

MONTANA VOCATIONAL REHABILITATION AND BLIND SERVICES



PRE-EMPLOYMENT TRANSITION SERVICES GUIDE

Montana Vocational Rehabilitation and Blind Services Pre-Employment Transition Services



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Section 1

Pre-Employment Transition Services Policy and Procedure Guide

Background and Overview

The Rehabilitation Act of 1973 as amended by the Workforce Innovation and Opportunity Act (WIOA) includes many initiatives to ensure that individuals with disabilities have the opportunity to secure high quality employment, independence and integration. With the passage of WIOA, there is a renewed emphasis on services to students with disabilities. Vocational Rehabilitation agencies are now required to set aside at least 15 percent of their federal funds for the provision of Pre-Employment Transition Services (Pre-ETS) for students with disabilities.

In order to accomplish this task, Montana Vocational Rehabilitation and Blind Services (VRBS) has chosen to utilize four service strategies. Montana Vocational Rehabilitation and Blind Services identified these four strategies based on the assessment of need for Pre-Employment Transition Services for students with disabilities in Montana.

- The first strategy is the direct provision of Pre-Employment Transition Services by VRBS Vocational Rehabilitation Counselors and tracking the time spent on these activities.
- The second strategy is purchasing Pre-ETS through Community Rehabilitation Programs, Independent Living Centers and other providers.
- The third strategy is making funds available to school districts to build and enhance transition services by providing Pre-ETS in their schools.
- The fourth strategy is providing funding for special projects such as the Montana Youth Leadership Forum, Montana Youth Transitions, Movin' On at Montana State University (MSU) and Movin' On at the University of Montana (U of M). These are independent programs that assist Montana students by preparing them for college, life and careers.

Vocational Rehabilitation and Blind Services is committed to providing Pre-Employment Transition Services to students throughout the state including the most rural and remote places in Montana. The other underlying principle for Montana's Pre-ETS program is the focus on competitive integrated work goals.

Target Population for Pre-Employment Transition Services

Pre-employment transition services are provided to "students with disabilities" who are:

- Eligible for VR services; or
- Potentially eligible for VR services.

"Student with a disability" is an individual who:

- Is in a secondary, postsecondary or other recognized education program and
- Is not younger than 14 years of age
- Is not older than 21 years of age
- Is eligible for and receiving special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.); or is an individual with a disability

receiving services under a section 504 plan; or is an individual with a documented disability who does not have a section 504 accommodation and is not receiving services under an IEP.

Potentially eligible students are defined as:

- All students with disabilities, regardless of whether they have applied for or have been determined eligible for the VR program.

Students who exit secondary education and enroll in a postsecondary program are:

- Eligible to receive Pre-ETS in the summer between High School and College.
- Able to receive any or all Pre-ETS that they need as long as they meet the age range.
- Required to provide documentation of acceptance into a postsecondary program.

Students who take a “gap year” delaying their postsecondary program start date are:

- Eligible to receive Pre-ETS if they provide the following documentation:
 - Documentation of graduation from secondary education;
 - Documentation of acceptance into a post-secondary education institution/program;
 - Documentation of confirmation that they had accepted the invitation to enter the post-secondary program; and
 - Documentation that their “seat” or “spot” is being held for them.

Secondary, postsecondary or other recognized education programs include:

- Secondary school: High Schools, Home schools and alternative school programs within the juvenile justice system and residential treatment facilities
- Post-secondary education program: Colleges, Vocational Technical Schools and programs approved by the state’s Higher Education Commission
- Education program: Recognized certificate programs leading to a credential (e.g. Certified Nursing Assistant, Phlebotomy Technician, Microsoft Certification). This also includes adult basic educational programs which lead to a recognized educational credential such as the hi-set.

Please refer to the following resources in the Forms Appendix:

Pre-ETS Key Terms and Definitions

Pre-Employment Transition Services Required Activities

Pre-Employment Transition Services are provided or coordinated by VRBS to give students an introduction to work, help them make informed job choices, learn good work habits, and get real work experience. Pre-Employment Transition Services may be provided in a group and/or an individualized setting to students with disabilities who need them. VRBS makes all of these services available statewide in collaboration with state and local education agencies, community rehabilitation providers, independent living programs, institutions of higher education and other transition stakeholders.

The five required Pre-Employment Transition Services include:

1. Job Exploration Counseling - Job Exploration Counseling is meant to provide students with a variety of opportunities to gain information about careers, the skills needed for different jobs and to uncover personal career interests. If provided as pre-employment transition services, job exploration counseling may be provided in a group setting or on an individual basis, and may include information

regarding in-demand industry sectors and occupations, as well as non-traditional employment, labor market composition and vocational interest inventories to assist with the identification of career pathways of interest to the students.

2. Work based learning - Work Based Learning (WBL) is an educational approach or instructional method that uses community workplaces to provide students with the knowledge and skills that will help them connect school experiences to real-life work activities and future career opportunities. WBL may include in-school or after-school opportunities, experiences outside the traditional school setting, and/or internships. If work-based learning experiences are paid, the students with disabilities will earn competitive wages or stipends commensurate with wages or stipends paid to students without disabilities participating in similar experiences.

3. Counseling on opportunities for enrollment in comprehensive transition or post-secondary education programs at institutions of higher education - information and guidance on a variety of post-secondary education and training opportunities. These services may include information on course offerings, career options, types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with a career field or pathways. It may also include advising students and family members on academic curricula, college application and admissions processes, completing the Free Application for Federal Student Aid (FAFSA), and resources that may be used to support individual student success in education and training, to include disability support services.

4. Workplace readiness training to develop social skills and independent living - Workplace readiness traits describe a number of skills that employers expect from most employees. Workplace readiness skills are a set of skills and behaviors that are necessary for any job, such as how to interact with supervisors and co-workers and the importance of timeliness. These skills are sometimes called soft skills, employability skills, or job preparation skills. These skills help students learn and build an understanding of how we are perceived by others.

5. Self-advocacy skills – includes an individual’s ability to effectively communicate, convey, negotiate or assert his/her own interests and/or desires; develop self-determination; enable students to advocate for any support services, including auxiliary aids, services, and accommodations that may be necessary for training or employment.

- Knowledge of self
- Knowledge of rights and responsibilities
- Communication skills
- Leadership skills

Pre-Employment Transition Services Authorized Activities

Funds remaining after the provision of the required Pre-ETS activities may be used to improve the transition of students with disabilities from school to postsecondary education or an employment outcome by:

(1) implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces;

- (2) developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently, participate in postsecondary education experiences, and obtain, advance in and retain competitive integrated employment;
- (3) providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities;
- (4) disseminating information about innovative, effective, and efficient approaches to achieve the goals of this section;
- (5) coordinating activities with transition services provided by local educational agencies under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);
- (6) applying evidence-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to better achieve the goals of this section;
- (7) developing model transition demonstration projects;
- (8) establishing or supporting multistate or regional partnerships involving States, local educational agencies, designated State units, developmental disability agencies, private businesses, or other participants to achieve the goals of this section; and
- (9) disseminating information and strategies to improve the transition to postsecondary activities of individuals who are members of traditionally unserved and underserved populations.

Pre-Employment Transition Services Coordination Activities

VRBS will make every effort to coordinate with workforce development partners, the state education agency, local schools, post-secondary education programs and other stakeholders. The Pre-Employment Transition Services coordination activities include:

1. Attending individualized education program meetings for students with disabilities, when invited;
2. Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
3. Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
4. When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

Outreach and Coordination

- VRBS assigns a Vocational Rehabilitation Counselor to each high school in the state. Counselors shall inform students, families, special and regular education teachers, school administrators, advocacy groups, and others about VRBS.
- Counselors will give presentations and distribute both print and electronic materials that explain transition and pre-employment services along with traditional vocational rehabilitation services. The information provided will include a description of the purpose of VRBS, eligibility requirements, application procedures and scope of services that may be provided to eligible and potentially eligible individuals.

- VRBS will reach out to eligible and potentially eligible students with disabilities who are in need of transition services and Pre-ETS as early as possible through outreach activities such as information sharing at IEP's, transition planning meetings, career fairs, orientations, back to school nights, work with parent support groups, and other activities.
- VRBS Counselors will work with local school staff to identify and reach out to all students with disabilities to include those served in special education, those receiving an accommodation under Section 504 of the Rehabilitation Act, and other students and youth with disabilities. Outreach activities will include students with disabilities receiving school psychological, health, nursing or social work services, and students with disabilities enrolled in an educational program and not in special education. VRBS will also reach out to youth with disabilities who have dropped out of an education program or students who are at risk of dropping out of high school.
- VRBS will inform students with disabilities about the availability of and opportunities to exercise informed choice; including the availability of support services for individuals with the most significant disabilities who require assistance in exercising informed choice throughout the vocational rehabilitation process.
- The designated VRBS Counselor will work closely with each local school to coordinate, identify students and implement pre-employment transition services. VRBS will provide the necessary forms and templates for required documentation including Student Request Forms for pre-employment transition services.

Provision of Reasonable Accommodation, Auxiliary Aids and Services

No qualified student with a disability is denied pre-employment transition services on the basis of their disability. If a student with a disability requires a reasonable accommodation, auxiliary aid or other service in order to access or participate in a pre-employment transition service, VRBS may provide the required accommodation when no other entity is responsible for its provision. Reasonable accommodation, auxiliary aids and services shall be provided in accordance with VRBS's policies and procedures.

Pre-Employment Transition Services funds may not be used to purchase or modify a student's personal equipment or devices. Auxiliary aids and services for Pre-Employment Transition Services do not include:

- Personal devices (e.g. computers, laptops, tablets)
- Prescribed devices (e.g. eyeglasses, hearing aids, wheelchairs)
- Readers for personal use or study
- Home or vehicle modifications
- Attendant care or other services

Pre-ETS Process for Potentially Eligible Students with Disabilities

A referral for Pre-Employment Transition Services may be submitted by school personnel, family members, post-secondary education programs, stakeholders or other interested persons. Potentially eligible students with disabilities are not required to apply for or be determined eligible for vocational rehabilitation services before receiving pre-employment transition services. Students who have provided adequate documentation of their disability and enrollment in a recognized education program shall not

have their participation in pre-employment transition services delayed by the process of applying for vocational rehabilitation services. Students who do not apply for vocational rehabilitation services may continue to receive pre-employment transition services as long as they continue to satisfy the definition of a “student with a disability.”

A potentially eligible student with a disability:

- Is a student with a documented disability who is in a secondary, postsecondary or other recognized education program
- Is 14 through 21 years of age
- Has not applied for and been determined eligible for VR Services, is not on the OOS waiting list and is not currently receiving VR Services

Pre-ETS Counselor Process

The VRBS counselor educates referral sources on the criteria for a student to be considered “potentially eligible”. The referral sources identify students who meet the criteria and connects them to VRBS by either:

1. Having them complete a Student Request Form which will be shared with VRBS.
2. Coordinating student and parent/guardian contact with a VRBS counselor to complete forms, giving them a copy of the Client Assistance Program brochure and signing relevant releases.
3. Giving the student a VRBS letter and packet of relevant information to help them initiate contact with VRBS. They are provided more information about Pre-ETS and the VRBS program.

A Student Request Form will be completed electronically or through a paper request form. The Student Request Form will include the following information:

- Social Security number
- Date of Birth
- Race and ethnicity
- Disability
- Contact Information
- Grade Level and expected graduation date
- Description of each Pre-Employment Transition Service
- Specific Pre-Employment Transition Services requested by the student
- Parent/student consent

If the Request Form is being completed with the assistance of school personnel, they verify that the individual meets the definition of a student with a disability and there is available documentation supporting that the student is a student with a disability for the purposes of section 504, receiving services under IEP or a student with a documented disability (not receiving 504 accommodations or services under an IEP). The statement from the school personnel is sufficient documentation that the student meets the criteria for a student with a disability.

If the Request Form is being completed by non-school personnel, one of the following supporting documents must be provided to VRBS with the request form:

- Copy of Individualized Education Program (IEP) or 504 Accommodation

- School records/statement from school personnel
- Proof of receipt of SSI/SSDI Benefits based on individual's own disability
- Medical or psychological documentation signed by a licensed professional

Review and Approval

VRBS Staff will review the Request Form and any supporting document to confirm that the individual meets the definition of a student with a disability.

VRBS Staff will ensure that the student has reviewed information about Pre-Employment Transition Services and requested specific services.

VRBS Staff will indicate whether they are in agreement that the requested Pre-Employment Transition Services are appropriate and necessary for the student to prepare for life after high school.

If the VRBS Staff is in agreement, the form will be signed, and a copy sent back to the referral source.

If there is any concern regarding the student's Request Form, disability status, parent/guardian consent, social security number, or need for Pre-Employment Transition Services the VRBS Counselor/Counselor Supervisor will contact the referral source for clarification and additional information.

Service Provision

Potentially eligible students can receive one or more Pre-Employment Transition Services depending on their need and interest. For potentially eligible students who will receive individual VRBS Pre-Employment Transition Services, the counselor will take the following steps:

- The VRBS Counselor will create a special Pre-ETS hard file according to the Pre-ETS Case Filing Guide.
- The file will be a different color or have a special sticker to help staff easily discern that the individual is receiving Pre-Employment Transition Services as a potentially eligible student with a disability.
- The Case notes will be generated as a Word document. They will have a Pre-ETS heading and will be filed on Side 1. Pre-ETS activities, progress, comparable benefits and counselor's direct provision of Pre-ETS will be documented in the case notes.
- The remaining Pre-ETS materials will be filed as outlined in the VRBS Case Filing Guide.

Pre-Employment Transition Services can be provided through contracts with local high schools, through special project contracts (MYLF, MYTransitions, Movin' On), through direct provision of services by a VRBS counselor, through comparable benefits and through an approved provider who has a contract to provide Pre-ETS.

If the student expresses interest in receiving specific Pre-ETS services, the VR counselor will determine how and who can provide the services (i.e. VR Counselor, Provider, Teacher, etc.). The student and parent will choose their preference when multiple providers exist. The VR counselor will then have the student and parent sign a release of information for the school and any vendor providing a Pre-ETS service to that student.

The VR counselor creates a referral including relevant information to send to the provider. This information can include:

- Students Name, SSN, DOB
- Students Contact Information (Address, Phone Number, Email)
- Students' Disability Information
- A copy of the IEP and Evaluation Reports
- Specific Interest Inventories, Resumes, Summaries/Recommendations from other PreETS services and/or providers
- Releases of Information
- Purchase Order showing the specific Pre-ETS service, hours approved, and rate per hour

VRBS Counselors purchase Pre-ETS through a contracted Pre-ETS provider using the PERQS Unique ID and Authorization form. (This process is outlined under the Pre-ETS Authorization and Data Management section of this manual.) The counselor will ensure that services meet the definition of Pre-ETS as outlined in the Allowable and Unallowable Pre-ETS Services Chart. The counselor will review the Pre-ETS and transition services offered through the local high school to ensure that the purchased services are not a duplication of services already being provided. The VRBS Counselor will also follow up with the student, parents, and provider to ensure that the Pre-ETS that have been authorized are high quality and meeting the needs of the student. Subsequent meetings will be scheduled to review and provide recommendations or to set up additional Pre-ETS.

At the end of each quarter, the Counselor will complete a Student Quarterly Report for every student who received Pre-ETS provided directly by the counselor or through comparable benefits. The Student Quarterly Report will be sent to the Pre-ETS Technician who will enter the information into the quarterly RSA-911 data report.

Please refer to the following resources in the Forms Appendix:

- Case Filing Guide
- Letter of Introduction
- Student Quarterly Report for Pre-ETS
- Student Request Form

Initiating Application for Vocational Rehabilitation Services

VRBS Counselors shall encourage interested students to complete a VRBS application to facilitate a smooth transition into vocational rehabilitation services. Students who apply and are determined eligible for vocational rehabilitation services will be assigned to an Order of Selection category based on the significance of disability. (See MVR Policy 7.2.)

Students who apply for vocational rehabilitation services and are determined ineligible, cease to be considered potentially eligible and are therefore not able to continue to receive Pre-Employment Transition Services. Pre-Employment Transition Services should cease as soon as the ineligibility determination is made.

Pre-ETS Process for Individuals Assigned to an Open Order of Selection Category

An eligible student with a disability assigned to an Open Order of Selection Category:

- Is a student with a documented disability who is in a secondary, postsecondary or other recognized education program
- Is 14 through 21 years of age
- Has applied for VRBS services and been determined eligible
- Has been assigned to an Open Order of Selection Category

Pre-ETS Counselor Process

The Pre-Employment Transition Services materials will be included in the Vocational Rehabilitation case file. The file will be a different color or have a special sticker to help staff easily discern that the individual is receiving Pre-Employment Transition Services. The Case notes referring to Pre-Employment Transition Services will have a Pre-ETS heading and will be filed with the VR case notes. Pre-ETS activities, progress, comparable benefits and counselor's direct provision of Pre-ETS will be documented in the case notes. The remaining Pre-ETS materials will be separated from the VR materials through dividers as outlined in the VRBS Case Filing Guide.

Eligible students assigned to an open order of selection category will have pre-employment transition services included on the Individualized Plan for Employment (IPE). The individual can receive Pre-ETS under an IPE as long as the individual continues to meet the definition of a "student with a disability."

The IPE must be developed as early as possible in the transition process and should be completed before the student exits high school. As with any eligible VRBS client, the IPE must be developed within 90 days of an eligibility determination unless the student agrees to a specific time extension.

Vocational counseling and guidance must be provided prior to IPE development. Every effort will be made to identify a specific goal or a projected goal within a particular field. An IPE with a projected goal should outline the activities that will guide the student's career exploration and identification of a vocational goal based upon informed choice. The projected goal will be revised to a specific vocational goal once the career exploration process is complete.

Due to the limitations of the current Montana case management program, Pre-ETS is not included as a service category and does not have a budget line. All Pre-ETS will be included in the IPE as an "Other" service. Some examples are:

Other Service: Pre-ETS Work Based Learning--5 hours to set up job shadow site

Other Service: Pre-ETS Work Based Learning--20 hours of work site training

Other Service: Pre-ETS Instruction in Self Advocacy

Other Service: Pre-ETS Work Based Learning—80 hours of wages

If a student is in high school, the IPE also needs to include:

Miscellaneous Training: High School Diploma

The Counselor demonstrates that the student is achieving the VRBS program's policies for academic standards by recording the most recent date of the individual's transcript or report card for secondary

education for one semester in the MACS case management system. Supporting documentation can include a copy of a semester transcript or report card.

Pre-Employment Transition Services can be provided through contracts with local high schools, through special project contracts (MYLF, MYTransitions, Movin' On), through direct provision of services by a VRBS counselor, through comparable benefits and through an approved provider who has a contract to provide Pre-ETS.

If a student is interested in receiving specific Pre-ETS services, the VR counselor will work with the student and parents to determine how and who will provide the services (i.e. VR Counselor, Provider, Teacher, etc.). The student and parent will choose their preference when multiple providers exist. The VR counselor will then have the student and parent sign a release of information for the school and any vendor providing a Pre-ETS service to that student.

The VR counselor creates a referral including relevant information to send to the provider. This information can include:

- Students Name, SSN, DOB
- Students Contact Information (Address, Phone Number, Email)
- Students' Disability Information
- Initial Contact Memo from MACS case management system
- A copy of the IEP and Evaluation Reports
- Specific Interest Inventories, Resumes, Summaries/Recommendations from other PreETS services and/or providers
- Releases of Information
- Purchase Order showing the specific PreETS service, hours approved, and rate per hour

VRBS Counselors purchase Pre-ETS through a contracted Pre-ETS provider using the PERQS Unique ID and Authorization form. (This process is outlined under the Pre-ETS Authorization and Data Management section of this manual.) The counselor will ensure that services meet the definition of Pre-ETS as outlined in the Allowable and Unallowable Pre-ETS Services Chart. The counselor will review the Pre-ETS and transition services offered through the local high school to ensure that the purchased services are not a duplication of services already being provided. The VRBS Counselor will also follow up with the student, parents, and provider to ensure that the Pre-ETS that have been authorized are high quality and meeting the needs of the student. Subsequent meetings will be scheduled to review and provide recommendations or to set up additional Pre-ETS.

At the end of each quarter, the Counselor will complete a Student Quarterly Report for every student who received Pre-ETS provided directly by the counselor or through comparable benefits. The Student Quarterly Report will be sent to the Pre-ETS Technician who will enter the information into the quarterly data report.

Please refer to the following resources in the Forms Appendix:

Case Filing Guide

Eligibility letter for students receiving Pre-ETS

Student Quarterly Report for Pre-ETS

Pre-ETS Process for Individuals Assigned to a Closed Order of Selection Category

Eligible students assigned to a closed order of selection category and placed on a waiting list for vocational rehabilitation before receiving pre-employment transition services may not receive pre-employment transition services while they are on the waiting list. These students will be required to wait for pre-employment transition services until they are removed from the waiting list and an Individualized Plan for Employment can be developed.

Eligible students assigned to a closed order of selection category and placed on a waiting list for vocational rehabilitation after receiving pre-employment transition services may continue to receive pre-employment transition services. (Refer to the “Black Hole Procedure” on page 20 later in this document to ensure that Pre-ETS are provided prior to eligibility determination.)

An eligible student with a disability assigned to a Closed Order of Selection Category:

- Is a student with a documented disability who is in a secondary, postsecondary or other recognized education program
- Is 14 through 21 years of age
- Has applied for VR services and been determined eligible
- Has a disability priority category that is not able to be served at this time and is currently on the waiting list for VR services.

