



## Pre-Employment Transition Services Flexibility Based on Notice of Interpretation

JOHN WALSH: Hello, and welcome to all that are joining us for today's webcast. My name is John Walsh, and I am the Project Director for the Center for Innovative Training in Vocational Rehabilitation, or CIT-VR. I'm joined with my colleagues, Missy Diehl, Christine Johnson, D.J. Ralston, and other members of our George Washington support team.

Thank you for taking time out of your busy schedule today to join us for this watch party. The party is going to focus on pre-employment transition services flexibilities based on the notice of interpretation. So we're going to have a party around that, around the NOI. This event is a joint presentation sponsored by the National Technical Assistance Center on Transition: the Collaborative. Also, the VR Technical Assistance Center on Quality Management, and of course, the CIT-VR.

As we're expecting a large number of participants at today's session, we are highly encouraging you to use the Q&A feature that's part of Zoom to ask your questions. The GW team will be monitoring the QA box for your questions. As we go through the presentation, if you have a question, put it in there. And that way, we'll be able to get to it and answer your questions.

I also wanted to make a few brief remarks around the logistics of getting your CRC continuing education hours, and completing the evaluation. The quickest way at the completion of this webinar is if you return to the [trainvr.org](http://trainvr.org) site. Select webinars, and select today's webinar. You will see the link to complete the quiz and the evaluation. Once that's completed, you'll receive your CRCC continuing education certificate via email.

We're also going to send you a reminder later this week if you didn't get a chance to get to our website with the link, that will take you to the evaluation. Your feedback is really important to us. So please, we really encourage you to complete the evaluation, and give us that feedback.

Also, we'd like to remind folks to please come back often to [trainvr.org](http://trainvr.org) to check for future offerings we have. We are doing a lot of collaborative work with the major technical assistance centers, so we want to present no wrong door for you to find valuable training and resources. So now, I'm going to turn it over to my colleague, and the moderator for today's session, D.J. Ralston.

D.J. RALSTON: Thanks, John. Hi, everybody. Are we ready to get this party started? Right? Since John so nicely set us up for our party, let's talk a little bit about this. You might be wondering what is the watch party. We do actually have some purpose behind this.

So what we are going to do today is, we are going to have a collective viewing of a prerecorded training session on the NOI. But the cool thing about this is, you have the experts who actually facilitate that training session on with us today. And so that's Missy and Christine. And so what we want to do as John said, we're really encouraging you all to use the Q&A function.

And we want to encourage you to actually do that throughout the training. So that way, we can throughout the recording, as we kind of watch it together, so that way we can maybe stop here and there and answer questions. So really, this is meant for you. We really want this to be interactive.

We know that in a more traditional webinar, the presenters kind of just go through the paces, and kind of get through things. And they don't always have the opportunity to answer questions as they go. Well, this is the advantage of joining the watch party. So let's make it a watch party.

With that said, I do want to hit on a couple of more logistics, one of which is, we do have sign language interpreters today with us. So a big shout out to Teresa and Lea. Thank you both very much. They are spotlighted. For those of you who may be new to Zoom, in the upper right hand corner of your Zoom screen, you'll see something that says view.

If you want to ensure that you can see our interpreters, you want to make sure that your view says gallery. So please go ahead and change that now. The other thing we want to talk to you about is the fact that we do have live transcript today, or closed captioning. All you have to do to get to your closed captioning and turn that on is click the live transcript, and then select Show Subtitles.

However, we do want to let you know that the actual recording that we're going to be watching collectively, has its own closed captioning. So we would encourage you to just use that for the purposes of while we're watching the recording. And you can go ahead and turn your subtitles off by hitting that same button, and hit hide subtitles. And then when the recording is over, and/or if we stop it at any point, you can choose to turn that back on pretty simply.

Again, please use the Q&A if you have questions and answers. You're also welcome to put things in the chat. We can't guarantee that we'll catch everything in a chat. So if you have kind of a pressing issue, please go ahead and put that in the Q&A. I think with that, I'm going to hand it over to Melissa Diehl to get us started before we get moving with recording. Missy?

MELISSA DIEHL: All right. Thanks, D.J. Hi, everyone. Thank you so much for joining us. We really look forward to having a good dialogue and discussion with you all, which we hope this format is going to allow for. And since we've released this recorded version that you all are going to watch, we've had I think almost 1,000 people watch.

