# PART C, CHAPTER 8.2: PRE-EMPLOYMENT TRANSITION SERVICES GROUP SKILLS TRAINING (GST)

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| **Policy Number** | **Authority** | **Scope** | **Effective Date** |
| Part C, Chapter 8.2 | 34 CFR [§361.48(a)](https://www.ecfr.gov/current/title-34/part-361#p-361.48(a)), [§361.5(c)(51)](https://www.ecfr.gov/current/title-34/part-361#p-361.5(c)(51)), [§361.65(a)(3)](https://www.ecfr.gov/current/title-34/part-361/section-361.65#p-361.65(a)(3)), [§361.5(c)(2)](https://www.ecfr.gov/current/title-34/part-361#p-361.5(c)(2)), [§361.22](https://www.ecfr.gov/current/title-34/section-361.22), Labor Code [§352.108](https://statutes.capitol.texas.gov/Docs/LA/htm/LA.352.htm#:~:text=352.108.,programs%20or%20competitive%20integrated%20employment.), and Final Interpretation [87 FR 15889](https://www.federalregister.gov/documents/2022/03/21/2022-05940/state-vocational-rehabilitation-services-program) | All TWC-VR staff, particularly those who provide Pre-Employment Transition Services to students with disabilities | 9/3/2024 |

## PURPOSE

In accordance with the authority (Federal and State) listed above, this policy is issued by the Texas Workforce Commission Vocational Rehabilitation Division (TWC-VR). Adherence to these rules and regulations issued under the Rehabilitation Act of 1973, as amended by Title IV of the Workforce Innovation and Opportunity Act (WIOA), supports Texans with disabilities in gaining, maintaining, and advancing in competitive integrated employment (CIE).

Specifically, the purpose of this policy and these procedures is to ensure adherence to TWC-VR rules when developing and providing Group Skills Training, primarily as Pre-Employment Transition Services (Pre-ETS) to students with disabilities (SWD).

## DEFINITIONS

Bilateral Contractor: A service contractor that agrees to specific duties or deliverables under the terms of a contract with TWC-VR.

Informed Choice: The means by which a customer chooses their rehabilitation path, from options based on their needs and circumstances and the TWC-VR rules, as it relates to choosing Pre-ETS services and the providers of those services.

Non-Traditional Provider: An individual who does not have a bilateral contract and who can help a customer achieve an employment goal.

Transition Educator: An individual who is not a provider with a bilateral contract, holds a master's or bachelor's degree in rehabilitation, psychology, education, or a related field (including certified Texas Educators), and is currently or has been employed by a school system, Texas Education Service Center, college, or university within the past fiscal year.

## POLICY

### General Overview

Group Skills Training (GST) involves bringing together students with disabilities (SWD) to collectively learn pre-vocational skills (e.g., career exploration), which can often be more effective and efficient than individualized instruction. GST sessions have a structured agenda, designated start and end dates, and clear learning objectives tailored to the needs of the students. These training sessions aim to equip SWD with practical skills that enhance their employability. TWC-VR staff overseeing and/or providing GST activities must ensure that the learning objectives are clearly defined, articulating what SWD will learn and achieve by the end of the program.

GST sessions focus exclusively or primarily on providing one or more of the five required Pre-ETS activities:

1. Job exploration counseling;
2. 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;
3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs;
4. Workplace readiness training to develop social and independent living skills;
5. Instruction in self-advocacy, which may include peer mentoring.

### Provision of Group Skills Training

GST sessions are designed and provided by TWC-VR staff. When needed, GSTs may include other providers, such as an employment services provider (ESP). GSTs typically require multiple types of purchased Pre-ETS and/or other TWC-VR services, requiring that TWC-VR staff follow all applicable policies and procedures.

When purchasing Work Experience Services through an ESP, Transition Educator, or a Nontraditional Provider for an SWD participating in a GST, the *Work Experience Plan and Placement Report (VR1601)* does not have to be completed.

SWD who are eligible for TWC-VR services must have associated needs and goals included in their Individualized Plan for Employment (IPE) that make participation in a specific GST a necessity. If purchased TWC-VR goods and services (e.g., food, transportation, lodging, clothing, backpacks) are required to participate in GSTs, Pre-ETS funds can be used when those purchases are—

* 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.

For example, if a particular activity requires SWDs to wear a shirt that identifies them with a TWC-VR group when participating in a public setting, those shirts must be simple and reasonably priced, as the additional cost of printing on the shirts is not permitted. The purchase of shirts must follow all applicable procurement and purchasing requirements, and documentation must be retained to justify the purchase.

### GST Funding

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. It is allowable for a combination of potentially eligible and TWC-VR eligible SWD to participate in GSTs. However, when potentially eligible students are participating, purchases for those students are limited to those allowed under the five required Pre-ETS. For TWC-VR-eligible SWD, additional TWC-VR services may be needed in their IPE to support participation in Pre-ETS (i.e., flexibilities) or in addition to Pre-ETS. The VR Counselor must allocate to the correct fund source (i.e., Basic VR, Pre-ETS VR) depending on the type of service.

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.

### Social and Recreational Activities

Predominantly social or recreational activities are not GST. However, 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 (CCRC);
* Classes provided by VR teachers; and
* Training activities provided by an ESP, such as Project Search, Vocational Adjustment Training (VAT), Personal Social Adjustment Training (PSAT), 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 SWD interaction and further prepare them for the workplace (e.g., social interaction, gaining comfort in new environments and situations, promoting leadership and problem-solving skills, team-building exercises, the importance of collaboration).