Pre-ETS Counselor Process

When a student with a disability has received Pre-ETS prior to the determination of eligibility and assignment to a closed priority category, he or she will be able to continue to receive Pre-ETS and will be sent a Pre-ETS eligibility letter. This letter provides information about their waiting list status for VR services but also lets them know they are eligible to continue receiving Pre-Employment Transition Services as a student with a disability.

The Pre-Employment Transition Services materials will be included in the Vocational Rehabilitation 04 Waiting List case file. The file will be a different color or have a special sticker to help staff easily discern that the individual is receiving Pre-Employment Transition Services. The Case notes referring to Pre-Employment Transition Services will have a Pre-ETS heading and will be filed with the VR case notes on Side 1. Pre-ETS activities, progress, comparable benefits and counselor’s direct provision of Pre-ETS will be documented in the case notes. The remaining Pre-ETS materials will be separated from the VR materials through dividers as outlined in the VRBS Case Filing Guide.

Pre-Employment Transition Services can be provided through contracts with local high schools, through special project contracts (MYLF, MYTransitions, Movin’ On), through direct provision of services by a VRBS counselor, through comparable benefits and through an approved provider who has a contract to provide Pre-ETS.

If a student is interested in continuing to receive Pre-ETS services, the VR counselor will work with the student and parents to determine how and who will provide the services (i.e. VR Counselor, Provider, Teacher, etc.). The student and parent will choose their preference when multiple providers exist. The VR counselor will then have the student and parent sign a release of information for the school and any vendor providing a Pre-ETS service to that student.

The VR counselor creates a referral including relevant information to send to the provider. This information can include:

- Students Name, SSN, DOB
- Students Contact Information (Address, Phone Number, Email)
- Students' Disability Information
- Initial Contact Memo from MACS
- A copy of the IEP and Evaluation Reports
- Specific Interest Inventories, Resumes, Summaries/Recommendations from other PreETS services and/or providers
- Releases of Information
- Purchase Order showing the specific PreETS service, hours approved, and rate per hour

VRBS Counselors purchase Pre-ETS through a contracted Pre-ETS provider using the PERQS Unique ID and Authorization form. (This process is outlined under the Pre-ETS Authorization and Data Management section of this manual.) The counselor will ensure that services meet the definition of Pre-ETS as outlined in the Allowable and Unallowable Pre-ETS Services Chart. The counselor will review the Pre-ETS and transition services offered through the local high school to ensure that the purchased services are not a duplication of services already being provided. The VRBS Counselor will also follow up with the student, parents, and provider to ensure that the Pre-ETS that have been authorized are high quality and meeting the needs of the student. Subsequent meetings will be scheduled to review and provide recommendations or to set up additional Pre-ETS.

At the end of each quarter, the Counselor will complete a Student Quarterly Report for every student who received Pre-ETS provided directly by the counselor or through comparable benefits. The Student Quarterly Report will be sent to the Pre-ETS Technician who will enter the information into the quarterly data report.

Please refer to the following resources in the Forms Appendix:

Case Filing Guide

Eligibility letter for students receiving Pre-ETS

Student Quarterly Report for Pre-ETS

Coordinating Group Pre-ETS Activities Provided by a CRP in a High School

1. If the school communicates with the VRBS counselor that they are interested in a CRP coming into their class and providing a group service to all of their students in that class, the VRBS counselor will need to contact the CRP to discuss details.
2. Communication with the CRP needs to emphasize that in order for VRBS to set up a Purchase Order (PO) for each individual student, the student will need to meet the definition of a student with a disability. The services can be provided to potentially eligible students with disabilities who have completed the Student Request Form or eligible students who are currently receiving services/on the waiting list for VRBS. All services with the CRP need to be authorized in writing in advance. Only students with disabilities can be present to benefit from the Pre-ETS.

3. The Counselor will ensure that the CRP understands that there may be students in the class that do not fit this criteria for a student with a disability and therefore cannot be billed for.
4. The Counselor will explain to the teacher that a release of information for VRBS and for the CRP will need to be signed by the student and parent/guardian.
5. Once these releases have been obtained by the VRBS counselor, a PERQS PO can be set up for each eligible student that meets the criteria.
6. The CRP may not bill VRBS for any services until the counselor has received the necessary information, approved and set up a PERQS PO for the student.

Note: The CRP is required to maintain a ratio that is no greater than 6:1 for students to staff during each Pre-ETS group activity. For instances where some students are not billable, school staff such as the teacher or a para educator can fulfill the staff ratio requirement.

Example: 12 students are in the class, but only 6 are billable due to meeting the criteria described above. There will need to be at least 2 staff members instructing the group activity. The CRP will need to provide at least 1 staff member from their agency, and a school staff member can count as the other staff member required to ensure the 6:1 ratio.

If all 12 students are billable, then the CRP is required to have at least 2 staff members from their agency that are providing the group service.

Pre-ETS Black Hole Procedure

A Vocational Rehabilitation program implementing an Order of Selection (OOS) is required to continue to provide Pre-Employment Transition Services (Pre-ETS) to students with disabilities who have begun receiving these services prior to the determination of eligibility and assignment to a closed priority category. The “Pre-ETS Black Hole” is a situation in which a client may not be able to participate in Pre-ETS activities if found eligible for Vocational Rehabilitation services and put on an Order of Selection waiting list prior to receiving a Pre-ETS service.

Example: Emily, a freshman age 14, applied for services on the basis of migraines. Vocational Rehabilitation and Blind Services (VRBS) is in an Order of Selection with all categories closed. Emily was found eligible and placed into priority category 3 and is now on the VRBS waiting list. Emily’s school is in a contract with Vocational Rehabilitation to provide Pre-ETS, but Emily did not receive the services last year as she was in the 8th grade. Emily now cannot receive Pre-ETS while she waits for VRBS services.

Emily is now in the black hole. This scenario is not limited to just young students. It may relate to a young person who is attending a school that does not currently have a Pre-ETS contract, but chooses to enter into one at a later date. In order to ensure that potential clients are able to receive Pre-Employment Transition Services, the Pre-ETS Black Hole Procedure was developed. The procedure is intended for students with disabilities ages 14-21 who are in a secondary, postsecondary, or other recognized education program. It is implemented prior to a student’s determination of eligibility for VRBS services.

Procedure: The VRBS Counselor will verify that the student received a Pre-ETS service from any source (Schools, Independent Living Center, Montana Youth Leadership Forum (MYLF),

MYTransitions, Movin' On, etc.). The counselor will ensure that the service was provided to the student prior to making them eligible for VRBS services. The verification will be documented in a contact memo titled Pre-Employment Transition Services. Available Pre-ETS Verification documentation will be filed under side 3 in the Case file.

If a student applies for VRBS services and has never received Pre-ETS, the counselor can provide the Pre-Employment Transition Service themselves prior to an eligibility decision. The counselor can complete a Montana Career Information Systems (MCIS) activity with the student. Other acceptable Pre-ETS activities include the Job-Related Interest and Preference Inventory and Steps to Self-Advocacy which are included in the Forms Appendix. Many other appropriate Pre-ETS activities can be found at: <http://www.wintac.org/topic-areas/pre-employment-transition-services/resources>. The delivery of a Pre-Employment Transition Service will be documented in a contact memo titled Pre-Employment Transition Services. Evidence of the service delivery will be printed for the case file and filed under side 3 in the Case file.

Please refer to the following resources in the Forms Appendix:

FAQ regarding the continuation of Pre-ETS under OOS

Job Related Interest and Preference Inventory

Steps to Self-Advocacy

Financial Responsibility for Pre-Employment Transition Services

Pre-Employment Transition Services are exempt from financial participation, regardless of whether or not the student is exempt based on financial need. However, the financial needs test will apply to all other services included on the student's IPE.

- The VRBS financial needs test does not apply to a potentially eligible student.
- The agency's financial needs test will also not apply to students who are eligible for VRBS when the student only participates in Pre-Employment Transition Services or when the student requires reasonable accommodations/auxiliary aids and other necessary support services to participate. Examples of Pre-Employment Transition Services that do not require completion of a financial summary include work-based learning, wages for the work-based learning experience, a soft skills class and training in self advocacy.
- Prior to completion of an IPE, VRBS requires students to complete Form 4 MVR Financial Form as outlined in VRBS Policy 2.3 to determine the possibility of a family contribution for traditional VRBS services.
- Those individuals who can demonstrate proof of eligibility for SSI or SSDI benefits are presumed to be financially eligible and are not required to complete a Financial Form.

Allowable and Unallowable Pre-ETS Activities

Pre-Employment Transition Services (Pre-ETS) are designed to be an early start to job exploration for students with disabilities and should enrich, not delay, transition planning, application to the VR program, and the continuum of vocational rehabilitation services necessary for movement from school to post-school activities. Pre-ETS begin the early phase of job exploration.

Job Exploration Counseling may include, but is not limited to:

- Review of information regarding in-demand industry sectors and occupations, as well as nontraditional employment
- Administration of vocational interest inventories and provision of Local labor market information that applies to the student’s particular interests
- Identification of career pathways of interest to the students

Work-Based Learning Experiences may include opportunities that are available in school, after school, or outside the traditional school setting; however, they must be provided in an integrated setting in the community to the maximum extent possible. Services may include but are not limited to:

- Coordinating a school based program of job training and information interviews to research employers
- Work-site tours to learn about necessary job skills
- Job shadowing
- Mentoring opportunities
- On-site work-based experiences, paid or unpaid (i.e. Internships, volunteering, practicums, or service learning opportunities)

Counseling on Opportunities for Enrollment in Comprehensive Transition or Post-Secondary Education Program may include, but is not limited to:

- Exploring the types of academic and occupational training needed to succeed in the workplace
- Postsecondary opportunities associated with career fields or pathways
- Self-advocacy skills for the purpose of identifying accommodations and services in an educational program as well as providing resources that may be used to support individual student success in education and training (i.e., disability support services)
- Advising students and parents or representatives on academic curricula and course offerings
- Providing information about college application and admissions processes
- Counseling on completing the Free Application for Federal Student Aid (FAFSA)

Workplace Readiness Training to develop social skills and independent living skills necessary for employment may include, but are not limited to:

- Learning communication and interpersonal skills
- Financial literacy, including benefits planning services
- Orientation and mobility skills to access workplace readiness training or to learn to travel independently
- Job-seeking skills
- Understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment
- On-site workplace readiness training during a work-based learning experience. Offer soft skills training to facilitate awareness of social skills and personal strengths and challenges in the workplace

Instruction in Self-Advocacy may include, but is not limited to:

- Learning about their rights and responsibilities
- Learning how to request accommodations, services or supports
- Mentoring with education staff (e.g., principals, nurses, teachers or office staff)
- Peer mentoring with individuals employed by or volunteering for employers; boards, associations, or organizations in integrated community settings
- Participating in youth leadership activities offered in educational or community settings

Services that are not allowable include:

Job Coaching, Student Transportation, Room and Board, Assessments, Individualized Assistive Technology, Post-Secondary Tuition, Registered Apprenticeships, and Vehicle Modifications

**For students found eligible for VRBS services, these costs may be covered under an approved IPE via non-Pre-ETS funds.*

Please refer to the following resources in the Forms Appendix:

Ideas for Pre-Employment Transition Services

Authorization Guidelines

Allowable and Unallowable: Frequently Asked Questions

Allowable and Unallowable Pre-ETS Services Chart

Discontinuation of Pre-ETS and/or Closure of Case

Potentially Eligible Students

Pre-Employment Transition Services end and the case is closed in the following circumstances:

- The student no longer meets the definition of a “student with a disability”
 - The student turns 22 years old.
 - The student is no longer participating in a secondary or post-secondary training program and does not intend to pursue additional qualifying education or training.
- The student no longer has a need to receive Pre-ETS; their Pre-ETS needs have been met.
- The student is no longer interested in receiving Pre-ETS and requests their PE case be closed.
- The student chooses to apply to the VRBS program.

Exit Process:

- For a student with a disability who solely received pre-employment transition services and who has not applied or been determined eligible to receive other VRBS services, the service record is closed when the student is no longer receiving such services as indicated in the Pre-ETS Data Report. The student will remain in the Pre-ETS Student Database but will be removed from the Quarterly Pre-ETS Data Report when their Pre-ETS case service record is closed, and they have exited the program. At the time of service discontinuation, the VRBS staff person should make every attempt to contact the individual to notify them that they are no longer eligible to receive Pre-ETS.

Students on the Waiting List or Receiving Services Under an IPE

If a student has become eligible for VR services and is on a waiting list in a closed order of selection category, they may continue to receive Pre-ETS if they were receiving them prior to the determination of eligibility. For both students on the waiting list or students who are receiving services under an

Individualized Plan for Employment (IPE), the Pre-Employment Transition Services shall cease to be provided in the following circumstances:

- The student no longer meets the definition of a “student with a disability”
 - The student turns 22 years old.
 - The student is no longer participating in a secondary or post-secondary training program and does not intend to pursue additional qualifying education or training.
- The student no longer has a need to receive Pre-ETS; their Pre-ETS needs have been met.
- The student is no longer interested in receiving Pre-ETS and requests their case be closed.

Exit Process:

- The student’s case will remain open on the waiting list or as an individual receiving services.
- The correct Pre-ETS Codes will be used on the Data Report to indicate that the individual is no longer receiving Pre-ETS on the waiting list or under an IPE.
- At the time of service discontinuation, the VRBS staff person should make every attempt to contact the individual to notify them that they are no longer eligible to receive Pre-ETS.
- The counselor documents in the case note that no further Pre-Employment Transition Services are taking place.
- The eligible student’s service record is closed" when the student satisfies the definition of "exit" at 34 CFR 361.150(c) because his or her service record is closed pursuant to 34 CFR 361.43 or 361.56. Closure procedures are outlined in Chapter 6 of the VRBS Counselor Manual.

Procedures for Pre-ETS Time Tracking

As of July 22, 2014, the Workforce Innovation and Opportunity Act (WIOA) requires vocational rehabilitation (VR) agencies to set aside at least 15% of their federal funds to provide Pre-Employment Transition Services (Pre-ETS) to students with disabilities who are eligible or potentially eligible for VR services. One of the strategies for delivering Pre-ETS in Montana is the provision of Pre-Employment Transition Services by VRBS Counselors and other staff.

Vocational Rehabilitation Counselors (VRCs) may charge staff time when providing or arranging for pre-employment transition services to eligible or potentially eligible students with disabilities (see definitions on pages 8-9). Funds reserved for the provision of Pre-ETS may not be used to pay for any administrative costs as defined in section 7(1) of the Rehabilitation Act and §361.5(c)(2)), such as the salaries for the VR counselor’s clerical assistant or supervisor and expenses related to program planning, development, monitoring, and evaluation.

Every employee of VRBS that spends time directly providing or arranging for the provision of Pre-ETS is required to complete bi-weekly Time Tracking Forms detailing their time that is spent on the following five required pre-employment transition services activities:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy

In addition to tracking and recording staff time for the direct provision, or arrangement of, one or more of the five required pre-employment transition services, VRBS staff must also track and record time spent carrying out any of the following pre-employment transition coordination activities:

- Attending individualized education program meetings for students with disabilities;
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities;
- Working with schools to coordinate and ensure the provision of pre-employment transition services;
- Attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.).

Staff must also document travel time associated with the provision of the required Pre-ETS activities and the coordination activities. These activities may be documented in the staff's calendars/schedules and supervisors will verify time recorded is accurately documented on the timesheet when they review and approve time sheets. Staff will use a Pre-ETS task profile ID when recording their Pre-ETS time in the ISERV timesheet and travel system. If the counselor is traveling to provide Pre-ETS as well as other VRBS services, then the travel time should be allocated in accordance with the proportional benefit of the program or activities. If 50% of the time is for other VR services and 50% is for Pre-ETS then travel time should be documented accordingly.

All Time Tracking Forms must be signed by the staff member and their supervisor. The Supervisor will store the original Time Tracking Forms for each employee. Copies of the forms are then submitted electronically to the Chief of Field Services for further review, before they are sent to Division's Financial Manager. A query is pulled at least quarterly from payroll activity to identify staff time charged to the provision and coordination of Pre-ETS activities. This data is utilized when calculating total Pre-employment Transition Services spent for the period and is included in the total Pre-employment Transition Services amount reported on the SF-425.

Please refer to the following resources in the Forms Appendix:

Counselor Time Tracking Form for Pre-ETS and Coordination Activities (Electronic Version)

Counselor Time Tracking Form for Pre-ETS and Coordination Activities (Print Version)

WINTAC Time Allocation Guide

Procedures and Documentation for Youth to Enter Subminimum Wage

(Section 511)

The goal of VRBS is competitive integrated employment. VRBS funds are not intended to be used to facilitate placements that are not integrated or for employment paid at subminimum wage. Subminimum wage employers are prohibited from hiring any individual with disabilities who is 24 years of age or younger at subminimum wage, unless they have met specific requirements. When VRBS is made aware that a youth wishes to enter subminimum wage employment, VRBS is responsible for providing the youth with documentation that they have completed the necessary activities.

Step 1: The VRBS program must obtain documentation of the completion of pre-employment transition services or transition services.

- I. Documentation of completion of appropriate **pre-employment transition services** for a student with a disability.
 - A. Provided by the VRBS program to the student within 45 days of the completion of the required activity or service;
 - B. Documentation will contain, at a minimum, the following information:
 1. Youth's name;
 2. Description of the service or activity completed;
 3. Name of the individual or the provider of the required service or activity;
 4. Date required service or activity completed;
 5. Signature of the designated State unit personnel documenting completion of the required services or activity;
 6. Date of signature;
 7. Signature of designated State unit personnel transmitting documentation to the youth with a disability; and
 8. Date and method (*e.g.*, hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to the youth.
 - C. Once the VRBS program has provided the youth with the documentation needed, the VRBS program will provide a coversheet that itemizes and describes each of the documents provided to the youth.

Importance and consequence as it relates to Section 511: Documentation of the completion of appropriate pre-employment transition services is one of the requirements that a youth must meet if he/she wishes to work in a subminimum wage job. Please note that the individual would have to have received pre-employment transition services while they fulfilled the definition of a student with a disability. If the youth does not have verification of the completion of appropriate pre-employment transition services, then the youth can fulfill the requirements by having documentation of the completion of appropriate transition services. **The youth must have documentation of either transition or pre-employment transition services to enter into subminimum wage employment. Without this documentation, the youth cannot work in subminimum wage employment.**

- II. Documentation of completion of appropriate **transition** services for a youth with a disability under IDEA.
 - A. Provided by the educational agency to the VRBS program within 30 days of completion of the activities.
 - B. The VRBS program provides this documentation to the youth.
 - C. Can be an IEP, but whatever form the documentation takes, it must contain the following at a minimum:
 1. Youth's name;
 2. Description of the service or activity completed;

3. Name of the provider of the required service or activity;
 4. Date required service or activity completed;
 5. Signature of educational personnel documenting completion of the required service or activity;
 6. Date of signature documenting completion of the required service or activity;
 7. Signature of educational personnel transmitting documentation to the designated State unit; and
 8. Date and method (*e.g.*, hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to the designated State unit.
- D. When the educational agency transmits the last documentation of transition services to the VR program, they must provide a cover sheet that itemizes the documentation that has been provided to the VR program regarding that youth.
- E. The educational agency must keep a copy of all documents sent to the VR program.
- F. The VR program has to keep a copy of all of the documentation it provides to the youth.

Importance and consequence as it relates to Section 511: Documentation of the completion of appropriate transition services is one of the requirements that a youth must meet if he/she wishes to work in a subminimum wage job. If the youth does not have verification of the completion of appropriate transition services from the educational agency, then the youth can fulfill the requirements by having documentation of the completion of appropriate pre-employment transition services. **The youth must have documentation of either transition or pre-employment transition services to enter into subminimum wage employment. Without this documentation, the youth cannot work in subminimum wage employment.**

III. **Refusal** of transition or pre-employment transition services:

- A. If a youth with a disability, or as applicable, the youth's parent or guardian refuses, through informed choice, to participate or receive transition services or pre-employment transition services, the documentation of the refusal must contain, at a minimum, the following:
1. Youth's name;
 2. Description of the refusal and the reason for such refusal;
 3. Signature of the youth or, as applicable, the youth's parent or guardian;
 4. Signature of the designated State unit or educational personnel documenting the youth's refusal;
 5. Date of signatures; and
 6. Date and method (*e.g.*, hand-delivered, faxed, mailed, emailed, etc.) by which documentation was transmitted to the youth.
- B. If a youth refuses to receive transition services, the educational agency must provide documentation of the refusal to the VR program within 5 days of the refusal.
- C. Documentation of the refusal of transition or pre-employment transition services must be provided by the VR program to the youth within 10 calendar days of the youth's refusal to participate.

Importance or consequence as it relates to Section 511: If a youth refuses to receive transition or pre-employment transition services, then the youth would **not be able** to work in subminimum wage employment until after they turned 25, and then only if they agreed to receive career counseling and information and referral services.

Step 2: The youth must apply for VRBS services and be either found ineligible, or if determined eligible, have a closed case after having an approved IPE and working towards the vocational goal with appropriate supports and services without success for a reasonable period of time.