And we've had a ton of questions. And the questions keep coming. So when we get questions that seem to be in clusters, that's when we start to think about other ways that we can deliver information, and share information across each other, and learn from each other. So hoping that this format will work for you all. I'm interested in your feedback afterwards.

One of the things that we're doing is, we are making the assumption coming into this watch party on the notice of interpretation, on the flexibilities around pre-employment transition services, that everyone coming in has a basic understanding of pre-employment transition services, and the minimum 15% reservation required, and in the five required services, the four coordination activities, and the nine authorized activities.

So if you do not have that basic understanding and you want us to touch base on that when we do pause for questions, please feel free. We're happy to do that. We just wanted to use every minute of this time to talk through some of the nuances from the notice of interpretation.

So what is this notice of interpretation? So in February of 2020, RSA released through the Federal Register this guidance through the Department of Education on the flexibilities for pre-employment transition services. And we're going to watch the recording in a little bit, which is going to dive through that.

But one of the things I just wanted to point out was, since February of 2020, RSA did request comments. There was a comment period. And they do anticipate publishing a final version of that, which we don't anticipate there being significant changes, but maybe more clarification of what has already been stated there based on the questions folks have received. So with that said, I'm going to turn it back over to D.J. and we can get our party started.

So on February 22, 2020, the Department of Education issued this notice of interpretation. And it was effective the date that it was issued. So effective February 28 of 2020. And this interpretation focuses on two primary areas.

The first is a clarification of current policy. And that's regarding the use of the reserve funds for pre-employment transition services to pay for auxiliary aid and services that are needed by a student with a sensory or communicative disability, in order for them to be able to access, or participate in one or more of the required pre-employment transition services.

So let's take a look at the second purpose, which includes an announcement of a change in policy. So this is new as of February of 2020, with respect to those additional VR services that a student with a disability who's applied, been determined eligible by the VR program, may need in order to participate in pre-employment transition services. And those services must be in accordance with their approved IPE.

So let's take a look at this first piece, that first clarification regarding auxiliary aids and services. We get a lot of questions from states asking specifically what constitutes an auxiliary aid service. So an auxiliary aid or a service under Title II of the Americans with Disabilities Act in implementing regulations really has four basic components to it.

And we have these on the slide, and we're going to go through some examples of each. But the first is, what are those effective methods of making orally delivered information available to individuals who are deaf and hard of hearing? And let's take a look at the second one on the next slide here.

And the next is, those effective methods for making visually delivered materials available to those who are blind or have low vision. The third, acquisition or modification of equipment and devices. And the fourth, other similar services and actions.

So on this next slide, with respect to the notice of interpretation, it clarifies that any student with a sensory or communicative disability that requires an auxiliary aid or service in order to access or participate in pre-employment, the VR agency can pay for those costs with the reserve funds if no other public entity is providing or required to provide those aids or services.

So we're pointing that out, because we want to make sure that we're emphasizing and having states remember that if another entity is required to pay or provide for those aids or services, they need to continue to do so. Just because VR may now pay for these aids and services doesn't mean that it reduces the obligation of the other public entity when necessary to provide those accommodations.

So some of the examples in that definition of an auxiliary aid or service include, qualified interpreters, including sign language interpreters, note takers, and readers, assistive listening devices, video phones, Braille materials, and displays, screen readers and software, magnification software, large print materials, et cetera. But what they do not include are personally prescribed devices, like eyeglasses or hearing aids, or personal devices, such as computers, or laptops, or tablets, readers for personal use or study, or home or a vehicle modification. That's not considered an auxiliary aid or device.

It doesn't mean that VR cannot provide these services. It just means that they're reserved for those individuals who are eligible, and have an IPE. And those services are not going to be able to be charged to the reserve, because they're really outside of the scope of pre-employment transition service.

So just to summarize a bit what we kind of talked about, we talked about these two populations. We talked about potentially eligible students, and eligible students with an approved IPE. So for potentially eligible students with disabilities, these students haven't applied for VR been determined eligible. And this NOI describes that these potentially eligible students, they can receive the five required employment transition services. And if they have a sensory or communicative disability, they may also receive the auxiliary aid and services they may need in order to access pre-employment transition services.

D.J. RALSTON: Hey Missy, I think that maybe you and Christine had a couple of things you wanted to weigh in on real quick.

MELISSA DIEHL: Yeah, we thought that this might be a great place to pause the recording as a kind of natural pause place, and just check in with folks to see. Because we do get a lot of questions around auxiliary aids and services.

