delayed until the proposal is revised to meet all requirements.

Staff submits GST proposals as far in advance of the proposed GST as possible. Where contracts must be executed, the contracting process must follow approval of the GST by executive management. Staff must allow at least four months for the contract development and execution process.

**Family Member Participation**

Depending on the goals of the GST, participation by parents or guardians may be essential for the student to receive the benefit of the training activities.

Family members may participate in GSTs when:

1. the GST activities are designed to include the parents or guardians as part of the skill attainment process during the GST and thereafter;
2. the primary purpose of the GST is to provide education, training, and resources to the student and parents and/or guardians; or
3. the parent must attend to provide attendant care for a student who requires such care to participate.

If a parent's and/or guardian's participation is necessary for a GST, the TVRC and VR Supervisor must:

* consider whether more than one parent or guardian is needed to participate; and
* justify the need in the program description.

Another family member may participate in the GST in place of the parent or guardian.

**Budget**

The VR Manager must consider the anticipated costs associated with a GST and develop a proposed budget. Most of the proposed costs would be attributed to Pre-ETS. When necessary, the budget may contain supporting costs attributed to either Pre-ETS or Basic VR. The proposed budget on the GST template identifies which costs are attributed to Pre-ETS and Basic VR.

**GST Site**

Facility and room rentals, as standalone purchases, are typically not allowable Pre-ETS expenditures. All GST sites must be accessible, according to the standards established by the Americans with Disabilities Act (ADA). When a contract or written agreement is required to rent a room or facility, all approval and procurement processes must be followed.

**Contracts**

Contracts that are necessary for one or more GST activities must:

* be developed with and approved by TWC Procurement and Contract Services; and
* comply with TWC policy and state and federal law.

The VR Manager must ensure that at least four months are allowed for the contract development and execution process.

**Lodging**

Lodging costs are only an allowable Pre-ETS expenditure for VR eligible students, so GST activities should be planned only when it is reasonable and necessary for participation.

When lodging is necessary for the GST, and family member participation is also proposed, the VR Manager must carefully consider whether it is necessary for more than one family member to participate.

The VR Manager must also consider that it is generally easier to supervise students in camp or dormitory settings rather than at a hotel. If more than 10 hotel rooms are needed, the VR Manager must first obtain approval from the VR Division Director and then coordinate with TWC Conference Planning at [ConferencePlanning.Media@twc.texas.gov](mailto:ConferencePlanning.Media@twc.texas.gov).

**Materials**

The VR Manager must allow sufficient time for the approval, printing, and mailing of outreach and other materials necessary for the GST. Materials such as brochures and flyers must provide all essential information. Applications must include mandatory signatures. All printed materials must be provided in an accessible format.

Staff must follow the External Publications and Procedures guidelines found on the [VR Standard Operating Procedures intranet page](https://intra.twc.texas.gov/intranet/vrs/html/vr-standard-operating-procedures.html).

**External Presenters and Contributors**

When external presenters and contributors of in-kind resources (such as free lodging or meeting space) are an option, presenters or vendors must be approved through TWC Conference Planning at [ConferencePlanning.Media@twc.texas.gov](mailto:ConferencePlanning.Media@twc.texas.gov).

Gifts or donations valued at $500 or more must follow TWC's procedures for the acceptance of gifts. Refer to [Section 1.9 of the TWC's Personnel Manual](https://intra.twc.texas.gov/intranet/manuals/hr/ch1.pdf#page=32)regarding Ethics/Standards of Conduct for more information related to gifts made to a TWC employee.

**Partners**

The VR Manager must allow sufficient time to work with partners who may be part of the GST. Regardless of who the partners are, the GST must meet the requirements of this policy and must focus predominantly on required Pre-ETS activities.

**Consent Forms**

For students applying to participate in a Pre-ETS GST, the [VR1827, Medical Information and Consent to Participate](https://intra.twc.texas.gov/intranet/gl/html/vocational_rehab_forms.html) form should be used to capture the following with their application:

* Permission to participate signed by a parent or legal guardian
* A signed emergency medical release
* Emergency contact information
* Written permission for transporting the student, if relevant

Providing a photograph of the student is optional.