IV. Ineligibility Determination

- A. An individual can be found ineligible for rehabilitation services if there is clear and convincing evidence obtained from trial work experiences (TWE) of a sufficient variety over a sufficient period of time that the individual's disability is so significant that the individual is unable to benefit in terms of an employment outcome.
1. TWEs must be provided in the context of a written plan to periodically assess the individual's abilities, capabilities and capacity to perform in integrated work situations;
 2. TWEs include, as needed, supported employment, on-the-job training and other experiences using realistic work settings;
 3. There must be clear and convincing evidence that the individual cannot benefit in terms of an employment outcome; and
 4. The VR program must provide appropriate supports during the TWEs such as assistive technology devices and services and personal assistance services to accommodate the needs of the individual.

V. Closure after an approved Individualized Plan for Employment

- A. If a youth with a disability is unable to achieve the employment outcome specified in the IPE, despite working toward the employment outcome with reasonable accommodations and appropriate supports and services, including supported and customized employment services for a reasonable period of time, the case can be closed as long as it meets all of the requirements of 34 CFR 361.47.
- B. The IPE must have included a specific employment goal consistent with competitive integrated employment, including supported or customized employment.
- C. A reasonable period of time must be consistent with the disability-related and vocational needs of the individual, as well as the anticipated length of the time required to complete the services identified in the IPE.
- D. If the employment outcome is supported employment, a reasonable period of time is 24 months unless the individual and the counselor agree to extend the time to achieve the employment outcome identified in the IPE.

VI. Refusal to pursue competitive integrated employment after an IPE

- A. If a youth with a disability refuses to pursue competitive integrated employment after having an approved IPE developed, then the youth can be found ineligible for services, the case can be closed and the youth can enter subminimum wage employment after completing the other requirements.

Importance and consequence as it relates to Section 511: A youth with a disability must be found either ineligible for services after application, or be closed from plan status according to the requirements noted above in order to work in subminimum wage employment.

Step 3: The youth with a disability must be provided with career counseling, and information and referral services.

Note: Steps 3 and 4 apply to all individuals seeking or currently working in subminimum wage employment regardless of age. The information is included here to identify all of the steps needed for youth seeking subminimum wage employment and will be repeated in the section applying to all regardless of age.

VII. Provision of career counseling, and information and referral services (CC&I&R)

- A. Before a youth with a disability can enter into subminimum wage employment, the youth must have received career counseling, and information and referral to Federal and State programs and other resources in the individual's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience and attain competitive integrated employment;
- B. The CC&I&R must be provided in a manner that facilitates informed choice and decision-making by the youth;
- C. The information and referral services must not be for subminimum wage employment by a 14(c) entity and the employment-related services are not compensated at subminimum wage and do not result in work at a subminimum wage;
- D. CC&I&R cannot be provided by a 14(c) entity;
- E. CC&I&R must be provided to the youth known to be seeking subminimum wage employment within 30 days of a determination of ineligibility or closure from plan;
- F. CC&I&R must be provided to a youth once every six months during the first year of employment at subminimum wage and annually thereafter for the life of the subminimum wage employment;
- G. CC&I&R can be provided directly by the VRBS program or other service provider as long as the provider does not hold a 14(c) certificate;
- H. CC&I&R can be provided individually or in a group setting and can be provided at the work site.

VIII. Documentation of career counseling and information and referral services

- A. Provided by the VRBS program or service provider (not a 14c certificate holder) to the youth as soon as possible upon completion, but no later than 45 days after completion of the activities.
- B. The documentation must include, at a minimum, the following:
 - 1. Name of the individual;
 - 2. Description of the service or activity completed;
 - 3. Name of the provider of the required service or activity;
 - 4. Date required service or activity completed;
 - 5. Signature of individual documenting completion of the required services or activity;
 - 6. Date of signature;
 - 7. Signature of designated State unit personnel transmitting documentation to the individual with a disability; and
- 8. Date and method (*e.g.*, hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to the individual.

Importance or consequence as it relates to Section 511: All youth **must** receive CC&I&R in order to either enter into or continue working in subminimum wage employment.

IX. Refusal of CC&I&R

- A. If a youth, or as appropriate, a youth's representative, refuses to participate in CC&I&R, the VR program or the provider must document this refusal. The documentation must contain, at a minimum, the following information:
 - 1. Name of the individual;
 - 2. Description of the of the refusal and the reason for such refusal;
 - 3. Signature of the VR program personnel documenting the individual's refusal;
 - 4. Date of signatures; and
 - 5. Date and method (*e.g.*, hand-delivered, faxed, mailed, emailed, etc.) by which document was transmitted to the individual.
- B. Documentation of refusal has to be provided to the youth within 10 days of the refusal.

Importance and consequence as it relates to Section 511: If an individual refuses CC&I&R, they cannot enter, or they can no longer work, in a subminimum wage job.

Step 4: The youth must be informed of self-advocacy, self-determination and peer mentoring training opportunities available in the youth's geographic area.

X. Provision of information on self-advocacy, self-determination and peer mentoring training opportunities available in a youth's geographic area

- A. It is the responsibility of the 14(c) holder to arrange for the provision of this information to the youth seeking to enter subminimum wage, and the 14(c) holder cannot provide the information themselves. If the 14(c) employer has less than 15 employees, then the responsibility can be fulfilled by referral to the VRBS program.

- B. The VRBS program can provide this directly or arrange for it to be provided.
- C. The information can be provided by a Center for Independent Living or similar program that has information about or provides the services.
- D. The information must be provided to the youth within 30 calendar days of being known to the VRBS program that the youth is seeking to enter subminimum wage employment.
- E. The information must be provided to the youth every six months for the first year of employment and annually thereafter for the life of the subminimum wage employment.

Importance or consequence as it relates to Section 511: All youth **must receive** information on self-advocacy, self-determination and peer mentoring training opportunities in their geographic area at the prescribed intervals. Documentation of this must be given to the individual working at sub-minimum wage.

Please refer to the following resources in the Forms Appendix:

FAQ regarding the procedures and documentation for youth to enter subminimum wage

Procedures for the Contracting of Pre-ETS

With the passage of WIOA, VRBS is now required to set aside 15 percent of their federal funds for the provision of Pre-Employment Transition Services for students with disabilities. Developing Pre-Employment Transition Services Contracts is one of the strategies that Montana Vocational Rehabilitation and Blind Services (VRBS) is utilizing in order to accomplish this.

The Chief of Field Services, Division Administrator, Youth Services Specialist and Financial Manager will confer on a regular basis to determine the available budget allocation for all Pre-ETS services and the available budget for contracted Pre-Employment Transition Services each year. A spending plan shall be established for all Pre-ETS services inclusive of contracted services by these VRBS management staff members.

The contracts are described below:

School Pre-ETS Contracts

Funds are made available to school districts to build and enhance transition services by providing Pre-ETS in their schools. The Pre-ETS funds are used to pay schools for Pre-ETS they provide based on a fee schedule which outlines payment amounts based on number of students served. The fee schedule rates were developed based on a comparative analysis of similar programs in the region. The rates are routinely reviewed and adjusted as needed based on budget constraints.

Process: Superintendents from all high schools in Montana are sent information about Pre-Employment Transition Services and the opportunity to develop a contract to provide Pre-ETS. Schools are asked to provide a Work Plan and Budget Proposal along with a completed and signed contract. They often contact the VRBS Liaison or Youth Services Specialist for recommendations and information. The schools are provided with resources to help them develop a plan that will supplement the transition services they are providing and not supplant them. Memos from the Office of Public Instruction regarding accounting guidance for Pre-ETS funds, maintenance of effort, and requirement to use Pre-ETS funds to supplement not supplant IDEA services are shared with school personnel. (Copies of the memos are included in Section 3.)

The submitted Contract, Work Plan and Budget Proposal are reviewed by the Youth Services Committee to ensure that the school will only be providing allowable Pre-ETS activities. The Youth Services Specialist follows up with each school to request that they make changes as needed to ensure that the Pre-ETS Funds are spent appropriately on only students with disabilities. Once the contract materials are approved by the Committee, the packet of contract materials is sent to the Chief of Field Services who also reviews it prior to signing off.

Part of the review process is doing an informal risk assessment based on contractor experience, contract dollar amount, complexity and professional judgement. Based on the risk assessment, the Pre-ETS contract will be monitored through desk review of invoices prior to payment and regular contact or on-site visits from the VRBS Liaison Counselor. The School's contract materials are shared with the Field Office staff, so they are fully aware of the School's planned Pre-ETS activities. If the risk is high or concerns arise about the provision of Pre-ETS under the contract, a more intensive on-site monitoring visit by VRBS Management will be scheduled.

The High School Pre-ETS Contracts require that Student Request forms be completed and signed by the student and/or their parents. The forms are reviewed and approved by VRBS prior to the High School requesting funds for those students on the Billing Invoice and Quarterly Report. This ensures that the Pre-ETS reserve funds are only used for appropriate Pre-ETS that participating students with disabilities want and need.

The School District will complete the Billing Invoice and Quarterly Report for approved students within 30 days of the end of the quarter. The Counselor Supervisor will review the submitted materials for accuracy while consulting with the Liaison Counselor as needed. The amounts are verified through a review of the Contract fee schedule. If the Billing Invoice and Quarterly Report are accurate, they are approved and then submitted to the Financial Manager for payment. The original Invoice and Quarterly report are filed in the Contract case file. Copies of these documents are then sent to the Pre-ETS Technician. The Technician will count the total number of Pre-ETS that are being billed for on the Billing Invoice and will calculate the amount for each individual Pre-Employment Transition Service by taking the total amount paid divided by the total number of services, rounding to the nearest whole dollar amount. This amount will be keyed into the Pre-ETS Spreadsheet for each student's Pre-Employment Transition Service received.

Please refer to the following resources in the Forms Appendix:

OPI Memo on MOE

Pre-ETS Contract Work Plan

Pre-ETS School Fee Schedule (Attachment F)

Pre-ETS Invoice (Attachment I)

Pre-ETS OPI Accounting Guidance

Pre-ETS Quarterly Report (Attachment K)

VRBS Parent Letter for Student Request Form

Special Project Pre-ETS Contracts

Funding is made available for programs that assist Montana students by preparing them for college, life and careers. These programs are operated through Independent Living Centers and Universities that don't require a competitive bidding process. These Special Project contracts include the Montana Youth Leadership Forum, Montana Youth Transitions, Movin' On at Montana State University (MSU) and Movin' On at the University of Montana (U of M). The Pre-ETS funds are used to pay the programs for serving specific numbers of students and achieving milestones outlined in the contract scope of service. The rates were determined by reviewing costs of similar programs in the region and taking into consideration the costs associated with providing the Pre-ETS. The rates are routinely reviewed to ensure that they are usual and customary.

Process: The Universities and Independent Living Programs are asked to provide a scope of work proposal which provides detailed information about the Pre-ETS to be provided and cost of the program along with the number of students to be served each quarter. The scope of work will identify the purpose, goals and benchmark performance outcomes which are measurable performance standards. Prior to approval, the proposal and program goals are reviewed by VRBS Management staff to ensure that the program is cost effective in providing needed Pre-Employment Transition Services.

Part of the review process is doing an informal risk assessment based on contractor experience, contract dollar amount, complexity and professional judgement. Based on the risk assessment, the Pre-ETS contract will be monitored through desk review of invoices prior to payment and regular contact or on-site visits from a VRBS Counselor. If the risk is high or concerns arise about the provision of Pre-ETS under the contract, a more intensive on-site monitoring visit by VRBS Management will be scheduled.

The programs will work with students with disabilities to have Student Request Forms completed and to provide the necessary documentation. The forms are reviewed and approved by VRBS prior to the program providing the requested services.

The Billing Invoice and Quarterly Report are submitted within 30 days of the end of the quarter. The Youth Services Specialist reviews the specific requirements of the contract each quarter to ensure that all contract expectations were met. If performance requirements are not met, the payment amount is reduced as outlined in the Special Projects Contract.

If the Billing Invoice and Quarterly Report are accurate, they are approved and then submitted to the Financial Manager for payment. The original Invoice and Quarterly report are filed in the Contract case file. Copies of these documents are then sent to the Pre-ETS Technician. The Technician will count the total number of Pre-ETS that are being billed for on the Billing Invoice and will calculate the amount for each individual Pre-Employment Transition Service by taking the total amount paid divided by the total number of services, rounding to the nearest whole dollar amount. This amount will be keyed into the Pre-ETS Spreadsheet for each student's Pre-Employment Transition Service received.

Please refer to the following resources in the Forms Appendix:

Pre-ETS Invoice (Attachment I)

Pre-ETS Quarterly Report (Attachment K)

VRBS Parent Letter for Student Request Form (MYLF and MYT)

Counselor Purchased Pre-ETS Provider Contracts

Pre-ETS Contracts are developed with Community Rehabilitation Programs, Independent Living Programs and independent vendors to provide Pre-ETS to individuals or groups of students. The Pre-Employment Transition Services are funded through an hourly fee for service based on the type of service provided. The rate for group services is less than the individualized services and requires at least a 1:6 instructor/student ratio. The fee for service rates were determined by exploring the rates of comparable services in the Montana Medicaid-Waiver program.

Process: Current Community Rehabilitation Programs, Independent Living Centers and other local vendors are invited to develop Pre-ETS Contracts with VRBS. The goal is to be able to purchase services for students with disabilities throughout the state. The providers are asked to complete a contract along with a detailed proposal of the Pre-ETS they are offering.

Staff who are providing Pre-Employment Transition Services through the Provider Contract must meet the following qualifications:

- High school diploma, General Educational Development (GED) certificate or High School Equivalency Test (HiSET) and at least one of the following:
- Two years of experience working with students with disabilities
- 30 semester hours of college credit with a minimum of 15 semester hours in special education, specific disabilities, social work, counseling, business or a related field

If Pre-Employment Transition Services are delivered in a group setting, the ratio of students to staff must not be greater than six students to one staff member. All materials for the student to participate in the program must be included in the fee for service.

The proposal is reviewed by the Counselor Supervisor with follow-up from the Youth Services Specialist for any aspects of the Contract that need to be changed. The providers have regular training and informational meetings with VRBS.

The VRBS Counselors refer students with disabilities who are interested in receiving the Pre-ETS. The VRBS Counselor stays in close contact with the student to ensure that they are receiving high quality Pre-ETS through the contract. The Counselor also ensures that any purchased Pre-ETS will not duplicate services received through other contracts, Counselor provided Pre-ETS or comparable benefits.

The VRBS Counselor will complete a Purchase Review Request form for any Pre-ETS over \$500. An Authorization form for the Pre-ETS will be completed through the PERQS process as outlined in the Authorization and Pre-ETS Data section of this guide. Progress reports are required to be completed by the Contractor on a monthly basis and submitted to VRBS with the billing invoice. The report should include a detailed accounting of the Pre-Employment Transition Services provided. The bill and report will be carefully reviewed by the VRBS Counselor for accuracy and to ensure that the Pre-ETS Reserve funds are only used for Pre-ETS as outlined in the Billable Pre-ETS Activities Reference Guide. Approved payments will be made through the PERQS system.

Please refer to the following resources in the Forms Appendix:

Billable Pre-ETS Activities Reference Guide

Provider Fee Schedule



Section 2

Pre-Employment Transition Services Authorizations and Data Tracking Guide

Step by Step Instructions for
Pre-ETS Purchases through PERQS

Counselor:

Determine that the student is still eligible for Pre-ETS:

- Is in a secondary, postsecondary or other recognized education program and
- Is not younger than 14 years of age
- Is not older than 21 years of age
- Is eligible for and receiving special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.); or is an individual with a disability

When the initial purchase is needed to be made through the PERQS system, the Student will be assigned a Unique Identifier number, this number will stay with the student through the life of their Pre-ETS case. The unique number identifier is nine characters that is a combination of the city the VR office is in followed by the counselor's number followed by a four-digit sequential number assigned by the counselor.

a) The three characters for the city are:

- | | | |
|-------|-----|-------------|
| i. | BLG | Billings |
| ii. | BOZ | Bozeman |
| iii. | BUT | Butte |
| iv. | GFL | Great Falls |
| v. | HAV | Havre |
| vi. | HEL | Helena |
| vii. | HML | Hamilton |
| viii. | KAP | Kalispell |
| ix. | MLC | Miles City |
| x. | MSL | Missoula |

b) The next two digits are the counselors' number and the last four are a sequential number assigned by the counselor starting at 0001 and going through 9999.

c) Do not use spaces or dashes

d) **This number will stay with the client through their Pre-ETS case life even if they move to a different region/office.**

All purchases of goods and services on behalf of a VRBS customer must be pre-approved using a purchase order. A purchase order is a contract between VRBS and a registered vendor or VRBS customer. The vendor must be registered in AWACS before any purchase order can be created. Approval must be received through the “Green Light” process for a purchase that meets any of these criteria: 1) a purchase of \$500 or more, 2) purchase of a service that will last more than one month or 3) requires an IPE Amendment.

The counselor completes the Purchase Review form with the case #, disability information, purchase description, provider name, worksite identified, cost, work goal, date needed by, whether it is an IPE Amendment and other relevant notes. The supervisor receives the form and reviews the case in MACS if applicable. The supervisor forwards the Purchase Review form to a peer supervisor from another office for further review. Purchases over \$3000 are sent to Central Office for management review. When the purchase is approved by the peer supervisor or manager, the “green light” is sent to the counselor who is able to authorize services using the Pre-Employment Transition Services Authorization Form

- a) The counselor will ensure that the correct Unique Identifier number to match the client is provided on the form. They will also ensure that the service is an approved Pre-ETS service, and the correct number of hours and monetary rate for each service are utilized. For dates the counselor will set up services per quarter. Example: Monitor Work Based Learning Jan-March. This will be on one line of Authorization form.
- b) Drop down menus are available for the Service Category for the five PRE-ETS service types (which identify the speed chart) and the Provider Type. Each service type has a specific speed chart for that service. It is imperative that the correct speed chart be used for the service category. The “X” is the federal fiscal year the services are provided in (e.g. KE019 would be associated with services provided in federal fiscal year 2019 whose dates are October 1, 2018 through September 30, 2019); this digit changes with the federal fiscal year.

- i. KE01X Pre-ETS CRP Job Exploration
- ii. KE02X Pre-ETS CRP Work Based Learning
- iii. KE03X Pre-ETS CRP Counseling on Post-Secondary Programs
- iv. KE04X Pre-ETS CRP Workplace Readiness
- v. KE05X Pre-ETS CRP Self Advocacy
- vi. KJ11X BL Direct Counselor Services
- vii. KL20X RS Direct Counselor Services
- viii. KM0X9 Pre-ETS School Contracts
- ix. KMMLX Pre-ETS MYLF
- x. KMMOX Pre-ETS MovinOn
- xi. KMMTX Pre-ETS MYTransitions

**Pre-Employment Transition Services
Authorization Form**

Identification Number: Purchase Order:

Client Name: _____

Provider: _____

Address: _____

Description of Services Authorized: _____

Once Counselor has verified that all information is correct they will sign the form. Counselor or their support staff will send the completed form to the Youth Services Specialist (through EPASS, FAX or Scan and Email) for the Counselor Supervisor Approval process.

Please refer to the following resources in the Forms Appendix:

Pre-ETS Authorization Form

Youth Services Specialist:

The Youth Services Specialist (YSS) will receive the Pre-Employment Transition Services Authorization Form from the Counselor for approval.

a) The YSS will examine the information provided on the Authorization form for accuracy. The YSS will make certain that the services requested are actual Pre- ETS allowed services, the dates are correct and do not cross over quarters and that the form is complete with the required information. The YSS will randomly audit if the client is eligible for Pre-ETS services.

b) If approved she will sign the Authorization form indicating it is correct and will give the paper form to the Pre-ETS Technician for the creation of a requisition number and Purchase Order in PERQS.

c) If missing information or data is incorrect, the YSS will contact the initiating Counselor to make the necessary corrections and the Authorization form will be resubmitted to the YSS to continue processing.

aps00110 .42 **Purchasing Entry, Receiving and Query System (PERQS)** 02/22/2019
 CS0030 **Standard Purchase Order Entry/Update** 01:38 PM

PO # Entered Status No status yet   

Req # Approved Total \$\$ 

Purchase Order Header Ordered Items PO Comments PO Action History

Purchase Order Vendor Items Shipped To  Bill Items To 

Once the requisition number is created in PERQS, the Authorization will be electronically submitted to the YSS for electronic approval in PERQS. Once the electronic approval is complete the Pre-ETS Technician will then be able to finalize the services and create the Purchase order number. (Purchases over \$500 will automatically be assigned to the Branch Manager for a secondary approval).

Pre-ETS Technician:

The Pre-ETS Technician will receive the paper Pre-Employment Transition Services Authorization form from the YSS to begin the process through the PERQS System.

- a) The Technician will verify the Unique Identifier number matches the client needing services.
- b) The Technician will also ensure the information matches correct Pre-ETS procedures; the dates fall in one quarter, the services provided are authorized Pre-ETS services, the correct speed chart number has been used etc.
- c) If all information is correct, the Pre-ETS Technician will set up the purchase order in PERQS.
- d) If any of the information is incorrect, the Technician will confer with the YSS if necessary and contact the initiating Counselor to have information corrected prior to creating the Requisition number in PERQS.