To the maximum extent possible, recreational activities for SWD 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 students. SDCT instruction includes nonvisual techniques, problem-solving strategies, experiential learning, and confidence-building experiences.

### Construction Clause

Nothing in this policy will be construed to reduce the obligation under the Individuals with Disabilities Education Act (IDEA) of a local educational agency (LEA) or any other agency to provide or pay for any transition services that are also considered special education or related services and that are necessary for ensuring a free appropriate public education to children with disabilities.

### Additional Policy Considerations

* Comparable Services and Benefits: Pre-ETS are exempt from the requirement to secure comparable services and benefits prior to TWC-VR expending funds.
* Customer Participation in the Cost of Services: Students with disabilities who are in receipt of Pre-ETS, are exempt from applying Basic Living Requirements (BLR) and, therefore, the customer is not required to participate in the cost of services.

Eligible TWC-VR customers who require other VR services are not exempt, and therefore, if their net income or liquid assets exceed the Basic Living Requirements (BLR), the customer must participate in the cost of services unless an exception is granted.

* Recipients of Social Security Disability Benefits: Recipients of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI), due to the customer's disability, are exempt from the requirement to participate in the cost of TWC-VR services regardless of income.
* Exceptions to Policy: When necessary to meet the VR needs of a customer, TWC-VR staff members may request exceptions to policies and procedures through their chain of management up to the Deputy Division Director of Field Services Delivery, or designee. However, exceptions to policies and procedures based on Federal and State laws, statutes, and rules or regulations are not allowable.

## PROCEDURES

### Planning and Developing GST

Planning is essential for developing and providing a high-quality GST for SWD. The Pre-ETS GST Template for proposals is available to assist TWC-VR staff and to facilitate the management approval process.

While it is expected that most GSTs proposed by TWC-VR staff will be accompanied by the GST template, TWC-VR staff may alter the GST template to propose other types of training if—

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

### GST Application, Review, and Contract Processes

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

* Each August, the TWC-VR State Office provides to TWC-VR staff a list of the approved GSTs from earlier in the fiscal year (i.e., Oct. 1 – Sept. 30). TWC-VR staff must 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 (RD) approval to the State Office Transition Team by September 15. If more than one region is involved, all RDs should provide approval.
* For new and repeating GST activities, designated VR State Office staff review the proposal to ensure compliance with policy and submit the GST template and supporting documentation to the VR Deputy Division Director for Field Services Delivery and the VR Director.
* 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.
* The VR Deputy Division Director for Field Services Delivery notifies the RD as to whether the GST proposal has been approved.
* The Regional Director notifies the VR Manager.
* The VR Manager must ensure that designated TWC-VR staff implement the GST as approved and follow all required policies and procurement processes.
* TWC-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 SWD's VR Counselor must hold a meeting with the other appropriate unit or regional staff to discuss the activity and coordinate participation for the SWD. 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.
* 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 SWD achieved the learning objectives, and to 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 TWC State and Regional Management upon request.

### Expected Time Frames

If all required information is included in the initial submission, a GST may be approved by the VR Division Director for Field Services Delivery within two weeks of submission to the [VR.Pre-ETS@twc.texas.gov](mailto:vr.pre-ets@twc.texas.gov) 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.

TWC-VR staff must submit 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. TWC-VR 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 SWD to receive the benefit of the training activities.

Family members may participate in GSTs when—

* The GST activities are designed to include the parents or guardians as part of the skill attainment process during the GST and thereafter;
* The primary purpose of the GST is to provide education, training, and resources to the student and parents and/or guardians; or
* 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 VR Counselor 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 or caregiver 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 funds. 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 cost using Pre-ETS funds for VR-eligible students, so GST activities should be planned only when lodging 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.

If the lodging is in a hotel with more than 10 hotel rooms needed, the VR Manager must first obtain approval from the VR Division Director for Field Services Delivery 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.

### External Presenters and Contributors

When external presenters and contributors of in-kind resources (e.g., 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.

### 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 SWD applying to participate in a GST, the *Medical Information and Consent for Participation in TWC-VR Activity (VR1827)* 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; and
* 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*, when applicable:

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

### SWD 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 (e.g., medication assistance), certified lifeguard, or licensed commercial driver, if a VR Counselor determines that there is a need; or
* Make phones available in vehicles that transport SWDs.

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

### Post-GST Follow-Up

Once the training is completed—

* The VR Counselor documents the SWD participation and the GST training activities in a case note and explains how the GST is meeting their 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.

## APPROVALS & CONSULTATIONS

TWC-VR staff must follow the following approvals and consultations:

* *State Office Program Specialist for Transition and Pre-ETS approval is required for any GST.*
* *VR Manager, Regional Director, and VR Director approval is required to ensure that GST proposals are complete, accurate, and fully compliant with associated policy and procedures.*

**REVIEW**

The Policy Planning and Statewide Initiatives Team, or designee, is responsible for reviewing this policy and these procedures and will update the Document History log if necessary.

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| **Date** | **Type** | **Change Description** |
| 9/3/2024 | New | VRSM Policy and Procedure Rewrite |