So before we jump in with some things that we typically get questions about, I just wanted to give the opportunity for folks-- if they have a question, or something that has come up in their agencies as they begin to build policies and procedures around the use of these flexibilities, and the use of auxiliary aids in delivering employment transition services, if there's any questions that they might have.

CHRISTINE JOHNSON: Missy, we do have one question in the Q&A.

MELISSA DIEHL: OK.

CHRISTINE JOHNSON: And that's with something like Kurzweil 3000 program for reading written text out loud, and controlling speed be covered? It seems like a difficult line to decide what is more for studying/personal use versus in school use.

MELISSA DIEHL: Right. And that's a great question, and a great clarification. And one of the things I really love about the notice of interpretation, is that it really walks through some of the things we'll talk about. The software could be considered, but not the computer itself, or things like that.

And I think what you're hitting on-- the person who entered that in the Q&A-- is very important and that's the purpose. And whether it's solely benefiting the student with a disability in participation, and allowing them to participate in that pre-employment transition service, versus it also benefiting maybe the other services that they're in receipt of.

And so if in order for that student to access, maybe it's right now, most things are virtual, some sort of a virtual service for that student to participate, they need Kurzweil in order to participate. Then it would seem reasonable to assume that that would be a cost that would be necessary for pre-employment transition services.

However, if that student was also using that Kurzweil software for other VR services maybe they're participating in, then the agency would have to have a method to kind of discern the portion of the cost that's benefiting that student in relation to pre-employment versus the other VR services they might be receiving.

SPEAKER: Missy, there are a couple of other questions in the chat as well. So I'll read the next one to you. It is, can something like timers or a specialized watch for attention issues at work be bought using pre-ETS auxiliary aid money.

MELISSA DIEHL: So that's a great question. Because we're thinking about, is that for a student who has a sensory or communicative impairment, right. So I would go back to that definition

under the ADA of auxiliary aid or a service. And I would look at how does that individuals meet that definition, and how does that service align with one of those four criteria.

So if we're looking through this, and we're looking at is that-- boy, I can't talk today. Is that device being used by the student with the sensory or communicative impairment? Or would be in order for that student to enable them to participate? Versus like a rehab technology situation that would be maybe reserved for somebody who is eligible.

CHRISTINE JOHNSON: We have another question. It says, can you speak about the use of a work based learning coach for pre-ETS for eligible youth with an IPE versus potentially eligible. And we do talk about that in a couple more slides about the allowable cost.

D.J. RALSTON: So in other words, Christine, like hashtag spoiler, right. They're getting ahead of us a little bit.

CHRISTINE JOHNSON: Exactly.

MELISSA DIEHL: But just to clarify, and this is why we kind of wanted to take a break right here. Because for potentially eligible students, this is the extent of the expansion of the flexibilities. It's the five required pre-employment transition services, and then auxiliary aids and services for students with sensory communicative impairment. And then yep, this is a good place for us - unless we have another question on auxiliary aids, like, maybe we just jump right into the second part.

D.J. RALSTON: You know what, we did have one more in the chat that I think we look at real quickly, because I think it's actually a pretty short answer. But are there other services that can be provided as auxiliary aids for students who are potentially eligible, but who do not have sensory or communicative impairments? Or does this only apply to sensory and communicative impairments?

MELISSA DIEHL: So we did get clarification from RSA that this current policy is for students with sensory and communicative impairments. However, I would say that if you had a specific situation that you're not sure about, then I would feel free to either, you could send it to us, and we could talk through it with you, or you could even talk through it with your RSA state liaison to see if there's a specific circumstance that might work.

D.J. RALSTON: OK, y'all. Well, we'll go ahead and hit the play button, and keep on moving.

MELISSA DIEHL: Well, students with disabilities who've applied and been determined and they have an IPE, these students can of course receive the five required services. They can receive the auxiliary aids and services students with sensory or communicative disabilities need in order to participate. But these students may also be able to charge to the reserve additional VR services that they might need in order to benefit from pre-employment transition services. And we have to make sure that these costs are necessary reasonable, allowable, and applicable.

So we'll kind of unpack that a little bit here. For eligible students with an IPE, these other services could include assessment services, so an eligible student with a disability might need to participate in let's say, a assistive technology assessment in order for to identify whether that student might need some type of a reasonable accommodation in order to participate in the pre-employment transition service. It might be maintenance.