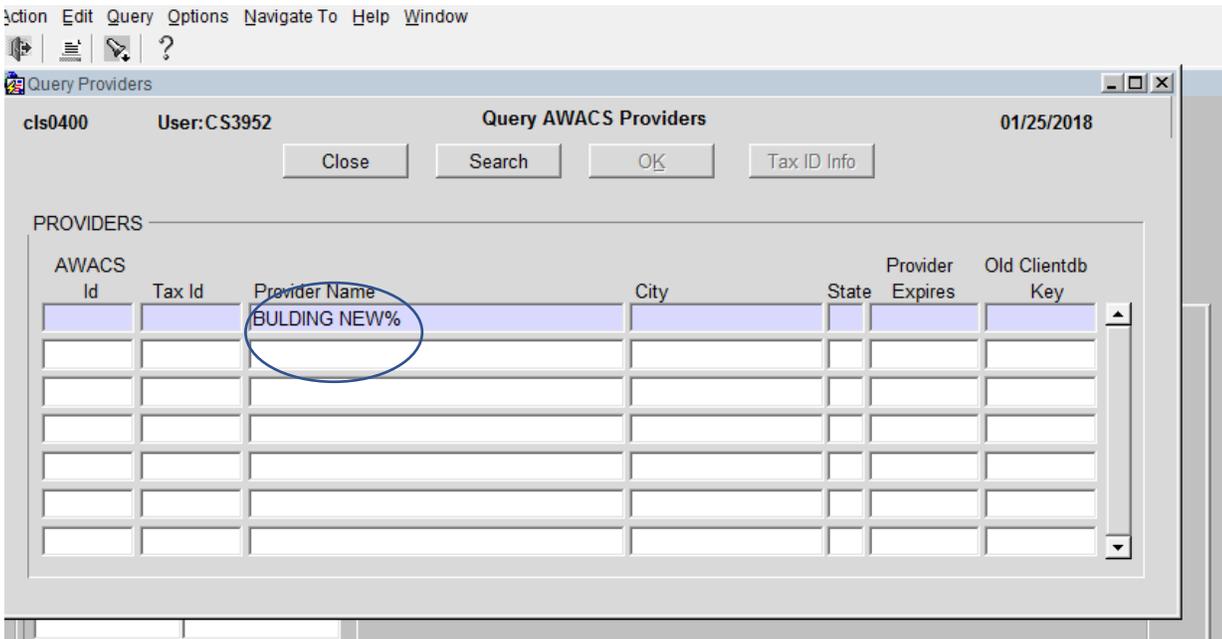
PERQS Process:

1. When in PERQS choose Standard PO



3. Search for the appropriate provider using either the AWACS ID, Tax ID or in the Provider Name Box:

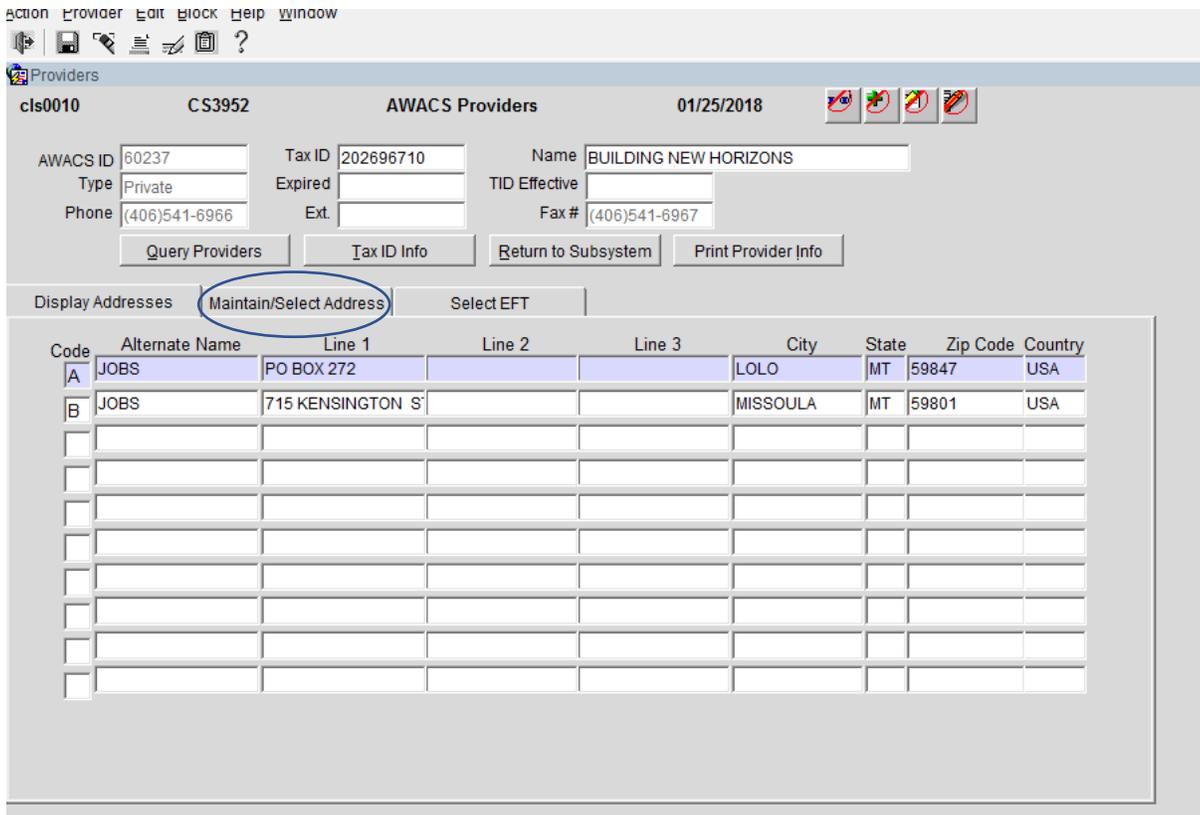
When searching in the Provider Name field make sure to use the % sign at the beginning and the end of the name to search for the provider.



4. Click F8 to search

5. Double click on the correct provider from the list of providers.

Your screen should now look like this:



Make sure that the vendor you select is purple

6. Select the Maintain/Select Address tab

7. If the address is correct, Click Select Address then click Return to Subsystem

Department of Public Health and Human Services - AWACS

Action Provider Edit Block Help Window

Providers

cls0010 CS3952 AWACS Providers 01/25/2018

AWACS ID: 60237 Tax ID: 202696710 Name: BUILDING NEW HORIZONS
Type: Private Expired: TID Effective:
Phone: (406)541-6966 Ext: Fax #: (406)541-6967

Query Providers Tax ID Info **Return to Subsystem** Print Provider Info

Display Addresses Maintain/Select Address Select EFT

Select Address Save Changes Previous Address
Next Address
Add Address

Address Code: A Alternate Name: JOBS
Street Address: PO BOX 272
City/State/Zip: LOLO MT 59847 Country: USA
Phone: ##### Ext: Ownership:
Address Expires: Owned By:
Email: jobsinfomt@gmail.com Fax to:
Address Comments:
Created: 07/19/2005 By: Susan D Austad Phone: None
Modified: 10/23/2013 By: Monique R England Phone: (406) 444-2797

Click CLOSE on the pop up

Click OK on the next pop up

Your screen should now look like this with the vendor information populated on left; if provider is not the correct one, you can re-start the search by double clicking in the first box under Purchase Order Vendor field again.

aps00110 USER: CS3952 DATE: 01/25/2018 DATABASE: HSPRD1

aps00110 .42 Purchasing Entry, Receiving and Query System (PERQS) 01/25/2018
CS3952 Standard Purchase Order Entry/Update 01:38 PM

PO # Entered Status No status yet
Req # Approved Total \$\$

Purchase Order Header Ordered Items PO Comments PO Action History

Purchase Order Vendor
60237 202696710 A
BUILDING NEW HORIZONS
JOBS
PO BOX 272
LOLO MT 59847
14989
jobsinfomt@gmail.
 Non-Mailer (checked is Yes)

Items Shipped To
Bill Items To

Order Date Sole Source

Misc Systems
PG Job #
Awacs Contract
IFB/RFP

Other Contracts
Proxy PO By
Term Contract
Vendor Quote

SABHRS PO
Req #
IFB/RFP
PO #

8. Complete the Purchase Order Header tab with the Shipped to and Bill to information (these two should be the regional office to which the client is assigned to). If the vendor is not a current vendor, the local office support staff will need to obtain a W9 from the vendor and request they be created as a vendor through the Fiscal Services Bureau of BFSB, this will need to be completed prior to a purchase order being done.

9. Type in the PO Comments field this Approval statement: **"Counselor purchased Pre-ETS benefits for VRBS clients already approved by Branch Manager; this PO will remain open until all invoice lines have received invoices and been paid."**

Version Help Print Screen Exit Window
 APS00110 USER: CS5125 DATE: 05/16/2017 DATABASE: HSPRD1
 aps00110 .41 Purchasing Entry, Receiving and Query System (PERQS) 05/16/2017
 CS5125 Standard Purchase Order Entry/Update 03:19 PM

PO # Entered Status No status yet
 Req # Approved Total \$\$

Purchase Order Header | Ordered Items | PO Comments | PO Action History

PO Comments
 Comments To Vendor

10. Complete the Ordered Items tab. If multiple months services are approved enter the months by Quarter, i.e., Jan-March or Feb-March, all on one line. If service is for hours enter the number of hours as the quantity and the hourly rate as the unit price.

11. The account will always be 67103. Be sure to select the correct speed chart for the service description and fiscal year.

aps00110 .42 Purchasing Entry, Receiving and Query System (PERQS) 02/26/2019
 CS0030 Standard Purchase Order Entry/Update 12:57 PM

PO # Entered CS0030 02/26/2019 13:23 Status Pending Supervisor Approval
 Req # 236121 Approved Total \$\$ \$200.00 PO HAS COMMENTS

Purchase Order Header | Ordered Items | PO Comments | PO Action History

Ln	Qty	UM	Unit Price	Total \$\$	Created	Created By	Modified	Modified By
1	5	HRS	\$40.00	\$200.00	02/26/2019 13:23	CS0030		
GFL090022 PRE ETS WORK BASED LEARNING TO SET UP								
Ln	Qty	UM	Unit Price	Total \$\$	Created	Created By	Modified	Modified By
Ln	Qty	UM	Unit Price	Total \$\$	Created	Created By	Modified	Modified By
Ln	Qty	UM	Unit Price	Total \$\$	Created	Created By	Modified	Modified By

Speedchart	Account	Amount	Accr	Fund	OpenItem	Created	Created By
KE029	67103	\$200.00	N			02/26/2019 13:23	CS0030

Services Authorization Form followed by the service description and the dates approved for this service

13. Select the save (yellow disc) option to save your submission information.

14. When first saved in PERQS, this process will create a requisition number, be sure to write this number at the top of the Pre-Employment Transition Services Authorization form.

The screenshot shows the 'Standard Purchase Order Entry/Update' form in the PERQS system. At the top, there is a header with 'Version Help Print Screen Exit Window', 'APS00110 USER: CS5125 DATE: 05/16/2017 DATABASE: HSPRD1', and 'aps00110 .41 Purchasing Entry, Receiving and Query System (PERQS) 05/16/2017 CS5125 Standard Purchase Order Entry/Update 03:19 PM'. Below the header are input fields for 'PO #', 'Entered', 'Status' (set to 'No status yet'), 'Req #', 'Approved', and 'Total \$\$'. There are icons for saving (yellow disc), deleting (red X), and printing. Below these are tabs for 'Purchase Order Header', 'Ordered Items', 'PO Comments', and 'PO Action History'. The main form area has three columns: 'Purchase Order Vendor', 'Items Shipped To', and 'Bill Items To'. The 'Order Date' field in the 'Items Shipped To' column is circled in blue. There is also a 'Sole Source' checkbox. At the bottom, there are sections for 'Misc Systems' (PG Job #, Awacs Contract, IFB/RFP), 'Other Contracts' (Proxy PO By, Term Contract, Vendor Quote), and 'SABHRS PO' (Req #, IFB/RFP, PO #).

15. The Pre-ETS Technician will then select the “email” to submit the form electronically to the Youth Services Specialist for approval.

16. Once approved by the YSS, the Pre-ETS Technician will enter the date in the Order date field in PERQS and double click in this field to turn the requisition into a purchase order. When the purchase order number is assigned by PERQS, this number will be written into the box provided on the form.

17. The Pre-ETS Technician will email the Initiating Counselor and their support staff the assigned purchase order number and that process is complete for this Pre-ETS service. The support staff will make a copy of purchase order to be kept in the Pre-ETS client case file. The Pre-ETS Technician will supply the vendor the purchase order as confirmation of the request and purchase of the services through EPASS, FAX or mail, this allows the Vendor to be able to begin services. A copy will be kept by the Pre-ETS Technician for record keeping.

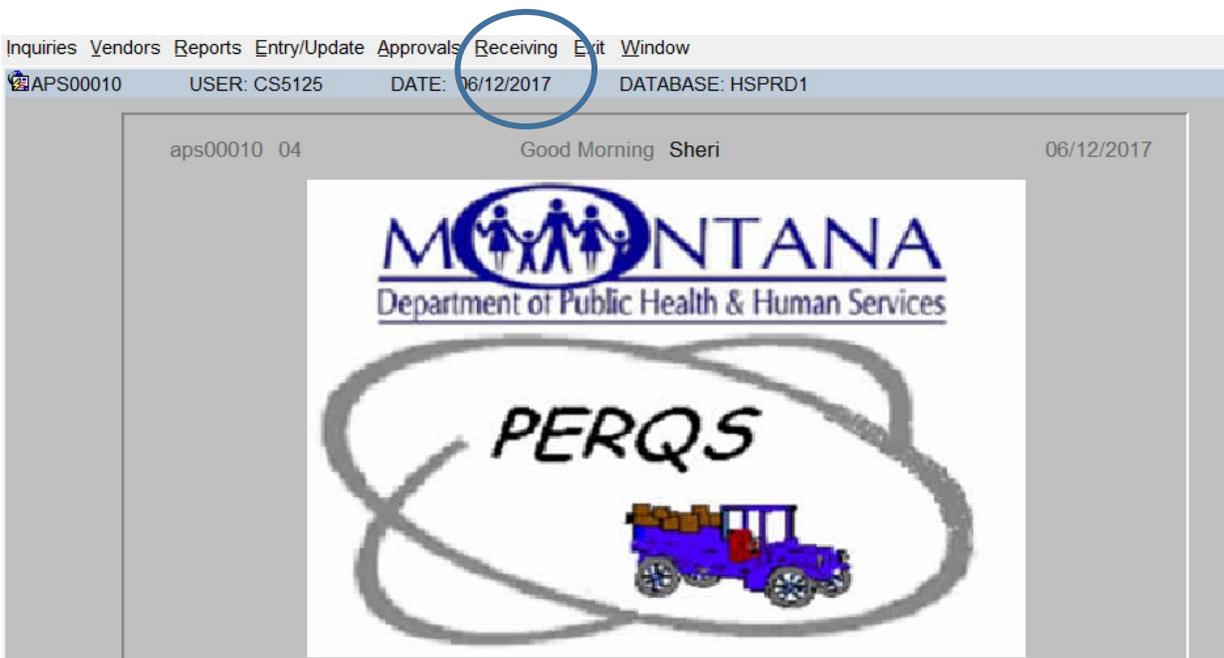
If an error has been identified **prior** to the complete purchase order process, the Pre-ETS Technician will correct the error.

If an error is identified **after** the purchase order has been created the Pre-ETS Technician will be notified. The Technician will contact the Purchasing Agent in Fiscal to make the correction. If the correction can't be made, the purchase order may need to be cancelled and a new one with the correct information would then need to be created and sent out to Vendor.

Invoicing and Reports:

1. When an invoice is received the counselor or support staff will reference the purchase order number on the invoice when submitting the invoice for payment through PERQS. This invoice will go to the counselor to approve billing amount and indicate on purchase order to pay such amount, initial and date. Their support staff will ensure a copy of the bill and original documentation that is submitted with the bill will be filed in Clients 6-sided folder. Original bill/invoice will be sent to Pre-ETS Technician for processing.

2. Pre-ETS Technician will process the invoice against the Purchase Order for payment in PERQS.
 - a. If paying only one line, select that line for payment.
 - i. Choose Receiving from the PERQS menu



- ii. Go to the Receiving Items tab

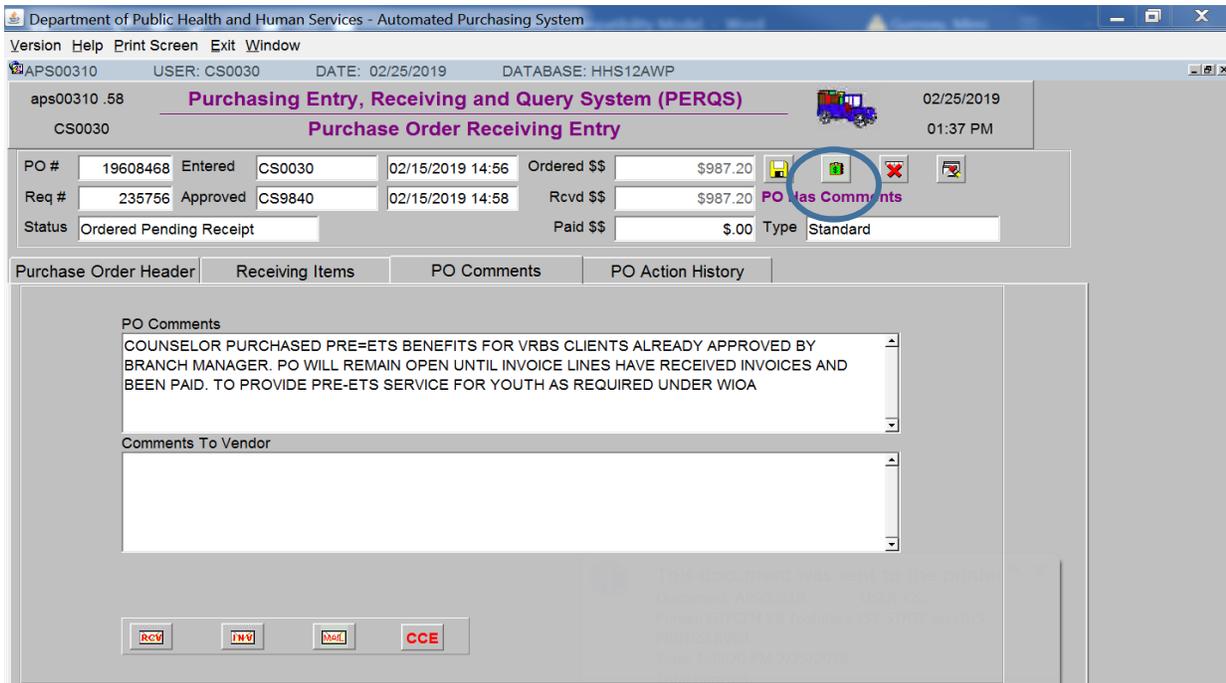
Purchase Order Header		Receiving Items		PO Comments		PO Action History		
Ln	Qty	UM	Adj	Unit Price	Total \$	Ppd Invoice	Invoice Date	Receiver
<input checked="" type="checkbox"/>	1	EA		\$276.96	\$276.96			#69342
<input checked="" type="checkbox"/>	2	1 EA		\$93.91	\$93.91			Black inl
<input checked="" type="checkbox"/>	3	2 EA		\$26.67	\$53.34			Recycle
<input type="checkbox"/>								
<input type="checkbox"/>								

- iii. Check the appropriate line

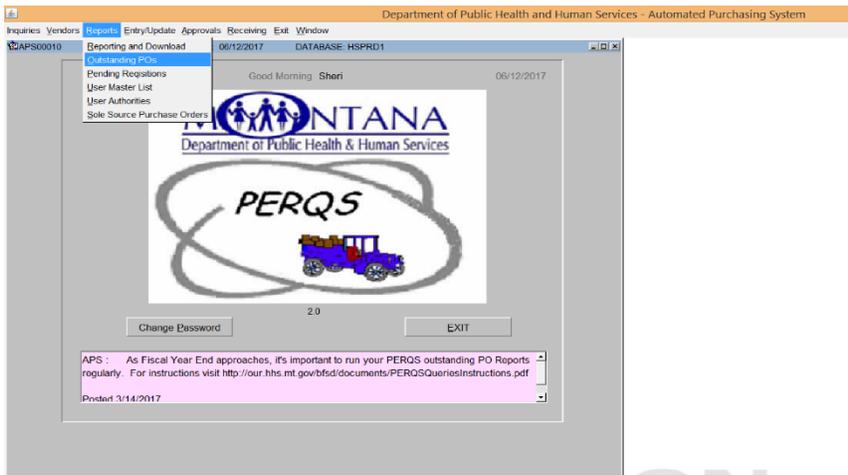
Go the to the PO Comments tab. After approval statement, enter in the information to request payment of the service, in all CAPS.

Example: PAYING \$40 FOR 1 HR IN JAN PER INITIALS/DATE.

When complete payment information is given select the financial button to send to fiscal.



3. The original bill will be sent to Business and Financial Services Division, Fiscal Service Bureau for final processing.
4. Reports can be run on outstanding PO's to see which PO's need attention
 - a. Choose Reports, Outstanding PO's



- b. In the appropriate fields:
 - i. Be sure the Path is "g:\EXCEL\"
 - ii. Enter a file name with no spaces
 - iii. Enter your Speed chart (you can use a % sign if you want all speed charts for your unit i.e. KN14% will give you KN145, KN146, KN147, etc.)

c. Click the Excel logo to create the file

d. Go to Excel and open the file

5. On a monthly basis the Financial Manager will run reports out of the SABHRS financial system on the speed charts for cost by service category and by the unique identifier for student counts for federal reporting and provide the information to the Pre-ETS program manager.

If an error is identified after payment process, the Pre-ETS Technician will be notified. The Technician will contact the Fiscal Purchasing Agent to make the corrections.