If the GST is to be held overnight, students must include the following information on the [VR1827, Medical Information and Consent to Participate](https://intra.twc.texas.gov/intranet/gl/html/vocational_rehab_forms.html) form, when applicable:

* A list of the medications that the student takes
* A statement from the student, parent, guardian, or a doctor indicating whether the student can monitor his or her own medication
* Information about the student's medical conditions
* A list of the student's allergies (medication- or food-related)
* A statement that explains the relevance of the GST to the student's IPE

**Student Safety and Supervision**

The VR Manager must ensure that there is a safety system to ensure that all students are accounted for and are transported safely. For example, the VR Manager may:

* hire a security guard, nurse (for example medication assistance), certified life guard, or licensed commercial driver, if a TVRC determines that there is a need; or
* make cell phones available in vehicles that transport students.

The amount of adult supervision needed varies depending on the type of event and the needs of the students. When a training activity does not include parents, at least one adult must be in attendance for every six adolescent students. In some circumstances, there may be a need for a higher staff-to-participant ratio.

**Post-Group Skills Training Follow-Up**

Once the training is completed:

* the VR counselor documents the student's participation and the GST training activities in a case note in RHW and explains how the GST is meeting the student's needs;
* the VR Manager reviews the GST to:
  + evaluate whether the activities were effective and well-executed;
  + evaluate whether the participants achieved the learning objectives; and
  + compare budgeted versus actual costs.
* the VR Manager must document the results of the review, retain them for future GST planning, and provide them to VR regional management upon request.
* The VR State Office may request from VR regional management a summary of activities in their region annually.

**C-1305-14: Dual Credit Courses**

Dual credit offers high school students at select high schools the opportunity to participate in college coursework while enrolled in high school. These students can earn up to 60 college credit hours. The list of approved high schools can be found on the [Texas Education Agency (TEA) website](https://tea.texas.gov/ECHS/). Comparable benefits should be considered before sponsorship for dual credit is purchased. Comparable benefits may include funds available through the school.

Early College High Schools:

* may provide dual credit at no cost to students;
* offer rigorous instruction and accelerated courses;
* provide academic and social support services to help students succeed;
* increase college readiness; and
* reduce barriers to attending college

Because students are concurrently attending high school and college courses, it is normal for these students to be carrying less than a full-time course load.

**C-1305-15: Temporary Learning Experience**

Temporary learning experiences include Pre-ETS funded activities such as camps, seminars, workshops, and conferences. For temporary learning experiences, submit information about the activity to [VR.Pre-ETS@twc.texas.gov](mailto:vr.pre-ets@twc.texas.gov). A contract will be required with the provider if the costs related to an approved Temporary Learning Experience exceed $10,000. For more information, refer to [VRSM D-209: Types of Purchases](https://twc.texas.gov/vr-services-manual/vrsm-d-200" \l "d209)**.**

**C-1305-16: Camps**

Camps can increase a student's self-confidence by providing opportunities for the student to participate in challenging activities. Camps generally focus on career exploration activities or increasing the student's vocational and work readiness skills to prepare the student for other VR services in the future. Each camp must have clear vocational goals with associated objectives to demonstrate how the activity will meet the goals. A camp must not be a solely or predominantly social or recreational event.

Camp-related expenses can include costs that are considered Pre-ETS (such as career exploration) as well as related costs that are also considered Pre-ETS (such as travel, room, and board) for VR eligible students.

**C-1305-17: Workshops and Seminars**

Seminars and workshops may be held for a few hours or a few days.

Topics may include focus areas such as making the transition from school to work, driving with low-vision aids, succeeding in college, and the services provided by guide dogs.

Depending on the subject, the topics may or may not be considered Pre-ETS.

**C-1305-18: Pre-ETS as a Contract Type**

Pre-ETS as a contract type allows a provider to combine the five required Pre-ETS, within certain parameters, when doing so does not meet the standards for other contracted services. For more information about Pre-ETS contracts, please see [VR-SFP Chapter 15: Pre-Employment Transition Services](https://twc.texas.gov/standards-manual/vr-sfp-chapter-15).

## **C-1306: Pathways to Careers Initiatives**

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### **C-1306-5: Paid Work Experience**

Paid Work Experience (PWE) is intended to increase work-based learning opportunities through Texas' integrated workforce system for VR participants who are students with disabilities.

