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

Revised June 29, 2020

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

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### C-1303-1: Required for Planning and IPE Development

WIOA requires VR staff to attend ARD meetings when invited. Attendance may be virtual; that is, through conference calling, video meeting, and so on. Communication with school partners is vital to facilitate appropriate and timely invitations to ARD meetings.

The VR counselor works with the school, parents, community partners, and students to ensure that the student and parents or guardians are informed about available services and any associated program requirements, as a part of a set of coordinated transition services.

The VR counselor must do as follows:

* Explain the services provided by:
  + other appropriate resources;
  + the Texas School for the Blind and Visually Impaired (TSBVI);
  + the Texas School for the Deaf (TSD);
  + The Blind Children's Program under HHSC;
  + advocacy organizations, such as Partners for Assisting Texans with Handicaps (PATH)and Disability Rights Texas;
  + customer groups, such as the American Council of the Blind (ACB) and the National Federation of the Blind (NFB); and
  + the Criss Cole Rehabilitation Center.
* Obtain and use appropriate school records as a source to determine a student's eligibility and to develop an IPE. School testing that includes a diagnosis determined by school professionals (for example, a diagnostician, licensed specialist in school psychology, speech pathologist, etc.) may be used to establish an impairment for the purpose of determining eligibility. For information on eligibility determination, see [B-300: Determining Eligibility](https://www.twc.state.tx.us/vr-services-manual/vrsm-b-300), and for information on IPE development, see [B-500: Individualized Plan for Employment](https://www.twc.state.tx.us/vr-services-manual/vrsm-b-500).
* Complete a comprehensive assessment of the eligible individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, including the need for supported employment services provided in the most integrated setting possible, consistent with the individual's informed choice, as defined by WIOA
* Provide transition services during secondary school as well as after secondary school, during the transition to postsecondary services, such as education, vocational training, and employment
* Coordinate services that align with the transitioning student's IEP
* Attend ARD meetings, when invited, in person or by alternative means such as teleconferencing or video conferencing (see CFR 361.22(b)(1))
* Provide students who have limited or no work experience the opportunity to develop soft and hard skills through Pre-ETS

The VR counselor must also:

* obtain a copy of the most recent IEP or Section 504 plan to help with transition-planning activities;
  + Note: When an IEP or Section 504 plan is not available, document that in a case note. This may occur when a student is not receiving services in one of these programs while in public school, has not yet started the process, or is enrolled in an educational setting that does not formally provide them (for example, homeschool, private school).
* document in ReHabWorks (RHW) whether the student has an IEP or Section 504 plan; and
* complete the IPE before the eligible student leaves the school setting and no more than 90 days from the time that the student's eligibility for VR services is determined.

IPE services must:

* be vocational in nature; and
* support and lead to achievement of the employment goal identified in the IPE.

IPE services:

* must not be the responsibility of the school district under IDEA or Section 504 of the Rehabilitation Act; and
* must not be readily available from the school district.

Students who receive transition services are usually in a career exploration stage of development while they are still in secondary school. Counseling and guidance, along with specific exploration activities and other Pre-ETS activities, is expected as part of the IPE. Multiple IPE amendments may be necessary as the student's rehabilitation needs and vocational goals change.

Depending on the complexity of the student's circumstances and need for services, TVRCs can begin working with students who are enrolled in secondary school at any time to help them move successfully from school to competitive integrated employment.

According to special education law, transition services must be included in the IEP of a student at age 16; although, in Texas, transition services may begin at age 14, or even earlier, if the IEP or the results of the ARD meeting indicates that the services are necessary.

Transition services promote or facilitate the development of the student's IPE while he or she is still in secondary school.

The IPE for transition services can include:

* Pre-ETS;
* postsecondary education;
* employment services;
* housing;
* daily living skills;
* long-term issues (such as attendant care, guardianship, assistive technology, and therapies);
* activities that promote confidence, team building, and effective communication; and
* transportation and/or maintenance to support other services.

The IPE must also:

* be based on current information regarding the student's knowledge, skills, interests, and preferences;
* set timelines with projected beginning and ending dates for all activities leading toward achieving the student's goals; and
* identify a network of support, such as family, friends, agencies, and community resources, that can help the student achieve the desired goals.

To prepare VR eligible students for success in postsecondary school and competitive, integrated employment, Pre-ETS, along with other VR services, can be provided to enhance or complement services that the school is already providing. Or these services may be provided in partnership with the school, with consideration that the services are not duplicative.