The following link will take you to PERQS eLearning training:

<http://ours.hhs.mt.gov/bfsd/documents/eLearning/player.html>

The screenshot displays the Articulate eLearning player interface. At the top left, it shows "eLearning Final (00:05 / 09:25)" and the Articulate logo. On the right, there is an "ATTACHMENTS" link. The main content area is titled "Table of Contents" and features a "Next" button with navigation arrows. On the left side of the main area, there is a vertical list of 14 topics, with "1. Table of Contents" selected. The right side of the main area displays the "PERQS Introduction" section, which includes a list of topics under the heading "In this Section:":

- Introduction
- Office of Procurement and Contracts
- Accounts Payable
- System Access
- System User Roles
- PERQS Website
- Password Reset

At the bottom of the player, there is a control bar showing "SLIDE 1 OF 14", "PLAYING", and a timer "00:05 / 01:05". The Articulate logo and "POWERED PRESENTATION" are also visible in the bottom left corner.

Case Filing Guide

2 Types of Files	Student with a Disability Receiving VR Services <i>and</i> Pre-ETS Services	Student with a Disability Waiting for VR Services Receiving Pre-ETS Services
Side 1		
Side 2	All Counselor Case Notes in chronological order. Pre-ETS case notes have the heading: Pre-ETS	All Counselor Case Notes in chronological order. Pre-ETS case notes have the heading: Pre-ETS
Bottom of Side 3	<p><u>Under a Pre-ETS Divider:</u></p> <p>*Reports from Pre-ETS providers (CRP's, IL's, Colleges, etc.)</p> <p>*Acceptance Letter from College if student has graduated from High School and is enrolled in a Postsecondary Program.</p> <p>*Student Quarterly Pre-ETS Reports for Direct Provision/Comparable Benefits</p> <p>*Student Request Form</p>	<p><u>Under a Pre-ETS Divider:</u></p> <p>*Reports from Pre-ETS providers (CRP's, IL's, Colleges, etc.)</p> <p>*Acceptance Letter from College if student has graduated from High School and is enrolled in a Postsecondary Program.</p> <p>*Student Quarterly Pre-ETS Reports for Direct Provision/Comparable Benefits</p> <p>*Proof of Pre-ETS Services provided prior to VR Eligibility Determination (Black Hole Procedure)</p> <p>*Student Request Form</p>
Side 4		
Side 5		
Bottom of Side 6	<p><u>Under a Pre-ETS Divider:</u></p> <p>*PERQS Authorizations & Paid POs for Pre-ETS</p>	<p><u>Under a Pre-ETS Divider:</u></p> <p>*PERQS Authorizations & Paid POs for Pre-ETS</p>

Quarterly School Contract

The High School Pre-ETS contracts require that School personnel submit a Student Request Form for each student who is interested in receiving Pre-Employment Transition Services under the school contract.

If the Request Form is being completed with the assistance of school personnel, they verify that the individual meets the definition of a student with a disability. If the Request Form is being completed by non-school personnel, one of the required supporting documents must be provided to VRBS with the request form.

VRBS Staff will review the Request Form and any supporting document to confirm that the individual meets the definition of a student with a disability. VRBS Staff will ensure that the student has reviewed information about Pre-Employment Transition Services and requested specific services. VRBS Staff will indicate whether they are in agreement that the requested Pre-Employment Transition Services are appropriate and necessary for the student to prepare for life after high school.

If the VRBS Staff is in agreement, the form will be signed, and a copy sent back to the referral source. If there is any concern regarding the student's Request Form, disability status, parent/guardian consent, social security number, or need for Pre-Employment Transition Services the VRBS Counselor/Counselor Supervisor will contact the referral source for clarification and additional information.

The VRBS Staff will keep the original fully completed Request Forms for each school and will send a copy of the fully completed Request Form to the Pre-ETS Technician. The school will complete a Quarterly Report and Billing invoice within 30 days of the end of each quarter. The Quarterly Report will provide the following information for each student who completed a VRBS approved Request Form: Student's Name, Student's Social Security Number, Disability Status, Ethnicity, Race, and Pre-ETS Service(s) Received. The school will be asked to list and describe the Pre-Employment Transition Services that were provided during the quarter including the specific activities, dates and outcomes.

Please refer to the following resources in the Forms Appendix:

Student Request Form



**Vocational
Rehabilitation & Blind
Services**

Disability Employment & Transitions
Division

ATTACHMENT I - INVOICE

Invoice Service Dates:	
Calendar Year _____	
<input type="checkbox"/> Jan-Mar	<input type="checkbox"/> Apr-Jun
<input type="checkbox"/> Jul-Sept	<input type="checkbox"/> Oct-Dec
Contract #:	Tax ID #:
Contractor Name/School District:	
Contractor/School District Address and County:	

ATTACHMENT K – QUARTERLY REPORT

School District:	Calendar Year:	
School Name:	<input type="checkbox"/> January – March	Due by April 30 th
City, State & Zip:	<input type="checkbox"/> April – June	Due by July 31 st

Student's Name*	Student's School ID Number	Student's Birthdate (YYYYMMDD)	Student's Disability Status	Student's Ethnicity	Student's Race	Pre-ETS Received
			1-Has a 504 plan 2-Has an IEP 3-Has a disability (does not have a 504 plan or IEP)	1--Student is Hispanic or Latino 0--Student is not Hispanic or Latino 9-Ethnicity not identified	AJ-American Indian A-Asian B-Black NH-Native Hawaiian W-White 9-Race not identified	1- Job exploration counseling 2- Work-based learning 3-Counseling on transition or postsecondary education 4-Workplace readiness training 5-Instruction in self-advocacy

VRBS Supervisor:

When the VRBS Supervisor receives the Billing Invoice and Quarterly Report, the Supervisor will review the documents to ensure accuracy. The Supervisor will confer with the VRBS liaison counselor to verify that the activities outlined in the Quarterly Report are occurring as described and fit into the description of Pre-ETS. They will also verify that each student on the Quarterly Report has a fully completed Student Request Form. The Quarterly Report numbers will be checked to ensure that they match the Billing Invoice. The Billing Invoice will include a specific number of students who received Pre-ETS in each school in the district. The listed numbers should match the reimbursement Fee Schedule amounts included in the Pre-ETS Contract for Services.

Once the VRBS Supervisor has verified the accuracy of the Billing Invoice and Quarterly Report, he or she will sign off on the Invoice. The materials will then be sent to the Fiscal Manager for payment using the Pre-ETS reserve funds. The paid Billing Invoice and Quarterly Report will be filed in the School folder each quarter. A copy of the Invoice and Quarterly Report will be sent to the Pre-ETS Technician who will enter the required data into the Pre-ETS Spreadsheet once it has been paid.

Please refer to the following resources in the Forms Appendix:

- Attachment I
- Attachment K
- Pre-ETS Authorization
- Student Quarterly Report

Pre-ETS Technician:

The Pre-ETS Technician will receive the Paid Billing Invoice and Quarterly Report from the Fiscal Manager. The Technician will verify that all students on the quarterly report have fully completed Student Request Forms.

The Technician will count the total number of Pre-ETS services that are being billed on the Billing Invoice and will calculate the amount for each individual Pre-ETS service by taking the total amount paid divided by the total number of services, rounding to the nearest whole dollar amount. This amount will be keyed into the Pre-ETS Spreadsheet for each student's Pre-ETS service received.

Access the appropriate data sheet in *SharePoint*;

Click on **MVR Resource and Tools Library**

Click on **Pre-ETS CONTRACTS** folder (there are 2 file folders with this name, click on both)

Click on **Pre-ETS Data** folder

Click on **Current Quarter**

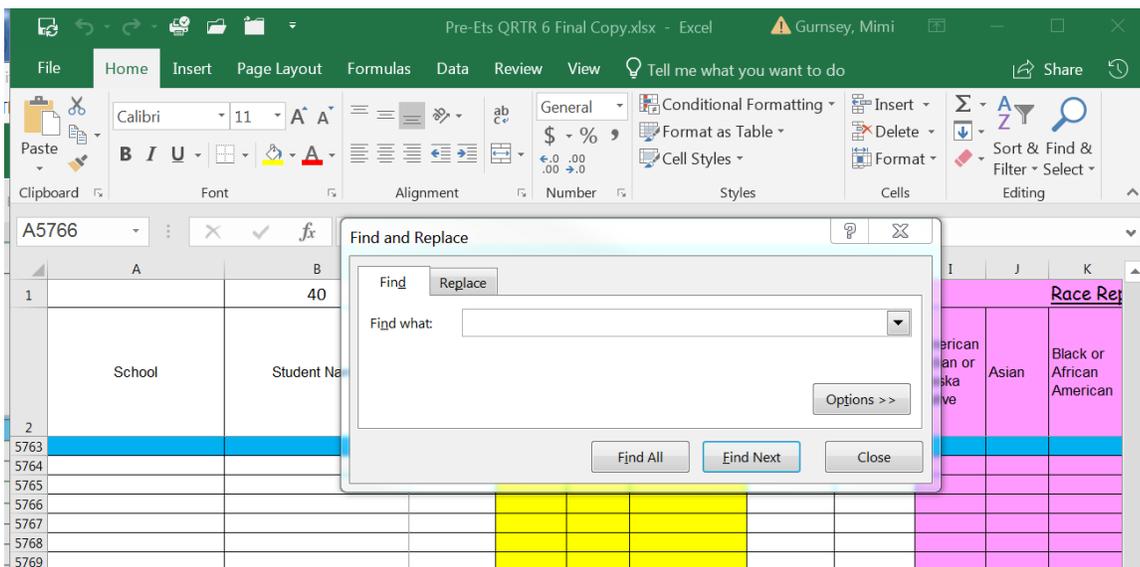
Select the **Edit Workbook** drop down

Choose **Edit** in Excel option

When the Excel sheet opens select **Edit Workbook** at top of screen.

Use Find & Select feature for every client:

1. Type in data (try name in exact format, try Date of birth, try Student Id etc)
2. Select Find All – Always, searching this way ensures that an already reported client will be located and a duplicate line will not be created.



It is very important to use this feature for every client to ensure that they are not already on the sheet. We need to ensure that we are not creating duplicate lines for individuals. Once a Unique Identifier is reported to RSA we can't delete it or reuse it even if it is a duplicate.

ALWAYS MAKE YOUR CHANGES IN RED FONT.

This will allow you to see what lines have been changed and what lines have not been changed.

***No Line found:**

Check by multiple options, try DOB, try Name, Try SSN and try Student Id to ensure the client is not already on the spreadsheet. If the student does not have an existing line, the Pre-ETS Technician will create a new line at bottom of Excel Spreadsheet with "VR Client" in column A (per office example Billings VR or Billings VR WL(student on waitlist) adding all information given including Name, DOB Student ID and SSN# in format that is already on sheet.

The Technician will enter a "1" in Service Provided by VR Agency Staff Purchase, enter a "3" in Purchased Service Provider Type (for school contract) and the dollar amount rounded up or down to nearest dollar amount in the VR Program Expenditure for Purchased Service for each category the school provided per student.

Do not key in the Unique Identifier number columns

***One line found:**

The Technician will update the data. Enter a "1" in Service Provided by VR Agency Staff Purchase, enter a "3" in Purchased Service Provider Type (for school contract) and the dollar amount rounded up or down to nearest dollar amount in the VR Program Expenditure for Purchased Service for each category the school provided per student.

1.If there is data in a category from last quarter and the client is not on the current school Quarterly bill change the number "1" to a "2" in the following columns:

- a) Service Provided by VR Agency Staff (in-house)
- b) Service Provided Through VR Agency Purchase
- c) Service Provided by Comparable Services and Benefits Providers

2. When changing to a "2" you will remove the data in the following columns:

- a) Purchased Service Provider Type
- b) VR Program Expenditure for Purchased Service
- c) Comparable Service and Benefis Provider Type

***More than one line found:**

The Technician will key new QRTR data on **VR client line (once a student is found to be a client in the MACS system, they are listed as VR Client in column 1)** if there is one. If there is no VR client line check each of the lines that are found and update the line that has last qrtr services billed if possible. Any other lines will be treated as duplicates and you will change any “1’s” to “2’s” and remove appropriate other data

DO NOT DELETE A LINE THAT IS ALREADY ON THE SHEET

Once a Unique Identifier number is reported we cannot delete it or change the Basic Client information (Name, DOB, Race, Disability or Pre -ETS Start date) we can only change the services they receive.

Student's Quarterly Report for Pre-Employment Transition Services					
Student's Name	Student's School ID Number	PERQS Unique Identifier	Student's Original Pre-ETS Start Date	High School/ Expected Graduation Year	Other Pre-ETS Programs Studer participated in
Pre-Employment Transition Services			Record 1 if service was provided directly by VRBS staff	Record up to three codes that best describe agencies who provided the student with a comparable service or benefit	
1. Job exploration counseling					

The information provided on the above sheet will be entered into the Pre-ETS Quarterly Excel sheet after all the paid school contracts are keyed by the Pre-ETS Technician.

After using Find/Select the Technician will update the student’s information if they are located on sheet. If the student does not have an existing line, a new line will be created at bottom of Excel Spreadsheet with “VR Client” in column A.

Quarterly PERQ's Payments for Pre-ETS

Service	Identifier	Values			Total
		Sum of October	Sum of November	Sum of December	
Job Exploration	BLG070004		208.00	208.00	416.00
	BLG900003	1,256.00		1,256.00	2,512.00
	BLG900004	112.00		112.00	224.00
	MSL170001		80.00	80.00	160.00
	MSL170002	80.00		80.00	160.00
Work Base Learning	BUT41004	1,673.00			1,673.00
	BLG070004	633.60			633.60
	BLG070007	272.00	112.00	272.00	656.00
	BLG070009	360.32	466.35	32.00	858.67
	BLG120001	64.00	80.00	192.00	336.00
	BLG120002	833.18	664.29	914.95	2,412.42
	BLG120003	112.00		176.00	288.00
	BLG120004	1,807.96	1,157.31	136.00	3,101.27
	BLG120005	784.58	600.88		1,385.46
	BLG120006	64.00	32.00	96.00	192.00
	BLG120007	144.00	80.00	192.00	416.00
	BLG160001		64.00	24.00	88.00
	BLG530001	432.00	400.00		832.00
	BLG860002	392.00	672.00	224.00	1,288.00
	BLG860005			16.00	16.00

The Pre-ETS Technician will identify which client is assigned to the Unique Identifier. Access the current Quarter data sheet in SharePoint to enter the data.

In Excel use the Find/Select Feature:

***No line found:**

If client is still not found the Technician will go to the bottom of the spreadsheet and enter a new line with "Office VR" in column A.

***One line found:**

Update the data.

*If listed under a school name change it to VR (example Billings VR or Missoula VR)

*If there is data already entered in "RED" that means it is updated for current QRTR, do not delete it. Add the information from the PERQ'S payments to appropriate column.

*If there is already data in that column keyed in "RED" from a school contract keep the "1" in the following columns Service Provided by VR Agency Staff (in-house), Service Provided Through VR Agency Purchase and Service Provided by Comparable Services and Benefits Providers AND in the Purchased Service Provider Type use a "2" if the PERQs payment is a higher dollar amount. If there is data in a category from last quarter and there is no data in that category for this quarter change the number "1" to a "2" in the following columns (Capturing data for Data Elements 97-126):

- a. Service Provided by VR Agency Staff (in-house)
- b. Service Provided Through VR Agency Purchase
- c. Service Provided by Comparable Services and Benefits Providers

*When changing to a “2” you will remove the data in the following columns:

- a. Purchased Service Provider Type
- b. VR Program Expenditure for Purchased Service
- c. Comparable Service and Benefits Provider Type

***More than one line found:**

You will key new QRTR data on VR client line if there is one. All other lines will be treated as duplicates and you will change any “1’s” to “2’s” and remove appropriate other data.

Once the data is complete and all contracts, PERQs payments and Counselor Services have been entered, the Pre-ETS Technician will save a Final Copy in SharePoint and notify the IT Business Analyst.

IT Business Analyst:

The IT Business Analyst will verify the information for accuracy by running a series of Data Checkers. If errors are indicated the IT Business Analyst will send this information back to the Pre-ETS Technician to make corrections.

Unique Identifier field: All service record data submitted for the same reporting period must be associated with a unique individual. Therefore, each individual receiving services must be assigned a twelve-digit Unique Identifier (III.A). This identifier allows RSA to report an unduplicated count of individuals receiving services in accordance with the Joint WIOA Performance Information Collection Request (Joint Performance ICR). The unique identifier will also be used to calculate a count of unique program participants for each State, which will be reported on the State Performance Reporting Template. In addition, the unique identifier provides RSA a means to communicate with agencies regarding an individual’s data elements without the exchange of Personally Identifiable Information (PII).

If an individual does not have a Social Security Number (SSN) or chooses not to provide an SSN, only the Unique Identifier is reported. An individual’s SSN is reported only once to RSA with the Unique Identifier. After that, the Unique Identifier is the only unique individual data element reported with each data submission.

The Unique Identifier must be submitted quarterly for all applicants and eligible individuals, as well as students with a disability who are solely receiving pre-employment transition services and who have not yet applied for VR services.

Once either of these data elements have been reported, the data elements may ONLY be changed by contacting RSA Data Unit staff to initiate a modification.

Once all the IT Business Analyst verification steps are complete and any errors have been corrected, the information will be submitted to RSA.

If an error is identified after data has been submitted to RSA, the IT Business Analyst will contact the RSA Data Unit staff to correct the data.

Pre-ETS Data Entry - Do's & Don'ts

Always Make Changes Using Red Font

Making the changes in red will allow the cleanup process to go quicker. We will be able to identify the students that did not get any updated for the current quarter. Those individuals will all need service information changed to "2" (received services last quarter but not this quarter.) Also, when you key the office code sheets after you are done with all of your school contracts you will see if you had a student on a school contract that will need to be changed to MVR office and updated.

Never Key in the Unique Identifier Fields

There are 2 different kinds of unique identifier numbers. The one that is assigned in the office (example BLG070001) and the one that is assigned in our data collection sheet process (example MT9990004500). You will never replace the MT999 number. It is assigned by the system and it will stay with that student.

Never Delete a Line that Already Exists on the Spreadsheet

Once a unique identifier is reported to RSA we must continue reporting that number.

Do Not Copy and Paste into the Excel Data Sheets

Do Not Key Duplicate Lines for a Student

Always use Find & Select. I know this is time consuming, but it will locate if there are more than one line. Try with Name, SSN, Student Id, and Date of Birth. The duplicate lines report duplicate data and will create a huge data sheet for us to wade through so this is extremely important.



Section 3

Pre-Employment Transition Services Forms Appendix



Forms Appendix

Commonly used forms, instructions and examples

1. Allowable and Unallowable Pre-Employment Transition Services: FAQ (5 pages)
2. Allowable and Unallowable Pre-ETS Services Chart
3. Authorization Guidelines
4. Billable Pre-ETS Activities Reference Guide
5. Case Filing Guide
6. Counselor Time Tracking Forms for Pre-ETS and Coordination Activities (Electronic)
7. Counselor Time Tracking Forms for Pre-ETS and Coordination Activities (Print)
8. Eligibility Letter for Students
9. FAQ Regarding the Continuation of Pre-ETS Under OOS
10. FAQ Regarding Subminimum Wage
11. Ideas for Pre-Employment Transition Services (6 pages)
12. Job Related Interest and Preference Inventory
13. Letter of Introduction
14. Pre-ETS Authorization Form
15. Pre-ETS Contract Work Plan (Attachment J)
16. Pre-ETS Invoice (Attachment I)
17. Pre-ETS Key Terms and Definitions (4 pages)
18. Pre-ETS Quarterly Report (Attachment K)
19. Pre-ETS School Fee Schedule (Attachment F)
20. Provider Fee Schedule
21. Steps to Self-Advocacy
22. Student Quarterly Reports for Pre-ETS
23. Student Request Form (4 pages)
24. VRBS Parent Letter for Student Request Form
25. VRBS Parent Letter for Student Request Form (MYLF and MYT)
26. OPI Memo on MOE
27. Pre-ETS OPI Accounting Guidance
28. WINTAC Time Allocation Guide

Allowable and Unallowable Pre-Employment Transitions Services: FAQ

1. Can Driver's Education be considered part of a workplace readiness curriculum and the costs charged to the funds reserved for pre-employment transition services?

This would not be an appropriate cost to be charged to the reserve as driver's education is an individualized VR service that must be provided under an IPE. Agencies should note that while driver's education would be considered a VR service and not an allowable pre-employment transition services, workplace readiness training could include curriculum that covered a general or broad discussion of the types of things students need to consider if they would look to obtain a license, versus other methods of transportation.

2. Can the cost of "travel training" for a student with a disability be considered an allowable charge to the funds reserved as a service under Workplace Readiness Training?

Yes, "travel training" would be appropriate under the required activity of workplace readiness training. Travel training is similar to Orientation & Mobility (O&M) training in that O&M is a service provided to individuals who are blind or visually impaired, while travel training is provided as a similar service to other individuals with disabilities who may need this type of training. Examples of travel training may include the preparation of a student with a disability to travel independently in their home, community, college, work based learning site, etc.

3. Are travel costs, meals and rooms acceptable if they can show that the expenses are for the staff to provide Pre-ETS for students with disabilities? In other words, if the teachers are transporting students to and from another town for work based learning, is that covered?