Maybe that student with a disability needs a uniform, or steel toed boots in order to participate in a work based learning experience. There might be transportation costs that an eligible student with a disability might need in accordance with their IPE in order to participate in pre-employment transition services. In addition, it could be rehab technology, personal assistant services.

A lot of the services that over the past couple of years since WIOA was implemented, that agencies would have kind of struggled with in order to make them available for students with disabilities. Because sometimes, a lot of the cost of these services, and the participation and pre-ETS are in these additional VR services. But up until thee NOI, they were not able to be charged to the reserve, and now they can.

Family Services is another service that we've heard quite a bit about, particularly for families where maybe the parents need a foreign language interpreter in order to participate in a meeting with VR and the student, so they can provide consent, et cetera. Coaching services is another really big one that we've heard a lot of states asking about prior to this notice of interpretation.

So for eligible students with an approved IPE, coaching services, in order for a student to participate in a work-based learning experience can now be charged to the reserve. We do want to mention though, this is different than what we'll talk about in another slide or two with regard to supported employment. This is not supported employment.

This is strictly for that short term in nature career exploration, work-based learning experience versus what supported employment is intended to do, which is to transition that individual into a long term employment setting. So just wanted to make that distinction for folks, because we hear that quite a bit too.

So this slide talks about the set of VR services that are most often going to be outside of the scope of pre-employment transition services. So this includes vocational and other training services, advanced training, transition related services, medical services. These are really services that are just outside of the scope of participation in these short term in nature career exploration activities that pre-employment transition services are designed for. Let's go to the next slide.

And then of course, these services, job placement assistance, job search assistance, supported employment services, and tuition fees, post-secondary institution costs. Those are really outside of the scope of pre-employment transition services, and are not allowed to be charged to the reserve.

D.J. RALSTON: So I thought we might want to stop again, let some of those questions come rolling in. What do y'all say?

CHRISTINE JOHNSON: Sounds great.

MELISSA DIEHL: That sounds good. Do we have any questions queued up? One question that came in the chat that I noticed when we started the recording was a question regarding how to report those auxiliary aids and services.

And so I dropped in the chat a FAQ from RSA, which is really nice, because it kind of gives examples about how to report and track those auxiliary aids and services. And then also talks about these additional VR services that are needed in order for the student to participate. So it's a really great FAQ you haven't seen it.

SPEAKER: Missy, there are also a couple of other questions related to the auxiliary aids and services. One says, this is outside of typically assistive technology services and supports, I assume. So there was a question related to that. And then a secondary question, that's related also, what about a device that one would need to access the program, such as Kurzweil or JAWS?

MELISSA DIEHL: That's a great question. And I think that one you can answer right on page 11850 of the notice of interpretation. All the way down at the bottom on the first column of that, they kind of give an example about if somebody needed a screen, or software program to enable a student. And it talks about how you could purchase the screen reader software for the student's personal laptop, or for a laptop that would be available for other students.

And that the screen reader software for the individuals would be what's allowable, but not the computer, as that wouldn't meet the definition of an auxiliary or a device. So I think that kind of helps provide that distinction for you. And I was trying to give you the synopsis of that, but I think it's a really nice description to walk through how they separate that out. Hopefully, that answered your question.

CHRISTINE JOHNSON: We do have a question here that someone has said they're not familiar with the IPE. However, in their area, students qualify for pre-ETS with a 504. And can the notice of interpretation apply for those individuals?

So yes, I mean, a student with a disability may have an IEP under education's IDEA, or they may be on a 504 plan. Or they may be an individual regarded as having a disability that would qualify them under 504. So the notice of interpretation would apply to all students with disabilities who are receiving pre-employment transition services.

MELISSA DIEHL: Right. I think the distinction to make is just that what we're trying to separate for you, and make the distinction that the NOI does, is that while all students with a disability can receive pre-employment transition services, a potentially eligible student, or a student that has not yet applied for VR, VR has not yet made a determination of eligibility. And when we say



IPE, we're talking about for VR the development of the individualized plan for employment for which all the services a student is going to receive should be on.

So the first set of services, auxiliary aids and services, those are services that can be charged to the reserve for any student with a disability who has a sensory or communicative impairment, regardless of whether or not they've applied. But the additional VR services that can be charged to the reserve when a student needs them for pre-employment transition services, this second set, this new policy is reserved for those students who have applied and been determined eligible, and these services are going to have to be on their IPE.