Services exempt from the customer's cost participation include the costs for:

* the assessment for determining the customer's eligibility;
* the assessment for determining the customer's VR needs, including associated maintenance and transportation;
* VR counseling and guidance and referral for other services;
* in-house services provided directly by VR staff;
* job-related services, including job search and placement assistance, job retention services, follow-up services, and follow-along services;
* personal attendant services;
* any auxiliary aid or service (for example, interpreter services) that a customer with a disability requires to participate in the VR program;
* diabetes education services;
* orientation and mobility services;
* Pre-Employment Transition Services (Pre-ETS); and
* Other VR services that directly support Pre-ETS, like transportation, maintenance, and personal assistant services (applicable for VR eligible students only). See the [Pre-ETS Desk Reference Part 2](https://intra.twc.texas.gov/intranet/vrs/html/transition.html) for a complete list.

This policy must be applied uniformly to all customers in similar circumstances.

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

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## C-1305: Providing Transition Services

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### 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 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](mailto:vr.pre-ets@twc.state.tx.us). 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 Approval

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 must be approved by the counselor’s supervisor.

#### 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

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#### 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 Pre-ETS mailbox: VR.Pre-ETS@twc.state.tx.us.

Examples of these services include:

* transportation
* maintenance
* assistive technology
* job skills training
* personal attendant services, and
* assessments
* 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.

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.state.tx.us).

#### 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.

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.

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### 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

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#### 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](mailto:ConferencePlanning.Media@twc.state.tx.us).

#### Materials

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### C-1305-11: 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-1305-12: Workshops and Seminars

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### 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, however, approval by the VR Supervisor is required for a student to be enrolled in less than a full-time course load as defined by the college or university.

## C-1306: Pathways to Careers Initiatives

### C-1306-1: Summer Earn and Learn

Summer Earn and Learn (SEAL) is a statewide strategy that includes employability skills training and paid work experience for students with disabilities. It is offered in each of the 28 local workforce development areas (workforce areas) during the summer, when students are out of school. Participants in SEAL must meet the definition of a student with a disability, including current VR customers and those who may be potentially eligible for VR services. Most employers prefer students to be at least 16 years old to participate in work experience; however, some employers, particularly those in the public sector, may be willing to offer work experiences for younger students.

Additionally, students must meet the following conditions:

* Exhibit behavior that is appropriate for a work setting. If the student has, at times, displayed behaviors that are not work-appropriate, the student should be able to be redirected with minimal intervention.
* Be receptive to counseling and guidance about the importance of appropriate workplace behavior.
* Be motivated to participate in the work-based learning program.

If a participant in SEAL needs services to access the program or support successful participation, such as sign language interpreting or Work Experience Training, these support services can be purchased with Pre-ETS funding.

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

Other support services, such as transportation or maintenance, may be purchased with Pre-ETS funding and may only be provided for eligible participants, not for potentially eligible participants.

#### Social Security Beneficiaries in SEAL

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## C-1307: Participation in Cost of Services

### C-1307-1: Student Participation in the Cost of Training Seminars and GSTs

GSTs, seminars, workshops, camps, and work experiences are training activities related to Pre-ETS. The student is not required to contribute to the cost of these services, regardless of whether or not the customer's net income or liquid assets exceed the basic living requirements (BLR).

Students are expected to provide their own money for incidental expenses while participating in a GST or similar training or activity, but they will not be asked to participate in the cost of transportation, maintenance, or other supporting goods or services associated with the Pre-ETS training.

The TVRC may use any TWC-approved method for providing transportation to students. When available, transportation that is of no cost to TWC is used. If this is not available, the most cost-effective and reasonable method of transportation must be used.

### C-1307-2: Family Participation in Training Seminars and GSTs

When parents (or legal guardians) of eligible VR students participate in a training activity, including Pre-ETS, with the student to further the student's vocational adjustment or rehabilitation, the cost of the training is not subject to customer contribution requirements or BLR. However, these requirements must be applied for all incidental expenses and transportation costs for family members unless a parent or representative is required to participate in the activity for the student to attend.

If a parent and or representative is providing supervision or attendant care for their child in conjunction with a TWC-VR sponsored activity, any applicable transportation and food costs for one parent will be included in the training costs regardless of economic resources. These must be reasonable and the same costs that any participant in the GST would incur.

On a case-by-case basis, a waiver of the BLR criteria for an additional family member may be requested from the VR Manager when the parent and/or legal guardian is providing supervision or attendant care for the student.

### C-1307-3: Texas School for the Blind and Visually Impaired

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## C-1308: Transferring a Transition Services Case

For information on transferring a transition services case, see [D-304: Transfer of Cases and Caseloads](https://www.twc.state.tx.us/vr-services-manual/vrsm-d-300#d304).