Transporting students would not be an allowable cost. You cannot charge the cost of student transportation to the funds reserved to Pre-ETS. Motel rooms and meals for students are also not an allowable charge to Pre-ETS. VR agencies may use funds reserved for the provision of pre-employment transition services to pay for VR staff or partners travel costs incurred as a direct result of providing pre-employment transition services, including lodging and meals. However, to the extent the VR counselor or partner is performing other duties as well, the VR agency is not permitted to charge the portion of travel costs, etc., for those other activities, to the funds reserved for the provision of pre-employment transition services.

4. Can the purchase of dedicated computers to provide career exploration be covered with Pre-ETS funding?

The dedicated computers would not be considered allowable because MCIS is used as a tool across the country for education to deliver its transition services under the IEP. Just because this could also be deemed a Pre-ETS service (we could see this as a comparable benefit), does not mean that VR could bear the cost of these computers as they could not say that they would only be used for VR students with disabilities for Pre-ETS that they should not also be getting that service under the IEP.

5. Can Pre-ETS money be used to fund a career fair in coordination with other school groups?

The costs associated with a Pre-ETS activity, in this case the career fair, would have to be solely for the benefit of student with disabilities in order to count the entire cost. If other individuals are benefitting or in this case attending the career fair and using the resources then the cost allocated to Pre-ETS would have to be in direct proportion to the students with disabilities served as a Pre-ETS activity. So if there were 100 students that attended, and 25 of them were students with disabilities who are attending the fair as a Pre-ETS activity, then they could only allocate 25% of the cost.

6. Can funds be used to create a vocational space and use funds towards appliances? They would be used for job training and teaching independent living skills.

Creating a vocational space may be considered establishment under the VR regulations which then you would have to meet all of the criteria for establishment if that would be the case. As for the purchase of appliances-if it is used for job training-that may be considered more of a comprehensive VR service vs a pre-ETS service. If they were trying to create a program to teach independent living skills under the workplace readiness training, it may be possible for them to include some costs for supplies but they would have to demonstrate that those supplies would solely be used for the benefit of only those students with disabilities receiving those specific Pre-ETS services.

7. Landscaping project-supplies and contracted professionals working alongside students?

What is the purpose of the project? Is this something that the school is already providing? Are they seeking to create a work experience that is geared specifically to landscape? With Pre-ETS, these services are supposed to be exposing students to work typically found in the community and in integrated settings. Setting something like this up in a school would look a lot like an enclave type of situation rather than a work experience. If the school was partnering with a local small business to provide students with work experiences at their landscape business that would be optimal.

8. Wages for administrators of school Pre-ETS program?

This is considered administrative cost and not allowed as use for the reserved Pre-ETS funds.

9. Purchase of equipment for training program for construction, agriculture, etc.?

What is the purpose of the project? Is this something that the school is already providing? Are they seeking to create a work experience that is geared specifically to landscape? With Pre-ETS, these services are supposed to be exposing students to work typically found in the community and in integrated settings. Setting something like this up in a school would look a lot like an enclave type of situation rather than a work experience. If the school was partnering with a local small business to provide students with work experiences at their landscape business that would be optimal. They would have to show that all equipment is used on for students with disabilities getting a specific Pre-ETS and no other students/entities can use them.

10. CNA certifications?

No, these items are not allowable costs for Pre-ETS funds. All of these items would be for employment training that results in job attainment/credential attainment that a VR agency would pay for with general VR 110 funds.

11. CPR and First Aid Certification for students?

No, these items would not be allowable costs for Pre-ETS funds. All of these items would be for employment training that results in job attainment/credential attainment that a VR agency would pay for with general VR 110 funds.

12. Licensed food handler training or OSHA 10 hour online General Industry Safety training?

No, these items would not be allowable costs for Pre-ETS funds. All of these items would be for employment training that results in job attainment/credential attainment that a VR agency would pay for with general VR 110 funds.

13. Can Pre-ETS funds modify or purchase AT for a student?

Pre-ETS funds may not be used to modify a student's personal equipment or devices, or to provide personal equipment or devices of which student would retain ownership.

14. Can you clarify whether or not interpreter or reader services, or accessible information materials necessary to ensure equal access could be provided not only during work-based learning experiences, but also during any of the required pre-employment transition services?

Interpreter or reader services or accessible informational materials necessary to ensure equal access to the work-based learning experience can be paid by the VR agency with reserved funds. To clarify, if an interpreter, reader or accessible informational materials are necessary for the purposes of providing pre-employment transition services, they may be allowable if not customarily provided by another entity, including local educational agencies.

VR agencies must analyze each cost to determine whether it: 1) fits within the scope of the itemized pre-employment transition services and 2) was incurred solely for the benefit of a "student with a disability." For example, workplace readiness training may include the provision of orientation and mobility training, such as travel training to access workplace readiness training, or learn to travel independently in the community. These acquired skills could be used by students with disabilities to access additional pre-employment transition services, if needed. Should a student with a disability need more individualized transition services, VR services or supportive services (e.g., travel expenses or job coaching services he or she would need to apply for and be determined eligible for VR services, and have an approved IPE to receive those services funded with non-Pre-ETS funds.

15. Should students be paid if the school profits from the business, if the business is part of a classroom training program, or under a club name (like DECA, FFA, etc.) where the funds are used for student- focused trips and events?

It is our understanding that as long as the school would not obtain an "immediate advantage" based on the work performed, the profits of the business go right back into the school based enterprise for additional supplies, materials, start- up fees for the following year, or as you referenced in your questions, student-focused trip and events. As long as the description of the school based enterprise make it clear that whatever benefit there is to the school is incidental and immaterial, no employees are being displaced, and other student without a disability are not getting paid for the same work; this would probably not constitute an employment relationship, and the student would not have to be paid. If you decide to pay a student, this will probably constitute an employment relationship, and you will need to pay the student at least minimum wages. Since payment would constitute an employment relationship between the school and the student, the student would technically be an employee of the school, and may be entitled to workers compensation insurance.

16. When VR pays a student a stipend, what must that stipend be based upon in order for the VR agency to allocate those funds toward the reserve?

The stipend should be that of the prevailing wage. If it is in a non-paid experience, the use of a stipend would be allowable and should be equivalent to that of what wage a person without a disability would make for the same type of work. A stipend for pre-employment transition services may only include allowable costs and may not include unallowable costs for the reserve such as maintenance and transportation expenses.

17. Are assessments an allowable pre-employment transition services expenditure?

VR agencies may provide interest inventories as a pre-employment transition service under job exploration counseling. However, assessment services to determine eligibility or priority for services, or determining VR needs would not be allowable expenditures under pre-employment transition services. However, the VR agency could perform these assessments, if the student were to apply for VR services.

18. When an employer requires a potentially eligible student come prepared for a WBL with steel toed shoes or other such items, can VR use reserve funds and pay for these expenses necessary for the student to participate.

It is permissible for VR agencies to reimburse an employer for costs incurred to provide a work-based learning experience, or to pay a fee charged by the employer that might include the cost for the purchase of additional uniforms for a student, or other costs incurred that are not individualized in nature but are necessary for the participation in the work-based learning experience. Should a student with a disability need more individualized transition services, VR services or supportive services he or she would need to apply for and be determined eligible for VR services, and have an approved IPE to receive those services funded with non-Pre-ETS funds. As such, an individual would need to apply for and be eligible for VR services in order to receive these items because such costs would constitute "maintenance". "Maintenance," as a VR service, goes beyond the scope of pre-employment transition services.

Allowable & Unallowable Pre-ETS Services

What does and doesn't the Pre-ETS Budget line cover?

ALLOWABLE SERVICES

UNALLOWABLE SERVICES

<p>Work Site Training</p> <p>Short term training provided by a Work Site Trainer on the job site to teach the student specific work tasks and general work behaviors.</p>	<p>Job Coaching</p> <p>Ongoing one-to-one training provided by a job coach on the job site as is required by the student with intensive needs to learn and maintain a job long term.</p>
<p>Assistive Technology</p> <p>Auxiliary aids and services necessary for students with disabilities to access or participate in pre-employment transition services are allowable.</p> <p>Examples include interpreter services, video-based telecommunication products, telephone handset amplifiers, assistive listening devices, screen reader software, large print materials, qualified readers, taped texts, audio recordings and Braille materials.</p>	<p>Assistive Technology</p> <p>Individually prescribed assistive technology and personal devices or services (prescription eyeglasses, hearing aids, readers for personal study or personal services) are not allowable.</p> <p>*Please note that screen reader software is allowable, but the computer on which it is installed is not an allowable Pre-ETS expense as it does not meet the definition of "auxiliary aids and services."</p>
<p>Student Travel Training</p> <p>Orientation and mobility training or travel training required by an individual to travel independently to access workplace readiness training or to participate in a work-based learning experience. (WBLE)</p>	<p>Student Transportation</p> <p>Costs associated with transporting student to/from Pre-ETS activity. *</p> <p>*For students found eligible for VR services, these costs may be covered under an approved IPE via different funds.</p>
<p>Maintenance</p> <p>It is permissible for VR agencies to use Pre-ETS funds to 1) Reimburse an employer or 2) pay an employer fee for costs incurred by the employer to provide a WBLE site for a student.</p> <p>Costs may include additional uniforms or other non-individualized items that are necessary for the student's participation in the WBLE.</p>	<p>Maintenance</p> <p>Purchase of individualized items (uniforms, special boots, or similar) on behalf of student or direct reimbursement to student for such items.*</p> <p>*For students found eligible for VR services, these costs may be covered under an approved IPE via different funds.</p>
<p>Other Expenses</p> <p>Wages for WBLE</p> <p>Training (e.g., Independent Living; Soft Skills) as required to participate in WBLE</p>	<p>Other Expenses</p> <p>Postsecondary tuition Registered Apprenticeships Vehicle Modifications Assessments (other than interest inventories)</p>

Authorization for Pre-Employment Transition Services

What to write on the PERQS Authorization Form.

Effective 5/9/2018

Student with a Disability: An individual who is in an approved educational program, is between the ages of 14-21 and is eligible for and receiving special education or related services under IDEA; or is an individual with a disability for purposes of section 504 of the Act; or is an individual with a disability who does not have a section 504 accommodation and is not receiving VR services under an IEP.

Use the “drop down” feature to choose a service category

Possible Services in Description	Guidelines
Pre-ETS: Job Exploration Counseling Interest Inventories Activities in MCIS Identification of career pathways	*up to 5 hours for job exploration activities
Pre-ETS: Work Based Learning Informational Interviews Work-site Tours Job Shadowing Volunteering <hr/> Internships Work Experiences Work Site Training	*up to 5 hours to set up <hr/> *up to 5 hours to set up *up to 3-40 hour experiences (up to 120 hours of wages total) *up to 10 hours to provide work site training for each 40 hour work experience *Documented Review required for additional hours
Pre-ETS: Counseling on Comprehensive Transition or Postsecondary Educational Programs Information on Course Offerings Campus Tours Counseling on types of academic training needed to succeed in the work place Advising students and parents on process and procedures	*up to 5 hours
Pre-ETS: Workplace Readiness Training Financial Literacy Skill Development Orientation & Mobility Skills Job Seeking Skills Soft Skills	*Up to 20 hours *Curriculum review by supervisor required for additional hours
Pre-ETS: Instruction in Self-Advocacy Disability Rights & Responsibilities How to request an accommodation Youth Leadership Activities	*Up to 20 hours

Please use the PERQS Authorization form for all services on this grid, regardless of provider type.

Wages are to be done on a separate authorization. Start the description with “**Wages**”. Include the number of hours and the hourly rate. (Example: **Wages: 40 hours at \$10.00 an hour**) Wages are billed under Pre-ETS. Job Coaching, Assistive Technology and Student Transportation are not considered to be Pre-Employment Transition Services. Intake & Planning Fees and Successful Outcome fees are not provided for students receiving Pre-Employment Transition Services (Pre-ETS).

Billable Pre-ETS

Activities Reference Guide

The following is a general guideline for acceptable billing to VR for Pre-Employment Transition Services (Pre-ETS). If you have questions about a service being billable, please call the counselor or counselor supervisor.

Job Coaching, Assistive Technology and Student Transportation are not considered to be Pre-Employment Transition Services. Intake & Planning Fees and Successful Outcome fees are not provided for students receiving Pre-Employment Transition Services (Pre-ETS).

An authorization must be received from the counselor before beginning any service.

- Initial case review
- Resume development
- Scheduled meetings with clients and staffings with client/counselor
- Interview skills training
- Documented phone calls to employers
- Visits to employers
- Work-site training
- On-site work-based learning checks with employers/clients
- Written reports for counselors
- Letters to clients
- Substantial phone calls to clients

Activities that VRBS will not pay for:

- Providing rides to clients or picking them up for appointments
- Providing “social work” activities to a client such as assisting with food stamps, housing, Social Security etc.
- Talking to the VR counselor for approval for services, updates, etc.
- Leaving phone messages for clients or listening to phone messages
- Scheduling appointments with clients over the phone
- Completing paperwork such as copying, filing, completing your forms, closing your case files, etc.
- Re-staffing and reviewing cases due to internal case transfers or new staff

Vendors need to make sure that they have hours authorized at the beginning of each month before starting services and counselors need to make sure they inform vendors when services are no longer authorized.

If a client is not maintaining contacts with the provider, please stop all activities and contact the VRBS counselor.

Case Filing Guide

2 Types of Files	Student with a Disability Receiving VR Services <i>and</i> Pre-ETS Services	Student with a Disability Waiting for VR Services Receiving Pre-ETS Services
Side 1		
Side 2	All Counselor Case Notes in chronological order. Pre-ETS case notes have the heading: Pre-ETS	All Counselor Case Notes in chronological order. Pre-ETS case notes have the heading: Pre-ETS
Bottom of Side 3	<p><u>Under a Pre-ETS Divider:</u></p> <ul style="list-style-type: none"> *Reports from Pre-ETS providers (CRP's, IL's, Colleges, etc.) *Acceptance Letter from College if student has graduated from High School and is enrolled in a Postsecondary Program. *Student Quarterly Pre-ETS Reports for Direct Provision/Comparable Benefits *Student Request Form 	<p><u>Under a Pre-ETS Divider:</u></p> <ul style="list-style-type: none"> *Reports from Pre-ETS providers (CRP's, IL's, Colleges, etc.) *Acceptance Letter from College if student has graduated from High School and is enrolled in a Postsecondary Program. *Student Quarterly Pre-ETS Reports for Direct Provision/Comparable Benefits *Proof of Pre-ETS Services provided prior to VR Eligibility Determination (Black Hole Procedure) *Student Request Form
Side 4		
Side 5		
Bottom of Side 6	<p><u>Under a Pre-ETS Divider:</u></p> <ul style="list-style-type: none"> *PERQS Authorizations & Paid POs for Pre-ETS 	<p><u>Under a Pre-ETS Divider:</u></p> <ul style="list-style-type: none"> *PERQS Authorizations & Paid POs for Pre-ETS

Counselor Time Tracking Form for Pre-Employment Transition Services and Coordination Activities

Office: Choose an office.

Counselor Name: Click here to enter name.

Pre-ETS Activities for pay period ending: Click here to enter a date.

Date	Student Name or Group Info	Activity (use codes below)	Direct Service Hours	Travel Hours
		Totals ->		

Total Pre-ETS Hours: Click here to enter amount.

VR Pre-ETS Task Profile ID: 691KL209 or BLV Pre-ETS Task Profile ID: 691KJ119

Pre-Employment Transition Services

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

Pre-ETS Transition Coordination Activities

6. Attend Individualized Education Program (IEP) meetings
7. Develop work opportunities for students with disabilities
8. Work with schools to coordinate pre-employment transition services
9. Attend person-centered planning meetings

Counselor Signature: Click here to enter text. Date: Click here to enter text.

Supervisor Signature: Click here to enter text. Date: Click here to enter text.

Counselor Time Tracking Form for Pre-Employment Transition Services and Coordination Activities

Office: _____

Counselor Name: _____

Pre-ETS Activities for pay period ending: _____

Date	Student Name or Group Info	Activity (use codes below)	Direct Service Hours	Travel Hours
		Totals ->		

Total Pre-ETS Hours _____

VR Pre-ETS Task Profile ID: 691KL209 or BLV Pre-ETS Task Profile ID: 691KJ119

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Pre-ETS Transition Coordination Activities

6. Attend Individualized Education Program (IEP) meetings
7. Develop work opportunities for students with disabilities
8. Work with schools to coordinate pre-employment transition services
9. Attend person-centered planning meetings

Counselor Signature: _____ DATE _____

Supervisor Signature: _____ DATE _____



Department of Public Health and Human Services

Missoula Office ♦ 2675 Palmer St. Ste A ♦ Missoula, Montana 59808

(406) 329-5400 ♦ Fax: (406) 329-5420 www.dphhs.mt.gov

Steve Bullock, Governor
Sheila Hogan, Director

DATE

NAME
ADDRESS
ADDRESS

Dear :

You have been found eligible for Vocational Rehabilitation services. Vocational Rehabilitation and Blind Services (VRBS) offers two different programs: Traditional Vocational Rehabilitation services and Pre-Employment Transition Services (Pre-ETS). Currently, there is a waiting list for Traditional Vocational Rehabilitation services and your name has been added to this list. However, because you are a student with a disability, you are eligible to immediately receive Pre-Employment Transition Services outside of the waiting list that can help you prepare for work. Please feel free to contact me to discuss these services that are available to you.

Please also note that VRBS is operating under an Order of Selection whereby eligible individuals receive traditional Vocational Rehabilitation services based on their priority categories. You have been assigned to the following priority category:

() Priority One: Eligible individual with a most significant disability that results in serious functional limitations in three or more functional capacities.

() Priority Two: Eligible individual with a significant disability that results in serious functional limitations in two functional capacities.

() Priority Three: Eligible individual with disabilities.

When resources become available, you will be contacted and those in your category will be provided vocational rehabilitation services in order based on their application date. Individuals in higher categories will get services before those in lower categories.

If you have questions or are dissatisfied with this decision, please call me at (406) XXX-XXXX or toll free at (877) XXX-XXXX. I look forward to helping you meet your employment goals.

Sincerely,

Rehabilitation Counselor

FAQ Regarding Subminimum Wage

1. If a youth refuses to participate in the VR process or to receive career counseling services, can they still work in subminimum wage:

Response: "If a youth chooses not to participate in the activities required by section 511 of the Act and final part 397, or chooses to opt out of the vocational rehabilitation process entirely, such a choice will impact the permissibility of the youth to work at subminimum wage and preclude him or her from obtaining subminimum wage employment given the limitations imposed by section 511 of the Act and final part 397. Accordingly, [CRP]s should inform youth with disabilities and/or their guardians of the youth's ineligibility for subminimum wage employment if he or she refuses to participate in the required activities."

2. If a school system has a contract with an entity to pay youth a sub-minimum wage that was begun prior to the publication of the regulations, is that contract 'grandfathered' in?

Response: No

3. If a youth informs the VR agency that they are not interested in pursuing competitive integrated employment, can the youth be found ineligible and work in subminimum wage employment if they fulfill all other requirements for Section 511?

Response: If a youth makes an informed choice not to pursue competitive integrated employment, the youth can be determined ineligible for VR services any time after application and may enter subminimum wage employment if they have fulfilled the other requirements in Section 511. The basis for this determination is found in 34 CFR 361.43.

4. If a youth wishes to enter subminimum wage employment but did not receive transition services, or does not have proof of completion of transition services and the information is not available from any school, and the youth did not receive pre-employment transition services, how can the youth fulfill the requirements for this documentation prior to entering subminimum wage employment assuming they fulfill the other requirements?

Response: If the youth did not receive transition services or there is no documentation available verifying this fact, and the youth did not receive pre-employment transition services, then this requirement is waived and the youth can go about fulfilling the other requirements of Section 511 and enter subminimum wage employment if all other requirements are met. The VR program must document that verification of transition and/or pre-employment transition services is not available.

FAQ Regarding the Continuation of Pre-ETS Under OOS

1. Can you please clarify whether or not a student can complete all pre-ets services needed or only the service they started once they apply for VR and are subject to the states OOS?

Response: If a student with a disability begins one or more of the required activities prior to being determined eligible for VR services, he or she may continue to receive any and all pre-employment transition services even if the student is assigned to a closed OOS category. In addition to the pre-employment transition services, the student may participate in group transition services while in a closed OOS category; however, the student may not receive any individualized VR services, including individualized transition services, until his or her turn for receipt of VR services comes up under the State's order.

Ideas for Pre-Employment Transitional Services

Following are examples of Pre-ETS activities in the five “required” categories and how they may be provided to individual students with disabilities who are enrolled in high school (ages 14-21) in either a group or an individualized setting.

Please note: this list is not all-inclusive.

1. Job Exploration



may be provided in a classroom or community setting and include information regarding in-demand industry sectors and occupations, as well as non-traditional employment, labor market composition, administration of vocational interest inventories, and identification of career pathways of interest to the students. Job exploration counseling provided on an individual basis might be provided in school or the community and include discussion of the student’s vocational interest inventory results, in-demand occupations, career pathways, and local labor market information that applies to those particular interests.



- Help students complete interest inventories and explore careers using various paper and online resources.
- Provide opportunities for work on career exploration tools such as the Montana Career Information System (MCIS) (<https://mtcis.intocareers.org/>) and the Montana Department of Labor & Industry Career Resources website (www.careers.mt.gov).
- Assist students to explore O*NET OnLine (<https://www.onetonline.org/>), a tool for career exploration and job analysis.
- Provide opportunities to explore Transition-to-Work inventories and facilitate follow-up discussions afterward.
- Offer a high school course on career choices.
- Provide experience interviewing workers in the community during local business tours.
- Arrange for students to hear guest speakers talking about a variety of jobs and careers (online and/or in person).
- Coordinate a panel of entrepreneurs to speak to students.
- Coordinate a panel of Tribal Elders or an intergenerational panel on Employment and Native Trades.
- Provide a career fair or “real life fair” for high school students.
- Create virtual job shadows that students can watch online.
- Explore pre-apprenticeship programs.
- Share information about the differences between labor market employment and negotiated employment.
- Conduct a Group Discovery Class in the classroom to gather information about student skills, support needs, strengths and experiences.