CHRISTINE JOHNSON: That answers the next question that someone has put in the Q&A about, are services such as coaching and transportation in order to participate in a pre-ETS service allowable for students who only have a pre-ETS case open. That would be a student who doesn't have that VR case IPE. So yeah, this is talking about those students who are eligible, and have that approved IPE in place.

D.J. RALSTON: OK. Should we get back to it I guess. Any other last minute questions before we start the last segment of the recording? Going once, going twice. All right. Off we go.

MELISSA DIEHL: And with that, I'm going to turn it over to my colleague, Christine Johnson, who's going to talk about the potential impact of the NOI.

CHRISTINE JOHNSON: Well, thank you very much, Missy. The potential impact of the notice of interpretation, what we're starting to see is that VR agencies are beginning to revise their policies and procedures. They're also updating their case management and financial management systems, so that they can account and track these additional services that may be charged to the reserve.

Also, potentially, more students with disabilities are going to be encouraged to apply for VR in order to access the additional VR services they may need in order to participate in pre-employment transition services. One of the questions that we often received from states is regarding order selection.

So this last bullet is clarifying that students who have begun to receive pre-employment transition services prior to application can continue to receive those services, even if they then apply and are placed on an agency's wait list in accordance with their disability priority category assignment. For those students with disabilities applying earlier, may actually assist them in getting the VR services that they need prior to graduation once their category opens up, and then they're able to be served.

Another impact is that it's going to provide VR agencies with a much more accurate account of the amount of funds that they are expending now on these students with disabilities who are provided with pre-employment transition services. Some states have been doubling the number of students with disabilities that are being served each year. In some cases, that's a huge increase.

And in order to be able to continue to make these services available to all students with disabilities in the state who need them, VR agencies are redesigning some of the programs that they've been providing, and they're looking for more cost effective strategies, so that they can have better control of their resources.

On July 22, 2014, the Workforce Innovation and Opportunity Act went into effect. And so since that time, the impact of pre-employment transition services has meant that for the first time ever, VR is serving more individuals under the age of 25 than the adults. VR and their providers are also adjusting to gaining more skills, being more prepared to work with this younger population.

We continue to see that VR agency resources are being stretched. And VR agencies are implementing an order of selection. And applicants and eligible individuals who are not able to be served, are going on a wait list. So this is increasing as the number of students served as potentially eligible rises, and they're not subject to the wait-list.

Another impact that we're seeing is that VR really has to become proficient in leveraging other partner resources, such as education, and also labor, and including their WIOA youth program Title 1 Youth Services. And in that manner, VR will be able to more effectively stretch their resources.

The notice of interpretation also emphasized that since the addition of the five required pre-employment transition services, the VR program now is characterized as providing this continuum of services that includes pre-employment transition services. The graphic on this slide really highlights that continuum, and it's really looking at the three distinct sets of services that are to be provided and are available to students with disabilities.

So we start with pre-employment transition services being that early start of employment exploration. They are short term in nature. They're available to any student with a disability, regardless of whether they've applied for VR. They lay the foundation for those students who then can continue on to receive transition services as the next set available to them, and available as eligible individuals in the VR program.

So transition services for those eligible students with disabilities, can provide further development and the pursuit of career interest with post-secondary education, vocational training, job search, job placement, job retention, job follow up, and job follow along services. And finally, that employment related services to eligible individuals are next in this continuum.

These are services that typically are provided once eligible students have identified and solidified career interests. They're further developed and pursued their career interests through post-secondary education, vocational training that may be offered through transition services. And they may be pursuing specific employment outcomes.

Employment related services are identified in section 103A of the Rehabilitation Act, and 34CFR 361.48B. And they are intended to assist eligible individuals with disabilities to prepare for

secure, retain, advancing, or regain an employment outcome that is consistent with that individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interest, and informed choice.

D.J. RALSTON: And with that, we've concluded the pre-recorded part of our collective watch party. And now, we have some additional time to answer Q&A. So hopefully, you are starting to fill up that Q&A and/or putting comments in the chat. But if you are looking to get questions out there, please, please, please put the questions in the Q&A if possible.

MELISSA DIEHL: Yeah, one thing I did want to mention to folks, and I can put this in the chat. But our new NTACT: the Collaborative website, we're under a soft launch right now. So bear with us that we're still under construction.

But there are five new frequently asked questions around pre-employment transition services that you will find at this link on the FAQ side for pre-employment transition services. And some of them deal with these flexibilities, and the notice of interpretation. So I would encourage you to take a look if you can.

