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

Revised April 1, 2021

## C-1303: Transition Services and the IEP Process

…

### C-1303-2: Students Receiving Section 504 Services in Secondary Education

The TVRC may also work with students who receive services under Section 504 of the Rehabilitation Act instead of an IEP. Section 504 requires schools that receive federal funding to provide reasonable accommodations to enable students with disabilities to fully participate in the services and programs offered under the general curriculum.

As with the IEP, the TVRC must:

* request a copy of the Section 504 plan; and
* place it in the customer's case file.

### C-1303-3: Students Enrolled in Private School or Homeschool Settings

The TVRC or VR counselor may also work with students who are participating in private school or homeschool settings, which are considered recognized education programs. Therefore, these students are eligible to receive Pre-ETS as potentially eligible or VR eligible students if they are within the appropriate age range.

Students who are receiving homeschool or private school educations may not have special education services available to them in the same way publicly enrolled students do. TWC-VR is not obligated to provide or purchase special education services that are the responsibility of the LEA. If a private or homeschooled student needs a service that would normally be the responsibility of the LEA, TWC-VR may consider the need for that service based on the customer’s individual circumstances and determine on a case-by-case basis whether the service is consistent with the student’s VR program and is able to be supported. Services on an IPE in these situations are typically not readily available from a school district and are not the responsibility of a school district under IDEA or Section 504 of the Rehabilitation Act (See C-1303-1). Questions about these situations may be submitted to a member of the state office transition team or by email to the VR Pre-ETS mailbox at vr.pre-ets@twc.state.tx.us.

### C-1303-4: Helpful Checklist of Transition Considerations

When working with transition students, common counseling and guidance topics include the following:

* Advocacy and guardianship
* Assessment requirements
* Behavior-management planning
* Case management needs
* Career exploration
* Counseling in postsecondary education training
* Current educational needs
* Day programs
* Employment
* Income support
* Independent living skills
* Items that the school provides under IDEA
* Lifetime support and planning
* Medical needs and assistive devices
* Recreation and leisure
* Residential services
* Self-advocacy activities
* Supported employment
* Therapies and treatments
* Transportation
* Vocational education and training
* Work-based learning
* Workplace readiness
* Any other areas that need to be addressed

For additional information, refer to C-100: Counseling and Guidance.

**…**

## C-1305: Providing Transition Services

**…**

### C-1305-5: Assistive Technology

The LEA must provide assistive technology and assistive devices to meet the educational needs of secondary school students. The student may use the equipment at home to complete homework assignments and school projects.

In accordance with IDEA requirements, if the student's ARD committee determines that a student with a disability needs home access to telecommunications, sensory devices, or other technological aids to meet the requirements of a free and appropriate public education (FAPE), the LEA must provide the devices for home use in order to implement the student's IEP.

#### Technology Evaluation

Students who may need assistive technology to achieve their postsecondary goals can be sent for an assistive technology evaluation during their senior year of secondary school.

#### Necessity Requirement

The TVRC may purchase the assistive devices and assistive technology only if the items are needed for the student's postsecondary education or long-term employment.

Note: In general, assistive technology should be purchased with basic VR funds, not Pre-ETS funds. However, in some circumstances when assistive devices are necessary and reasonable for participation in a Pre-ETS, like a work-based learning opportunity, the counselor may be able to purchase the assistive technology using Pre-ETS funds for VR eligible students with an approved IPE.

Auxiliary aids and services may be purchased with Pre-ETS funds for students with sensory or communication disabilities who are participating in a Pre-ETS activity and need an auxiliary aid to participate. For questions about purchasing auxiliary aids with Pre-ETS funds, contact the Pre-ETS team by email. Examples of auxiliary aids include qualified interpreters, readers, material written in braille, screen readers, and auditory programs. See 28 CFR 35.104. These auxiliary aids and services can be purchased for both eligible and potentially eligible students.

#### Student Informed Choice

Assistive technology is changing rapidly. When appropriate, the VR counselor discusses the options with the student of having equipment purchased while the student is still in secondary school or waiting until after the student graduates.

If a student and TVRC agree to have equipment purchased while the student is still in secondary school and the assistive technology continues to meet the student's future employment needs, TWC may not be able to pay for more advanced technology at a later date.

#### Prior Consultation

Assistive technology purchases for the purpose of postsecondary education or employment that are made before the completion of the student's senior year of secondary school requires consultation with the Regional Program Specialist for Transition Services.

#### Purchase Procedures

To purchase telecommunications, sensory, and other technological aids and devices, follow the procedures in RHW.

The justification for purchase in the case notes must clearly state that the assistive technology is being purchased for postsecondary education, long-term employment, or for participation in a Pre-ETS.

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

**…**

#### 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/html/transition.html) 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.

**…**

### C-1305-8: 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.state.tx.us.

#### 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.state.tx.us.

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; and

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.

**[NOTE: Section C-1305-9 is being deleted and section C-1305-14: Dual Credit Courses is being moved to its place. Sections C-1305-10 through 13 are unchanged.]**

### C-1305-9: 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-1305-10: 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.state.tx.us.

**…**