- Contract with a non-school employee to conduct a class on career exploration.
- Arrange for a group of students or an individual student to visit various community businesses to learn about different jobs in their community.
- Pay guest speakers to organize and conduct several classes on self-employment as a career choice.

- Purchase curriculum or software that supports the exploration of students' interests around careers and employment.
- Pay a guest speaker to organize and conduct several classes on Group Discovery.
- Contract with an outside entity to perform the process of Discovery for students with significant impact of disabilities who will benefit from a Customized approach versus a competitive approach to employment.
- Purchase materials needed to support student activities around job exploration counseling.



2. Work-Based Learning Experiences

which may include in-school or after-school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment in the community to the maximum extent possible. Work-based learning experiences in a group setting may include coordinating a school-based program of job training and informational interviews to research employers, work-site tours to learn about necessary job skills, job shadowing, or mentoring opportunities in the community. Work-based learning experiences on an individual basis could include work experiences to explore the student's area of interest through paid and unpaid internships, apprenticeships (not including pre-apprenticeships and Registered Apprenticeships), short-term employment, fellowships, or on-the-job trainings located in the community. These services are those that would be most beneficial to an individual in the early stages of employment exploration during the transition process from school to post-school activities, including employment.

Note: Should a student need more individualized services (e.g., job coaching, orientation and mobility training, travel expenses, uniforms or assistive technology), he or she would need to apply and be determined eligible for vocational rehabilitation services and develop and have an approved individualized plan for employment.



- Coordinate with local Job Service personnel to provide in-school sessions and/or visits to the local Job Service office.
- Build a network of local community-based work experiences, including opportunities for one-day job shadows and longer term work experiences.
- Facilitate job shadowing and mentoring at local businesses.
- Identify individuals who have disabilities and can offer first-hand accounts to share with students about their work-based experiences.
- Make arrangements for students to take advantage of work-based learning experiences.
- Organize a group of community members (including parents) who can help identify and recruit work experience sites in the community.
- Provide school staff to facilitate work-based learning experiences for students.
- Develop a system for gathering information about student skills, support needs, strengths and experiences from each work experience.
- Connect students with adult agencies that provide ongoing employment supports after graduation.
- Consider adult agencies and the school co-supporting students in work experiences and paid jobs before graduation.
- Learn about what is happening with economic development in the local community.
- Partner with One-Stop Centers and Job Service offices on work-based learning opportunities.
- Enroll students in Jobs for Montana's Graduates and develop a system to track the Pre-Employment Transition Services they receive as part of the program.
- Help students access summer Youth Employment Programs through Workforce/HRDCs.

- Connect with other local agencies, organizations and service clubs committed to preparing workforce members, such as Chambers of Commerce, Rotary, Lions Clubs, etc.
 - Explore corporate internship opportunities.
- Contract with an employment agency to develop and support community-based work experience sites, internships, apprenticeships for students, and/or paid jobs.
- Expand current school staff to add a position to provide support for students in work-based learning.
 - Arrange for students to participate in community-based experiences.
 - Cover additional costs incurred by the employer for providing the work-based learning experience.
 - Pay student wages during an employment experience (must be at least minimum wage).
 - Fund the creation of a summer work experience program or contract with an employment provider to provide work experiences for students over the summer.



3. Counseling on Opportunities for Enrollment in Post-Secondary Education

in a group setting may include information on course offerings, career options, the types of academic and occupational training needed to succeed in the workplace, and post-secondary opportunities associated with career fields or pathways. This information may also be provided on an individual basis and may include advising students and parents or representatives on academic curricula, college application and admissions processes, completing the Free Application for Federal Student Aid (FAFSA), and resources that may be used to support individual student success in education and training, which could include disability support services.



- Support students in compiling a transition binder with relevant agency/organization contact information (for example, Vocational Rehabilitation and college support services).
- Provide opportunities to participate in “College in a Day” at local college campuses.
- Support students to participate in the “Movin’ On in Montana” campus experience.
- Invite recent graduates back to school to talk about their experiences transitioning to college and the differences between high school and college.
- Collect examples of college application paperwork and discuss needed requirements with students.
- Learn about accommodations for college entrance testing and SAT and ACT test preparation.
- Collaborate with the school counselor to provide opportunities to discuss post-secondary education options and visit local post-secondary education campuses.
- Invite the local Vocational Rehabilitation and Blind Services (VRBS) counselor to present information to students about the VRBS program.
- Offer a “Trades Rodeo” for students to learn more about practical trades, including opportunities for apprenticeships and ways of learning on the job in a trade or industry.
- Collaborate with math teachers and/or college staff to offer specific lessons on financial planning and budgeting for college and how to research financial aid opportunities such as Pell grants, ABLA (Achieving a Better Life Experience) accounts, and PASS (Plan to Achieve Self-Support) plans.
- Educate students on the differences between special education services in high school and disabled student services on campus.
- Help students learn about various supports and assistive technology used by students with disabilities at college, such as where and how to get alternative formats of textbooks.
- Provide students with resources to learn about TRIO Student Support Services, TRIO-Upward Bound, and Disability Services for Students.
- Explore statewide Job Corps options.
- Plan a visit with students to a local Job Corps campus.

- Explore electronic mentoring between high school students and college students with disabilities.
- Explore dual enrollment options at local colleges for high school and college credit.

-  Support students to visit college and/or post-secondary education entities or participate in a “Movin’ On in Montana” session.
- Hire someone to create and teach a get-ready-for-college class.



4. Workplace Readiness Training

may include programming to develop social skills and independent living, such as communication and interpersonal skills; financial literacy; orientation and mobility skills; job-seeking skills; and understanding employer expectations for punctuality and performance, along with other “soft” skills necessary for employment. These services may include instruction, as well as opportunities to acquire and apply knowledge. They may be provided in a generalized manner in a classroom setting or be tailored to an individual’s needs in a training program provided in an educational or community setting.



- Offer soft skills training to facilitate awareness of social skills and personal strengths and challenges in the workplace.
- Explore existing soft skills training. For example: through local Job Service offices; Easter Seals-Goodwill Peer Connections (easterseals.com/esgw/our-programs/autism-asd-services/peer-connections.html); Missoula-based JOBS’s (Job Opportunity-Based Services) Job Ready program (<http://www.jobsinfmt.com/jobreadyprogram.html>); MYTransitions’ Soft Skills Academies (<http://montanayouthtransitions.org/soft-skills-academies/>); Centers for Independent Living; and the Office of Disability Employment Policy’s (ODEP) “Skills to Pay the Bills” curriculum (<http://www.dol.gov/odep/topics/youth/softskills/>).
- Assist students with workplace readiness training using transition curriculum from Life Centered Education <https://www.cec.sped.org/Publications/LCE-Transition-Curriculum> or Attainment Company <http://www.attainmentcompany.com/>.
- Teach students strategies to promote independence at work such as time management, moving from task to task, and self-monitoring production and performance.
- Teach students to request and use assistive technology.
- Teach workplace vocabulary and support students to develop competent communication for the workplace. Develop strategies for augmentative and alternative communication if needed.
- Have students participate in financial readiness classes through local banks.
- Offer financial literacy instruction addressing such topics as getting a paycheck, calculating the impact of wages on SSI, reporting wages to the Social Security Administration, applicable Social Security work incentives, saving, and budgeting.
- Support students to develop a portfolio or file of important papers for after graduation. Contents might include Social Security card, birth certificate, employment information, references, resume, etc.
- Provide and discuss examples of job descriptions, compensation and taxes, workplace expectations, and evaluation/performance appraisal documentation.
- Provide opportunities to practice form completion and the gathering of required documentation/verification (for example, background check applications, health information and insurance paperwork, picture identification cards, and W-9 tax forms).
- Provide opportunities for students to take the WorkKeys evaluations at registered sites either in school or at local Job Service offices.
- Teach workplace expectations such as work hours and breaks, vacation time, annual holidays, personal hygiene, maintenance of uniforms, health and safety requirements, etc.

- Offer opportunities for students to learn basic first aid for the workplace.
- Partner with the Regional Transition Committee and/or the local Center for Independent Living for ideas around workplace readiness.
- Provide “transportation and travel” training. Determine if travel trainers are available through Vocational Rehabilitation and Blind Services or the local Center for Independent Living.
- Connect students with the Summit Independent Living Center-BASE Program improvisation class.
- Connect with other schools that have Pre-Employment Transition Services ideas and information to share.
- Invite employers to present to students about what skills they are looking for in employees.
- Host practice interview sessions. Check with the local Adult Basic and Literacy Education program and/or Job Service to see if they can assist with this.
- Create opportunities to teach students customer service skills. Examples of such opportunities include a school store, concessions at school events, and school-run businesses such as the Harlo Theatre featured in the show “Backroads of Montana”.
- Create a job club/class to practice job skills.
- Explore resources such as the Workforce Recruitment Program by visiting the ODEP website at <http://www.dol.gov/odep/>.
- Explore the “Working Well with a Disability” curriculum with the local Center for Independent Living and/or the Rural Institute for Inclusive Communities. What aspects of this curriculum would fit for students?

Hire or contract with someone to facilitate the MYT Soft Skills class.

- Hire someone to teach self-management strategies for students using technology.
- Contract with an Independent Living Center or SSA Benefits Specialist to teach a class about work and Social Security benefits.
- Support students to attend a community-based financial literacy class (at a job service, local bank or credit union).

5. Instruction in Self-Advocacy

in a group setting may include generalized classroom lessons in which students learn about their rights, responsibilities, and how to request accommodations or services and supports needed during the transition from secondary to postsecondary education and employment. During these lessons, students may share their thoughts, concerns, and needs, in order to prepare them for peer mentoring opportunities with individuals working in their area(s) of interest. Further individualized opportunities may be arranged for students to conduct informational interviews or mentor with educational staff such as principals, nurses, teachers, or office staff; or they may mentor with individuals employed by or volunteering for employers, boards, associations, or organizations in integrated community settings. Students may also participate in youth leadership activities offered in educational or community settings.

- Compile a library of relevant materials which focus on self-advocacy in order to support individualized education planning for activities within the Transition Services Needed section of the IEP. These may be online or paper resources.
- Support students to explore job-specific and disability-specific assistive technology, as well as how to pay for the assistive technology.
- Encourage students to participate in the Montana Youth Leadership Forum (MYLF).
- Fund peer mentors (college students or graduates with disabilities) to share their experience identifying their own support needs, requesting accommodations, using Disability Student Services on college campuses and other post-secondary education opportunities.

- Support students in setting one or two relevant personal self-advocacy goals for the school year (for example, keeping a calendar, making medical appointments, and participating in required transition evaluations for moving from pediatric to adult health and/or mental health services).
- Provide opportunities for students to practice discussing their individual strengths and challenges, as well as how their individual special educational needs might impact their work performance and how they can manage such impacts.
- Use the application to attend the annual MYTransitions Conference (or any such conference or activity) as a teaching exercise in self-advocacy (learning how to complete applications for scholarships and grants, arranging travel and lodging arrangements, etc.).
- Support students to participate in the youth track at the annual MYTransitions Conference.
- Engage graduated students to speak to students about their recent life experiences in self-advocacy.
- Provide opportunities for students to plan and attend visits and/or meetings with local Vocational Rehabilitation and Blind Services (VRBS) counselors and/or college-based staff to research opportunities for post-secondary employment and education.
- Teach a class about identifying support needs and asking for accommodations at college.
- Teach a class on disability disclosure using The 411 on Disability Disclosure: A Workbook for Youth with Disabilities publication available for download at <http://www.ncwd-youth.info/publications/the-411-on-disability-disclosure-a-workbook-for-youth-with-disabilities/>
- Teach a class about negotiating a customized position instead of applying for an existing position, including how to explain what the student needs in a workplace to best contribute to the employer.
- Teach students to create and use visual resumes to share their “best self”, disclose disability, explain assistive technology needs, and ask for accommodations.
- Provide opportunities for students to network with adults to learn about their experiences and what helped them succeed.
- Review “Living Well with a Disability” and “Working Well with a Disability” (<http://livingandworkingwell.ruralinstitute.umt.edu/>). Could portions be used with students in schools?
- Offer students and parents information on Supported Decision Making and alternatives to guardianship.
- Teach students about voting and other civic duties and privileges.
- Encourage and support students to lead their own IEP meetings. Identify existing resources to teach students to lead their meetings, or create visual resources to help students envision this possibility.
- Teach individuals with communication difficulties to find and use their voice.
- Connect students with the local Centers for Independent Living (CIL). Ask about their advocacy/self-advocacy curricula (for example, Summit’s “Building Advocacy and Learning Leadership Skills” or BALLS, and “Youth Opening Doors through Advocacy” or YODA; Disability History classes; etc.).
- Explore the Job Accommodation Network website (<https://askjan.org/>) to learn about successful accommodations used in the workplace by people with disabilities.
- Introduce students to the Montana Council on Developmental Disabilities Self-Determination Toolkit at <https://www.mtcdd.org/self-determination-toolkit/>.



- Support students to participate in MYLF, mini-MYLF programs and/or the MYTransitions Conference.
- Contract with an Independent Living Center to teach a class about self-advocacy, disability rights and responsibilities, disability disclosure, and requesting accommodations.

Name: _____ Date: _____

Job-Related Interest and Preference Inventory

1. What job(s) would you like to have when you finish school?

2. Why are you interested in particular jobs you listed above?

3. What hours or time of the day do you want to work? (Check all that apply)
 - 7:00 – 3:00 (early morning, but get off early)
 - 9:00 – 5:00 (mid-morning)
 - 12:00 – 8:00 (afternoon, get off late)

4. Are you willing to work nights or weekends, if the boss asks you to?
 - Yes
 - No

5. Do you want to work indoors or outdoors?
 - Indoors
 - Outdoors

6. Would you rather be standing or sitting at work?
 - Standing
 - Sitting

7. Do you prefer to work alone or with other people?
 - Alone
 - With others

8. Do you want to work at a fast-paced and busy place or at a slow place?
 - Fast-paced
 - Slow-paced

9. Do you like it to be noisy or quiet when you work?
 - Noisy
 - Quiet

10. Do you prefer music or no music playing where you work?
 - Music
 - No music

11. Do you prefer a job that makes you wear a uniform?

- Uniform
- No Uniform

12. Do you want a job that requires you to dress up in nice clothes for work?

- Nice clothes
- Casual clothes

13. Do you prefer to work for a business with a lot of employees or with just a few employees?

- Many employees
- Few employees

14. What kind of setting(s) do you want to work in (check all that apply)

- Hospital
- Stock room
- Animals
- Home
- Business
- Farm
- Hotel
- Office
- Store front
- Water
- Cubical
- Shopping mall

15. How far/long are you willing to travel to get to work?

- 10-15 min
- 15-30 min
- 30-60 min

16. What are your favorite places to go in the community?

17. What are your favorite subjects at school? Why?



Department of Public Health and Human Services

Missoula Office ♦ 2675 Palmer St. Ste A ♦ Missoula, Montana 59808
(406) 329-5400 ♦ Fax: (406) 329-5420 www.dphhs.mt.gov

Steve Bullock, Governor

Sheila Hogan, Director

Dear Parent or Guardian:

Vocational Rehabilitation and Blind Services (VRBS) is a program that helps individuals with disabilities to be successful in employment. The counselor's role is to work with students with disabilities to assist them in exploring their career interests, identify their skills & abilities related to work and to support them in creating a plan for employment after they graduate. This plan may include career guidance and counseling, on the job training, college training, job development and placement services, assistive technology or other services needed to help them get and keep a job.

In order to determine if they are eligible for our program, an application for services must be completed. In this packet you will find general information about our program as well as the documents needed for the application process. These documents include:

Informational Brochures: The brochures provide information about eligibility for VRBS, potential services, and contact information for the Montana Youth Transitions website. There is also a booklet for the Client Assistance Program that can provide advocacy for individuals participating in our program.

Application: The application includes basic demographic information such as Social Security number, address, and phone number as well as more specific information about the type of disability experienced and work history. If additional space is needed to identify sources of medical or psychological information, a records contact sheet has been provided to list these contacts.

Application Public Disclosure: This is a two-page sheet that reviews the service relationship, confidentiality, client rights and responsibilities. **This document will require the signature of both you and your student if they are under 18 years of age.** There are two copies; one is for your records.

Privacy Policy: Confidentiality is important to our program. A copy of our Notice of Use of Protected Health Information (Privacy Policy) is included. **This will require you and your student's signature.** There are two copies; one is for your records.

Release of Information Forms: In order to access the records needed for eligibility determination a few Release of Information forms are included. These forms allow our program to access confidential information about your student to verify that they have a disability that may impact their ability to work. A release for your student's school and two blank releases for additional medical/psychological records are included. Please complete the top section of each release to identify the source of records. Then initial next to each type of information that can be released to VRBS. Signatures are required on the consumer and guardian lines of the release form. If additional releases are needed they can be provided to the student.

These forms may seem overwhelming; please do the best that you can to assist your student with completion of the document provided. A counselor will further assist them at the application appointment to complete any missing information. If you have any additional academic, medical or psychological records dated within the last 3 years that would assist with the eligibility determination process, please include them in the application packet. Please let the counselor know if you need copies made and your records returned to you.

Please note that Vocational Rehabilitation and Blind Services is currently operating under an Order of Selection. Any student who applies for services and is determined eligible will be placed on a state-wide waiting list. Additional information about the Order of Selection is included in the packet. **Even though our program currently has a waiting list, it is strongly suggested that your student apply for VRBS services.** If your student is found eligible for services, being placed on the waiting list guarantees your student will receive VRBS services once the funding becomes available.

If you have any questions about this process or would like to attend the follow-up meeting, please feel free to contact the Vocational Rehabilitation and Blind Services office at (406) XXX-XXXX.

Sincerely,

Rehabilitation Counselor

Pre-Employment Transition Services Authorization Form

Identification Number: _____ Purchase Order Number: _____

Client Name: _____

Provider: _____

Address: _____

Description of Services Authorized:

Service Category*	Start Date	End Date	Provider Type	Hours	Rate	Amount

*Speed Chart is noted in Service Category Description. X stands for the federal fiscal year the cost is associated with. Please be aware of service dates to determine federal fiscal year.

Authorization Total: _____

Counselor Signature and Number

Date

Counselor Supervisor Signature

Date

Pre-ETS Contract Work Plan – Attachment J

High School:	
Goals and Objectives under this contract	
Goal:	
Objective	Measures
Job Exploration Counseling	
Work-Based Learning Experiences	
Counseling on Opportunities for Enrollment in Comprehensive Transition or Postsecondary Education	
Work Place Readiness Training	
Instruction in Self-Advocacy	

Contractor Signature:

_____ Date _____



**Vocational
Rehabilitation & Blind
Services**

Disability Employment & Transitions
Division

ATTACHMENT I - INVOICE

Invoice Service Dates:			
Calendar Year _____			
<input type="checkbox"/> Jan-Mar	<input type="checkbox"/> Apr-Jun	<input type="checkbox"/> Jul-Sept	<input type="checkbox"/> Oct-Dec
Contract #:		Tax ID #:	
Contractor Name/School District:			
Contractor/School District Address and County:			

High School Name(s) Where Services Were Provided	# of Qualifying Students Served	Quarterly Fee
Invoice Total:		

Please attach all supporting documents, including the quarterly Pre-ETS report, to this invoice before submitting to Vocational Rehabilitation & Blind Services for payment.

I certify to the best of my knowledge that the invoiced amount above is correct and that all services under this contract have been provided for this time period stated above:

Signature of Contractor's Authorizing Official

Date

Printed Name and Title

Departmental Approval:

Signature(s)-Local Field Ofc Representative	Approved Amount	Date

Pre-ETS Terms and Definitions

Potentially eligible students are defined as:

- Students with a disability who have not yet applied or been made eligible for VR services

Student with a disability is an individual who:

- Is in a secondary, postsecondary or other recognized education program and
- Is not younger than 14 years of age
- Is not older than 21 years of age
- Is eligible for and receiving special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.); or is an individual with a disability receiving services under a section 504 plan; or is an individual with a documented disability who does not have a section 504 accommodation and is not receiving services under an IEP.

The Five Required Pre-Employment Transition Services:

1. **Job Exploration Counseling** - Job Exploration Counseling is meant to provide students with a variety of opportunities to gain information about careers, the skills needed for different jobs and to uncover personal career interests. If provided as pre-employment transition services, job exploration counseling may be provided in a group setting or on an individual basis, and may include information regarding in-demand industry sectors and occupations, as well as non-traditional employment, labor market composition and vocational interest inventories to assist with the identification of career pathways of interest to the students
2. **Work based learning** - Work Based Learning (WBL) is an educational approach or instructional method that uses community workplaces to provide students with the knowledge and skills that will help them connect school experiences to real-life work activities and future career opportunities. WBL may include in-school or after-school opportunities, experiences outside the traditional school setting, and/or internships. When paid WBL experiences are provided, the wages are to be paid at no less than minimum wage.
3. **Counseling on opportunities for enrollment in comprehensive transition or post-secondary education programs at institutions of higher education** - information and guidance on a variety of post-secondary education and training opportunities. These services may include information on course offerings, career options, types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with a career field or pathways. It may also include advising students and family members on academic curricula, college application and admissions processes, completing the Free Application for Federal Student Aid (FAFSA), and resources that may be used to support individual student success in education and training, to include disability support services.
4. **Workplace readiness training to develop social skills and independent living** - Workplace readiness traits describe a number of skills that employers expect from most employees. Workplace readiness skills are a set of skills and behaviors that are necessary for any job, such as how to interact with supervisors and co-workers and the importance of timeliness. These skills

are sometimes called soft skills, employability skills, or job preparation skills. These skills help students learn and build an understanding of how we are perceived by others.