And if you have any questions in navigating, or not being able to find it, please reach out to anyone here on our team, and we're happy to just send you the Q&A as well as help you navigate the new website.

CHRISTINE JOHNSON: We do have one question where someone's asking what types of services are found under the WIOA Title 1 Youth Services. And probably don't have enough time in this webinar to go through all the different aspects of what's in WIOA for all titles and departments.

But under the Department of Labor, the Title 1 Youth Services have a similar charge of providing experiences and employment opportunities, and such, for students and youth under that federal legislation there. And for Title 1 Youth programs, they have a 75% and 25% ratio.

So 75% of their youth that they serve must be out of school youth, those who have dropped out, or homeless. And D.J. just put the link in the chat there for everyone to learn more. But 25% of those youth have to be those who are in school.

And since COVID happened, the states were given a waiver, so that they can now go beyond that 25%, and serve more students who are still in school. So that is a resource that VR agencies can partner with their Title 1 Youth programs to look at expanding the range and services for students with disabilities.

D.J. RALSTON: Yeah absolutely. Christine, if I could just jump in and kind of piggyback off of that. So that's a really great question. So what does the WIOA Title 1 Youth Services program provide? So as Christine said, it is kind of similar.

It really is focused on long term outcomes, and helping youth who are typically described as maybe at risk-- or sometimes, we call them opportunity youth-- in making that transition from

adolescence to adulthood. So making sure that they have access to education if they have actually dropped out, making sure that they get re-engaged in some type of educational or training program, as well as making sure that they have the appropriate workplace readiness, skills, and work experience.

So if we think about that, there is a lot of alignment. And there are ways that we can really work together. As Christine said, while the WIOA Title 1 Youth program does traditionally focus on out of school youth, they do still have a percentage of their program allocated to serving in school youth. And there are several states, as Christine just mentioned, that have actually a waiver in place at this point so that they're able to serve beyond just that 25% in school. It's definitely worth having a conversation with your Title 1 Youth partners.

Additionally, there are some criteria around what that program looks like. So typically, out of school, or even if in school, they have to meet some of the other again, kind of at-risk criteria, or are they maybe attached to foster care. Are they homeless, runaway, pregnant and parenting?

But y'all, disability is in there. And typically associated criteria for the Title 1 Youth programs includes an income bar. But what's really great about a youth with a disability for the purposes of the Title 1 Program, is that they are considered a family of one.

So in that sense, the only income that's counted for that youth with a disability for the Title 1 Youth program is that use income. So even if their parents may be over income, the youth themselves will not be. So that's something to consider.

As Christine mentioned, I dropped a couple of links in the chat. My apologies for the first non-live link. But there are a couple of good fact-sheets out there. And there are some additional resources. And hopefully, we'll have some additional resources in the future about how VR can better partner with Title 1 Youth moving forward.

CHRISTINE JOHNSON: We do have someone ask about the definition of disability that's being used. Because they quoted, or they said that secondary and pre-secondary education definitions are maybe broader than what may be found elsewhere. So the answer to that is, really, under the VR program, in order to be considered a student with a disability for the purposes of being able to access pre-employment transition services, the student just has to meet the age range in that state, and be in receipt of services under IDEA.

Or they're considered an individual with a disability for the purposes of section 504. They don't necessarily have to already have a 504 plan. So often, there may be students that do not have that, but they are considered the individual with a disability.

D.J. RALSTON: The caveat to that, though, is there still needs to be some type of documentation that they are a student that could be considered as having a 504 plan. So just don't forget about part, folks. Y'all, we had another question come up asking us if we could talk a little bit about

some of the types of assessments that could be provided with pre-ETS funds. I'm going to let one of you tackle that.

MELISSA DIEHL: Right. Well, I think prior to this notice of interpretation, outside of transportation and coaching, assessment was with a close third in the amount of questions about why can't-- why don't these count, because these are typically the things that we do with individuals first in helping them explore career options, and helping get a sense of their interests, and what they might want to do.

So many of the typical career assessments, and things that you would do-- when WIOA we first came out and all assessments were kind of taken off the table outside of interest inventories, now, that door's a little wider to expand that scope to account for a lot of those different types of assessments that you do typically very early on. And again, we would say, use that sense of the purpose of the service.