TWC has executed fee-for-service contracts with the Boards to purchase wage payment services for students in PWE. PWE placements are for eligible or potentially eligible individuals who are students with disabilities. If the customer has been determined eligible, PWE is an identified service on the IPE. For those who are potentially eligible, the point of contact must enter a case note that the service was purchased with a multi-customer service authorization. PWE, described in [Board VR Requirements Chapter 2: Wage Services for VR Participants in Paid Work Experience](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience), is a standalone service that is separate from the SEAL program. For more information on multicustomer service authorizations, refer to [VRSM D-213-5: Multicustomer Purchases](https://twc.texas.gov/vr-services-manual/vrsm-d-200" \l "d213-5).

PWE is available throughout the year and is authorized by VR counselors on an individual basis. Chapter 2 of the Board VR Requirements Manual describes the scope of work, responsibilities, deliverables, and payment structure for PWE services.

Through PWE services, Boards pay students' wages for time worked, thereby enabling students to be paid as they develop work skills that improve their career preparation and increase their employability.

Students are placed at the work site by TWS-VRS, which is responsible for monitoring each work site, providing case management, and providing counseling and guidance, as needed. TWS-VRS staff are responsible for ensuring completion of a work site agreement before the start of all PWE assignments. The work site agreement may be completed by TWS-VRS staff (or a contracted ESP, if applicable).

Form I-9 is used to verify the identity and authorization for employment of individuals who are hired in the United States. TWS-VRS staff may help students prepare the I-9. TWS-VRS staff members may sign the I-9 as a preparer or translator; however, they must be aware that they are attesting under oath that they have helped to complete the form and that, to the best of their knowledge, the information is true and correct. The Board or the Board contractor, whichever will be the employer of record, completes and signs the employer section of the I-9 before employment commences.

PWE assignments may not exceed 12 weeks per student per work site assignment (see [VRSM C-421: Work Experience Services](https://twc.texas.gov/vr-services-manual/vrsm-c-400#c421)). Paid work-experience assignments may not exceed 20 hours per week per student. A student may be either an eligible VR customer or a potentially eligible customer participating in the work experience service. If the VR counselor determines that additional assignments will help a student with career exploration and development of work readiness skills, the student may participate in more than one PWE assignments.

Participation in PWE and WIOA Title 1 programs such as WIOA youth program work experiences is permitted. VR and Workforce Solutions Office staff must ensure that the services that are provided are complementary and not duplicative, and that both sets of services are documented in the student's RHW case, indicating which are purchased and which are arranged.

#### **Staff Roles and Responsibilities for Paid Work Experience**

TWS-VRS field staff are responsible for:

* Developing paid work-experience opportunities, placements, and work sites in the public and private sectors. TWS-VRS complies with the Board's exclusions and exceptions to the type of work sites or businesses. TWS-VRS staff is permitted to coordinate with each Board or contractor staff to identify work sites with which the Board has existing relationships.
* Participating in an initial orientation and coordination meeting with the Board and/or, as applicable, the Board's contractor, before initiating work experience services. TWS-VRS staff participation in the orientation meeting is determined by VR regional management.
* Purchasing work experience services from a TWC VR contracted Employment Services Provider (ESP) based on the significance of a student's impediments to employment and associated support needs. For additional information about work experience services delivered through an ESP, refer to [VR Standards for Providers (VR-SFP) Chapter 14: Work Experience Services](https://twc.texas.gov/standards-manual/vr-sfp-chapter-14). ESPs do not provide wage payment services.
* Assisting the student with preparing any required I-9 paperwork. TWS-VRS staff may sign the I-9 as a preparer or translator; however, staff must be aware that they are attesting under oath that they have assisted in the completion of the form and that to the best of their knowledge the information is true and correct.
* Notifying Board staff or designated Board contractor staff of worksite incidents involving injury, property damage, or behavioral concerns that result in termination of the student's placement at the worksite as soon as possible and not later than 48 hours after the incident.
* Issuing a service authorization to the Board or designated Board contractor, authorizing Board payment of wages for a student (eligible or potentially eligible). With the service authorization, TWS-VRS staff includes a VR1990, Paid Work Experience Worksite Agreement. The work site agreement provides the following information:
  + Student's name
  + RHW Case ID
  + Name and physical address of the work site
  + Name of designated work site supervisor or contact person who will be responsible for signing or certifying the student's timesheets
  + Contact information for the designated work site supervisor or contact person
  + Work experience begin and end dates
  + The student's projected work experience schedule
* Providing additional documentation or information as agreed and documented in the local coordination and referral procedures established by the Board and TWC-VR as described in [Board VR Requirements Manual, Section 2.3.3 Paid Work Experience Eligibility](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience#s02.3). TWS-VRS staff must ensure that releases are completed before releasing confidential information.
* Timely processing of service authorizations and invoices from Boards. Payment is made to Boards for wages paid for actual time worked at the work site and for the other costs associated with payroll, including federal income tax withholding, Federal Insurance Contributions Act (FICA) expenses, workers' compensation insurance, and fees associated with payroll processing as described in the [Board VR Requirements Manual Chapter 2: Wage Services for VR Participants in Paid Work Experience](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience).
* Determining eligibility for participation in PWE services.
* Obtaining documentation and verifying that potentially eligible individuals meet the "student with a disability" definition. VR counselors must follow VRSM C-1305-10 regarding potentially eligible individuals.
* Providing case management services.
* Tracking the PWE to ensure that it does not exceed 20 hours per week and is not more than 12 weeks in duration