We're not doing it so that we can specifically determine someone eligible, but we're doing it and we're having that student participate in an assessment, because that assessment is going to help them further identify the career interests that they might want to explore and get into. So it's hard to say specifically, because every state does assessments very differently.

And if you're in a state, you might think that the way that you call and categorize assessments is how everyone does it. And it is not. It's very, very different. So I just hesitate to kind of name an assessment, because typically, they're just very different across the states and how they implement services.

Also, I just wanted to mention, D.J., did you mention-- I'm sorry if I missed it-- the joint training we did with ETA with Title 1 Youth?

D.J. RALSTON: I did not, but I can talk a little bit about it. So some really cool stuff kind of happened behind the scenes. Although, I will say it was in the before times, so before COVID, B.C We started to work on a series between RSA and the US Department of Labor's Employment and Training Administration, who is the government agency that oversees and funds the public WIOA Title I and Title III programs.

And so in working with them, we have a couple of webinars out there on the workforce GPS website, which is Department of Labor's kind of big overarching training site, kind of their equivalent to the NCRMT if you will. And within that, there's two kind of very short 15 minute overviews. One, of VR transition services and pre-employment transition services, which all of you as folks in the VR field probably don't need, so you don't really need to watch that one.

But the one that you may want to watch actually, is the one that is from Department of Labor's Employment and Training Administration doing a 15 minute overview of the Title 1 Youth Program. So that way, you can kind of get a sense of what it is they offer. The other thing is, if you happen to attend our CBVI, our Capacity Building Virtual Institute, and you can get access to YesLMS, where all of those recorded archives live, there was a session that talked about

working with homeless youth. And the ETA Title 1 Youth folks from the US Department of Labor actually presented there talking a little bit more about the Title 1 Program there.

Yes, we will put a link to Title 1 Youth session in the chat from the Workforce GPS site. I'll land to the youth page, or link to the youth page. You do need to have a Workforce GPS site. Hey, it's free, awesome. Downside, you have to create another username and login if you haven't done it. And they make you change that every 30 days. Like really, I didn't say that.

So yes, we'll link that in there. But we also by the way, we are planning on kind of two more parts of that session, or of that kind of larger training series. So we just put the really short overviews out there to give people a foundation. Our second one was really going to focus on how these services can work together.

We like the idea that, for example, while the Title 1 Youth Program will work with out of school youth, and determine them eligible for out of school youth, oftentimes, the first thing that happens with those youth is that they become re-enrolled in some type of recognized educational program. So for those of you who are intimately familiar with pre-employment transition services, that should actually make the trip a couple of bells in your head going, wait a minute, I thought a recognized educational program.

But wait, they're an out of school youth. But actually, they stay in out of school youth just for the purposes of the ETA Title 1 Youth Program, but they're now in a recognized education program, which means they potentially could receive what?

CHRISTINE JOHNSON: Pre-employment transition services.

D.J. RALSTON: That's right. Winner, winner, chicken dinner. So we are going to talk more about that in depth in kind of that second piece. And then the last webinar in that series, we're hoping to bring in a few states who are doing this really great work already, who can share with you all as your peers.

Because we all know that it might be nice to hear it from us, but in the end, your peers are probably the most influential to help you really realize that you can do that. So I'm going to be quiet now, so I can go find that link and put it in the chat for you.

MELISSA DIEHL: No, that was great. I think honestly, that's what we really hope to do in the next couple of years under this grant, is really leverage our nontraditional partners that really should be front and center, in addition to our partners in education. Do we have any more questions we didn't address yet?

CHRISTINE JOHNSON: I don't see any in the chat or in the Q&A.

MELISSA DIEHL: So some of the things that we've started to do and work on with states, is helping states revise and implement their policies and procedures to incorporate these

additional services, and address both the auxiliary aids and services, and then the additional VR services for eligible students with disabilities.

So I'm not sure. I don't know if it'll work to just show a little note in the chat how many folks have maybe done that, or are in the process of doing that. But it is something that you're going to want to turn your attention to if you are in the state VR agency. You're going to want to make sure that you have that guidance out to staff about what these services are, and then what that looks like in terms of the tracking and reporting. Which we did drop in the FAQ from RSA that is super helpful to you.

And you're also welcome to reach out to us and our team with NTACTION so that we're more than happy to help you walk through that. But it's also going to be important to look at the costs, these additional costs. As Christine was mentioning in the video, this is all really important to get that big picture of the true impact of the delivery of pre-employment transition services on your overall program.