Boards are responsible for the following:

* Setting an hourly wage rate for the PWE component that is consistent with or based on the hourly wage the Board uses for PWE under the WIOA Title 1 Formula Youth Program. Wages must be paid in a timely manner and include the other costs associated with payroll processing.
* Notifying VR of the hourly wage rate that will be paid to students in PWE within 30 days of contract execution. They must include in their notification a description and breakdown of the other costs associated with payroll as described in [Board VR Requirements Manual, Section 2.5.1 Allowable Costs](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience#s02.5).
* Notifying VR of the name and contact information of the contractor when contracting with another entity to perform all or part of the PWE services deliverables.
* Notifying VR of exceptions or exclusions to the type of work sites or businesses that may serve as a work site.
* Notifying VR 30 days in advance of changes in the Board's contractor, hourly wage rate, or other payroll costs, and of exceptions or exclusions to the type of work sites or businesses. If such changes are made, the hourly wage rate for a student may not be reduced during the student's PWE assignment.
* Conducting an orientation meeting with VR regional management before initiating PWE services. The orientation meeting must include the Board's contractors, if such contractors will perform functions under [Board VR Requirements Manual, Chapter 2: Wage Services for VR Participants in Paid Work Experience](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience). The purpose of the meeting is to:
  + identify points of contact for the Board, Board contractors, and VR;
  + review the Board's hourly rate and associated payroll costs;
  + review the Board's exceptions and exclusions to the types of businesses or work site, if applicable; and
  + establish procedures to facilitate local coordination and referral, including the information and documentation (I-9 and W-2 forms) that are necessary to permit a customer to receive wages (the Board must document the procedures and provide a copy to VR).
* Maintaining records for the participants, wages paid, and associated fees for PWE services.
* Submitting a complete invoice for payment, along with supporting documentation. Boards may invoice VR weekly, biweekly, or monthly based on the Board or Board contractor's payroll cycle or other billing cycle. TWC will make payment by direct deposit to each Board's account.
* Boards may refer potential students to TWC-VR and should provide appropriate referral documentation when doing so.

#### **Purchasing Paid Work Experience**

Specifications for PWE can be found in RHW under Pre-Employment Transition Services. RHW contains a set of specifications for each of the six VR regions, which include the 28 workforce areas. Level 4 specifications have rates specific to each Board. If the Level 4 specification does not show a unit rate for the Board, VR staff submits an email message to the [Pre-ETS mailbox](http://mailto:VR.Pre-ETS@twc.texas.gov/).

The unit cost for student wages is the hourly wage rate paid to the participant plus required taxes and insurance, plus processing and invoice fees. The wage service rates for each Board have been setup in RHW. For the payroll processing fee, setup fee, or invoice fee, VR staff must enter this information into RHW manually when building the service record. VR staff must know the number of pay periods that will take place during the service to enter the accurate fees for payroll processing. For additional information, refer to [Board VR Requirements Manual, Section 2.5.5 Paid Work Experience Services Cost Calculations](https://twc.texas.gov/partners/board-vr-requirements/paid-work-experience#s02.5).

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