And if we are not tracking those costs in relation to the delivery of pre-employment transition service, we really don't have an accurate picture of what the cost per student is, and what the cost of delivering these services are overall. So that's something if you haven't done that, you're going to want to do sooner or later.

But it's also going to be important as you look at revising and updating your forecast, and determining whether or not you can move to the authorized activities, and what these additional services and the impact of those costs are on that forecast, so that you can get an accurate picture. And I think we might have a new question.

CHRISTINE JOHNSON: Yes. So someone's asked, what if a student is taking dual credit classes at a vocational institute to determine if they would be successful at a post-secondary entity once they get their high school diploma. Does that count towards our 15%?

MELISSA DIEHL: It sounds like they're in a vocational training program, which would not constitute a pre-employment transition service. So that would be outside of the scope of pre-employment transition services.

CHRISTINE JOHNSON: And we have another one. So a student with a disability has to meet the broader definition under the ADA, which defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability, but who are regarded as having a disability. This definition and required documentation is much broader than for vocational rehabilitation.

I think when we talk about the definition of auxiliary aids and services, that we're specifically pointing to that definition under the ADA. I don't think--

MELISSA DIEHL: And for the purposes of a student with a disability, because it's pointing you back to section 504 of the ADA, which you're citing. So I don't know if there's a question in there or not, or maybe that this person was clarifying something. Not sure.

CHRISTINE JOHNSON: I'm going to say that the same person has put two more follow ups here. The 18 to 21 program for the dual credit question. It's an 18 to 21 program for the dual credit.

MELISSA DIEHL: So, typically those 18 to 21 programs are on the student's IEP. And typically, those would be programs that the education entity would provide, because its relating to their educational attainment. And really, you have to go back to that purpose of what pre-employment transition services are.

It's not about getting the training. That's why post-secondary education and tuition costs are outside of the scope, because those services, now, you're in the training phase. And what pre-employment transition services are designed to do, are to provide the exploration, right.

We're trying to expand like if we're at a party, we want to get as many hors d'oeuvres on the table, so that our students can eventually choose a really great entree. And it's the hors d'oeuvres that we're talking about that are pre-employment transition services.

CHRISTINE JOHNSON: I've taught you well, Missy.

MELISSA DIEHL: Yeah, that's Christine's analogy. But I hope that answered your question.

CHRISTINE JOHNSON: The materials will all be available on the train VR website that was put in a check earlier, and probably someone's probably putting it in again. Our information is at the end of that slide presentation. And so please feel free to reach out to any of us, ask specific questions.

MELISSA DIEHL: And as our new NACT:C website is built out, we will point to this training from that website too, so that you can get direct access to it from either door. But we're planning on posting along with the PDF of the slides that we used in the presentation, the actual notice of interpretation, and the FAQ on tracking and reporting, we'll have all accessible where you registered on train VR.

SPEAKER: I think one more question in the Q&A. Sorry, Christine, maybe I spoke over you. Can you please clarify, it was my understanding the pre-employment transition services under the reserve is for 14 to 21 with an IEP 504, and/or documented disability, or in high school, or post-secondary, including vocational, technical schools, and college. Is this accurate?

MELISSA DIEHL: It could be in your state. So we always try to think about it as three little buckets. So the first is the age range, which is typically 14 to 21. Because that's typically in more states than not, what the IDEA age range is in the state. However, a VR agency could elect to choose an earlier age. Or like in Michigan, I think they have our largest span. Their age range is 14 to 26, because that's what Michigan's IDEA age range is.



So some of our states say grade nine. Some of our states will say 16 to 22. Some states specify the month that the person is enrolled. But in any case, it usually follows your IDEA age range. The second piece is the disability, which you've articulated well. It could be somebody on an IEP. Or for the purposes of 504, which gravitates to that or other documented disability.

And then the third piece is that enrollment in a recognized education program, which you're referencing as high school, or some type of a voc-tech vocational or technical school. But in our world, we consider anything that's going to yield a credential that's recognized in your state as a recognized education program. I hope that answered that question.

And I think we're at the top of the hour. So I hope this was a fun party, as fun as talking about regulations can be, and flexibilities. But I just want to thank D.J., our fabulous moderator, and John Walsh, and the CIT-VR for hosting us today.

And please reach out to us. We can drop our contact information in the chat if you have any questions, or you want to follow up, or have a conversation.

CHRISTINE JOHNSON: Yeah, thank you all again. Have a great day.