5. **Self-advocacy skills** – includes an individual’s ability to effectively communicate, convey, negotiate or assert his/her own interests and/or desires; develop self-determination; enable students to advocate for any support services, including auxiliary aids, services, and accommodations that may be necessary for training or employment.

- Knowledge of self
- Knowledge of rights and responsibilities
- Communication skills
- Leadership skills

Pre-Employment Transition Coordination:

- Attending individualized education program meetings for students with disabilities, when invited;
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
- Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
- When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

Pre-Employment Transition Services Authorized Activities:

Funds remaining after the provision of the required Pre-ETS activities may be used to improve the transition of students with disabilities from school to postsecondary education or an employment outcome by:

- (1) implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces;
- (2) developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently, participate in postsecondary education experiences, and obtain, advance in and retain competitive integrated employment;
- (3) providing instruction to vocational rehabilitation counselors, school transition personnel, and other persons supporting students with disabilities;
- (4) disseminating information about innovative, effective, and efficient approaches to achieve the goals of this section;
- (5) coordinating activities with transition services provided by local educational agencies under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);
- (6) applying evidence-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to better achieve the goals of this section;
- (7) developing model transition demonstration projects;
- (8) establishing or supporting multistate or regional partnerships involving States, local educational agencies, designated State units, developmental disability agencies, private businesses, or other participants to achieve the goals of this section; and
- (9) disseminating information and strategies to improve the transition to postsecondary activities of individuals who are members of traditionally unserved populations.

Pre-Employment Transition Services Common Terms and Acronyms:

Customized Employment (CE)

Customized employment is a flexible process designed to personalize the employment relationship between a job candidate and an employer in a way that meets the needs of both. It is based on an individualized match between the strengths, conditions, and interests of a job candidate and the identified business needs of an employer. Customized Employment utilizes an individualized approach to employment planning and job development.

Competitive Integrated Employment (CIE)

Work performed by a person with a disability in a setting that has a balance of peers with and without disabilities. Wages are at least minimum wage or higher and at a rate comparable to non-disabled workers performing the same tasks.

To satisfy the definition of "competitive integrated employment," which is one of the types of employment outcomes permitted under the VR program, the employment must satisfy the requirements for all three components:

1. Competitive earnings;
2. Integrated Location; and
3. Opportunities for advancement.

This means that if an individual's employment fails to satisfy any one of the above components, the employment will not meet the definition of "competitive integrated employment."

Community Rehabilitation Provider (CRP)

A CRP is a program that can directly provide or facilitate vocational rehabilitation services as one of its major functions. The purpose of these services is to enable those individuals to maximize their opportunities for employment.

Free Application for Federal Student Aid (FAFSA)

A form that can be prepared annually by current and prospective college students (undergraduate and graduate) in the United States to determine their eligibility for student financial aid.

Family Education Rights and Privacy Act (FERPA)

A federal privacy law that gives parents certain protections with regard to their children's education records, such as report cards, transcripts, disciplinary records, special education records, contact and family information, and class schedules.

Fair Labor Standards Act (FLSA)

Establishes minimum wage, overtime pay, recordkeeping, and child labor standards affecting full-time and part-time workers in the private sector and in Federal, State, and local governments.

Individuals with Disabilities Education Act (IDEA)

Federal law that makes available a free appropriate public education to eligible children with disabilities throughout the nation and ensures special education and related services to those children.

Individualized Education Program or Plan (IEP)

An Individualized Education Program (IEP) is a written statement of the educational program designed to meet a student's individual needs. Every child who receives special education services must have an IEP. The IEP has two general purposes: 1) to set reasonable learning goals for a student, and 2) to state the services that the school district will provide for the student.

Individualized Plan for Employment (IPE)

The Individualized Plan for Employment (IPE) is a written plan outlining an individual's vocational goal, and the services to be provided to reach the goal.

Occupational Information Network (O*NET)

The O*NET system is maintained by a regularly updated database of occupational characteristics and worker requirements information across the U.S. economy. It describes occupations in terms of the knowledge, skills, and abilities required as well as how the work is performed in terms of tasks, work activities, and other descriptors

ATTACHMENT K – QUARTERLY REPORT

School District:	Calendar Year:
School Name:	<input type="checkbox"/> January – March Due by April 30th
City, State & Zip:	<input type="checkbox"/> April – June Due by July 31st

<u>Student's Name*</u>	<u>Student's Social Security Number</u>	<u>Student's Birthdate</u> (YYYYMMDD)	<u>Student's Disability Status</u>	<u>Student's Ethnicity</u> 1--Student is Hispanic or Latino 0--Student is not Hispanic or Latino 9-Ethnicity not identified	<u>Student's Race</u> AI-American Indian A-Asian B-Black NH-Native Hawaiian W-White 9-Race not identified	<u>Pre-ETS Received</u> 1- Job exploration counseling 2- Work-based learning 3-Counseling on transition or postsecondary education 4-Workplace readiness training 5-Instruction in self-advocacy

*The student's name is requested, but not required if all other information is provided.

List and describe the Pre-Employment Transition Services that were provided this quarter. Please include specific activities, dates and outcomes.

What did you implement that you are most proud of?

What challenges, if any, are you experiencing in providing Pre-Employment Transition Services?

I have reviewed this information and attest that it is accurate.

Authorized Signature for School District

Date

Printed name of person completing this form

Phone Number

Pre-ETS School Fee Schedule – Attachment F

Pre-Employment Transition Services		
Contract Fee Schedule		
Number of Pre-ETS Students served per High School, Minimum	Number of Pre-ETS Students served per High School, Maximum	Quarterly Payment Amount
1	5	\$ 2,500.00
6	10	\$ 3,750.00
11		\$ 5,000.00
16	20	\$ 6,250.00
21		\$ 7,500.00
26	30	\$ 8,750.00
31		\$ 9,687.50
36	40	\$ 10,625.00
41		\$ 11,562.50
46	50	\$ 12,500.00
51		\$ 13,437.50
56	60	\$ 14,062.50
61		\$ 14,687.50
66	70	\$ 15,312.50
71		\$ 15,937.50
76	80	\$ 16,562.50
81		\$ 16,875.00
86	90	\$ 17,187.50
91		\$ 17,500.00
96	100	\$ 17,812.50
101		\$ 17,875.00

Provider Fee Schedule

Individualized Services

Individualized 1:1 Pre-Employment Transition Services..... \$40.00/hour

Group Services

Pre-Employment Transition Services delivered in a group setting.....\$24.00/hour

The rate is \$24/hour for each student.

The ratio of students to staff must not be greater than six students to one staff member.

All materials for the student to participate in the program must be included in the fee for service.

VRBS will pay for travel time if the student is over 30 miles (one way) from the service delivery hub where the primary provider office is located. Travel time will not be covered if services are provided within the 30-mile radius surrounding the hub.

Steps to Self-Advocacy

1. Accentuate the Positive

Respond to at least as many positives as negatives. Begin by assuming the best of others.

2. Do Your Homework and Document Everything

The first step in developing a position should always involve confirming your information. In addition, you should document everything you do as well as what others tell you-including phone calls, mail, meeting, etc. Documentation protects you from denials and countercharges.

3. Plan Many Small Successes

Successful efforts over time will build your competency and reputation.

4. Be Prepared

Be clear on your facts and do your homework/research. Highlight the general principals of what you are promoting-this helps prevent personality conflicts stemming from disagreements over details of solutions. Once you have begun to address as issue, be prepared to follow through. Also, be prepared to try more than approach.

5. Be Reasonable

Cooperation and compromise must be addressed in resolving any issue. Listen to what others have to say when making your own decisions. Prepare to accept success.

6. Take Responsibility

Participate in your won meetings-do not rely on others to make your decisions for you. Actively participate in discussions, decisions, meetings. Take an active interest in what is happening around you.

Advocate for you own proposals and ideas, but also be open to alternatives, compromises and ideas offered by other's. Seek out others who have knowledge of the workings of systems you may not understand, which might lead to greater success. Remember that a mutually acceptable solution to a problem is a success for everyone.

Student's Quarterly Report for Pre-Employment Transition Services

Student's Name	Student's School ID Number	Student's SS#	Student's Original Pre-ETS Start Date

Pre-Employment Transition Services

	1. Job exploration counseling	2. Work-based learning	3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary education	4. Workplace readiness	5. Instruction in self-advocacy
Record 1 if service was provided directly by VRBS staff					
Comparable Benefits: Record up to 3 codes (separate # with ;)					

Describe the Pre-Employment Transition Services that were provided by the counselor or through Comparable Benefits in the Pre-ETS Case Notes. Include specific activities, dates and outcomes.

Counselor Name

Quarter End Date (9-30, 12-31, 3-31, or 6-30)

COMPARABLE SERVICES AND BENEFITS PROVIDERS

Code/Comparable Services and Benefits Provider Type

- 1 Adult education and Literacy program administered by the Department of Education
- 2 Adult, Dislocated Worker and Youth program administered by Department of Labor (DOL)
- 3 American Indian VR Services Program
- 4 Public Centers for Independent Living
- 5 Child Protective Service
- 6 Public Rehabilitation Program
- 7 Employer Provided Benefits
- 8 Public Educational Institution (elementary/secondary)
- 9 Public Educational Institution (postsecondary)
- 10 Public Employment Network (not otherwise listed)
- 11 Federal Student Aid (e.g., Pell grants, Supplemental Educational Opportunity Grant, work study, etc.)
- 12 Intellectual and Developmental Disabilities Agency (Public)
- 13 Medical Health Provider (Public)
- 14 Mental Health Provider (Public)
- 15 One-stop Partner (not listed separately)
- 16 Public Housing Authority
- 17 Social Security Administration (Disability Determination Service or District office)
- 18 State Department of Correction/Juvenile Justice
- 19 State Employment Service Agency
- 20 Veteran's Benefits Administration (which includes VA Vocational Rehabilitation)
- 21 Veteran's Health Administration
- 22 Wagner-Peyser Employment Service Program
- 23 Welfare Agency (State or local government)
- 24 Other

Request Form for Pre-Employment Transition Services Montana Vocational Rehabilitation and Blind Services

Student Name: _____ Student's Date of Birth: _____

Address: _____ Phone number: _____

Social Security Number: _____ School ID Number: _____

Student's Race: American Indian Asian Black Native Hawaiian White

Student's Ethnicity: Hispanic or Latino Not Hispanic or Latino

Student's Disability Status: 504 Accommodation IEP Has a Disability (No 504 or IEP)

Primary Disability: _____

School Name:

School Contact:

Student's Grade Level:

Student's Expected Graduation Date:

Pre-Employment Transition Services Requested: (See Definitions and Check all that apply)

- Job Exploration Counseling
- Work Based Learning
- Counseling on comprehensive transition or postsecondary educational programs
- Workplace readiness training
- Instruction in self-advocacy

By signing this form, I am requesting Pre-Employment Transition Services. I understand that if I wish to apply for vocational rehabilitation services, I may do so at any time. For the specific purpose of participation in Pre-Employment Transition Services, I grant permission for Vocational Rehabilitation and Blind Services (VRBS) to exchange information with my school and service providers. I understand that VRBS requests my Social Security Number for federal reporting purposes. All information will be kept in the strictest confidence and used solely for program purposes. Information that I have provided is to the best of my knowledge true, correct and complete.

Signature of Student

Date

Signature of Student's Parent or Legal Guardian
(if student is under 18)

Date

Request Form for Pre-Employment Transition Services Montana Vocational Rehabilitation and Blind Services

Student with a Disability Verification

Definition:

A student with a disability is an individual with a disability in a secondary, postsecondary, or other recognized education program who is not younger than 14 and not older than 21. The student is eligible for, and receiving, special education or related services under Part B of the Individuals with Disabilities Education Act (20 U.S.C. 1411 et seq.); or is an individual with a disability, for purposes of section 504; or is an individual with a disability who is not receiving a 504 accommodation or services under an Individualized Education Program (IEP).

If this request form is being completed by school personnel, please verify the following:

By signing this form, I verify that this individual meets the definition of a student with a disability and there is available documentation supporting that the student is:

- A student with a disability for the purposes of section 504; or
- A student with a disability and is receiving transition services under an Individualized Education Program (IEP); or
- A student with a documented disability who is not receiving a 504 accommodation or services under an Individualized Education Program (IEP).

School Personnel Name: _____ / _____ Date: _____
(Printed) (Signature)

If this request form is being completed by non-school personnel, one of the following supporting documents must be included with the submitted request form:

- Copy of Individualized Education Program (IEP) or 504 Accommodation
- School records/statement from school personnel
- Proof of receipt of SSI/SSDI benefits based on individual's own disability
- Medical or psychological documentation signed by a licensed professional

VRBS Office Use Only:

- Required verification has been reviewed and individual is confirmed to be a student with a disability
- The student has reviewed information about the available Pre-ETS and requested specific services.
- VRBS is in agreement that the requested Pre-Employment Transition Services are appropriate and necessary for the student to prepare for life after high school.

VRBS Staff Name: _____ / _____ Date: _____
(Printed) (Signature)

Please submit this completed form and supporting documentation (if applicable) to your local VRBS Office.

Pre-Employment Transition Services

- 1. Job Exploration Counseling** - Job Exploration Counseling is meant to provide students with a variety of opportunities to gain information about careers, the skills needed for different jobs and to uncover personal career interests. If provided as pre-employment transition services, job exploration counseling may be provided in a group setting or on an individual basis, and may include information regarding in-demand industry sectors and occupations, as well as non-traditional employment, labor market composition and vocational interest inventories to assist with the identification of career pathways of interest to the students
- 2. Work based learning** - Work Based Learning (WBL) is an educational approach or instructional method that uses community workplaces to provide students with the knowledge and skills that will help them connect school experiences to real-life work activities and future career opportunities. WBL may include in-school or after-school opportunities, experiences outside the traditional school setting, and/or internships. When paid WBL experiences are provided, the wages are to be paid at no less than minimum wage.
- 3. Counseling on opportunities for enrollment in comprehensive transition or post-secondary education programs at institutions of higher education** - information and guidance on a variety of post-secondary education and training opportunities. These services may include information on course offerings, career options, types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with a career field or pathways. It may also include advising students and family members on academic curricula, college application and admissions processes, completing the Free Application for Federal Student Aid (FAFSA), and resources that may be used to support individual student success in education and training, to include disability support services.
- 4. Workplace readiness training to develop social skills and independent living** - Workplace readiness traits describe a number of skills that employers expect from most employees. Workplace readiness skills are a set of skills and behaviors that are necessary for any job, such as how to interact with supervisors and co-workers and the importance of timeliness. These skills are sometimes called soft skills, employability skills, or job preparation skills. These skills help students learn and build an understanding of how we are perceived by others.
- 5. Self-advocacy skills** – includes an individual’s ability to effectively communicate, convey, negotiate or assert his/her own interests and/or desires; develop self-determination; enable students to advocate for any support services, including auxiliary aids, services, and accommodations that may be necessary for training or employment.
 - Knowledge of self
 - Knowledge of rights and responsibilities
 - Communication skills
 - Leadership skills

Request Form for Pre-Employment Transition Services Instructions

- 1) The Request Form is needed for each student with a disability who will be receiving Pre-Employment Transition Services (Pre-ETS). It needs to be completed and sent to VRBS prior to the student beginning to receive Pre-Employment Transition Services.

- 2) The Social Security Number and Student ID Number are now required.

- 3) The student will review the Pre-ETS definitions and check all of the services that he or she is requesting.

- 4) The student may request all of the services, but there is no requirement for the school to provide a specific service or all five of the Pre-Employment Transition Services.

- 5) If a student does not request a specific Pre-ETS Service, the quarterly report and billing invoice cannot include the service that was not requested.

- 6) The form requires a student signature, or a parent signature if the student is under 18.

- 7) School staff can sign the form verifying that the student meets the definition of a student with a disability. No further documentation needs to be sent with the form. VRBS staff may request to view the school's documentation supporting that the student has a disability.

- 8) If the form is not signed by school personnel, supporting documentation will need to be submitted with the form.

- 9) The completed Request Form will be sent to the local VRBS Office. (Office addresses and Fax numbers are included on Attachment N.)

- 10) The Request Form will be reviewed by VRBS Staff to verify that the individual is a student with a disability and VRBS is in agreement with the requested Pre-Employment Transition Services.

- 11) Approval will be communicated to the school by VRBS sending a copy of the Request Form with VRBS Staff signature to the School Liaison.



Steve Bullock, Governor

Sheila Hogan, Director

Dear Parent or Guardian:

This letter is to let you know that your student may qualify to receive Pre-Employment Transition Services through Vocational Rehabilitation. Our agency is partnering with local high schools to offer this special set of services to students with an IEP, 504 or other documented disability.

These services can help your student...

- Explore their interests and choose a career!
- Try out real jobs in the community!
- Visit businesses to see people at work and learn more about available jobs!
- Understand how to apply for college, apprenticeships, and financial aid!
- Discover what it takes to become a valuable employee!
- Develop independent living skills and learn how to advocate for themselves!

If you would like your student to receive any of these services, please complete and sign the attached Request Form. It is important that you fill out all of the blanks on this form and return it to your high school. We ask that you review the list of potential Pre-Employment Transition Services on the form and select the options that you and your child determine would help them to better prepare for life after high school. It is okay to check one or all of the boxes. If you are not sure, go ahead and check them all.

We are happy to answer any additional questions or speak with you more regarding this FREE opportunity for your child to receive Pre-Employment Transition Services! Please do not hesitate to contact me or the Supervisor in your local Vocational Rehabilitation Office if you have any questions or concerns.

Sincerely,

Tammy Hogan, M. Ed., C.R.C.
Youth Services Specialist
(406) 454-6060



Department of Public Health and Human Services

Missoula Office ♦ 2675 Palmer St. Ste A ♦ Missoula, Montana 59808
(406) 329-5400 ♦ Fax: (406) 329-5420 www.dphhs.mt.gov

Steve Bullock, Governor

Sheila Hogan, Director

Dear Parent or Guardian:

This letter is to let you know that your student may qualify to receive Pre-Employment Transition Services through Vocational Rehabilitation. Our agency is partnering with Montana Youth Leadership Forum (MYLF) and Montana Youth Transitions (MYT) to offer this special set of services to students with an IEP, 504 or other documented disability.

These services can help your student...

- Explore their interests and choose a career!
- Try out real jobs in the community!
- Visit businesses to see people at work and learn more about available jobs!
- Understand how to apply for college, apprenticeships, and financial aid!
- Discover what it takes to become a valuable employee!
- Develop independent living skills and learn how to advocate for themselves!

If you would like your student to receive any of these services, please complete and sign the attached Request Form. It is important that you fill out all of the blanks on this form and return it to MYLF or MYT. We ask that you review the list of potential Pre-Employment Transition Services on the form and select the options that you and your child determine would help them to better prepare for life after high school. It is okay to check one or all of the boxes. If you are not sure, go ahead and check them all.

We are happy to answer any additional questions or speak with you more regarding this FREE opportunity for your child to receive Pre-Employment Transition Services! Please do not hesitate to contact me or the Supervisor in your local Vocational Rehabilitation Office if you have any questions or concerns.

Sincerely,

Tammy Hogan, M. Ed., C.R.C.
Youth Services Specialist
(406) 454-6060



Montana
Office of Public Instruction
Denise Juneau, State Superintendent

Office of Public Instruction
P.O. Box 202501
Helena, MT 59620-2501
406.444.3095
888.231.9393
406.444.0169 (TTY)
opi.mt.gov

MEMORANDUM

To: Interested Persons
From: Frank Podobnik
Date: August 17, 2016

Re: IDEA Maintenance of Effort (MOE) Requirements Related to Pre-ETS Expenditures

The Department of Public Health and Human Services is providing funding for Pre-Employment Transition Services. These funds are made available under the Workforce Innovation and Opportunity Act (WIOA). As such, these funds are federal funds and will not be included in the calculation of MOE or in determining the amount of local match funding a district must provide for special education.

Please remember, the Pre-Employment Transition Services funds are to be used to provide additional services to youth with disabilities, not to pay for the services required under the Individuals with Disabilities Education Act (IDEA).

Additional questions regarding the IDEA MOE requirements and special education funding can be directed to Dick Trerise at 406-444-4429 or dtrerise@mt.gov.



OFFICE OF PUBLIC INSTRUCTION

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HELENA MT 59620-2501
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(406) 444-3095
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(406) 444-0169 (TTY)

Denise Juneau
Superintendent

June 27, 2016

To: Superintendents, Business Managers/Clerks, County Treasurers and County Superintendents
From: Steve Hamel, Financial Specialist
Regarding: Accounting Guidance for the Pre-Employment Transition Services funding from the Montana Department of Public Health and Human Services

The Department of Public Health and Human Services is providing funding for Pre-Employment Transition Services. Below is guidance on where to deposit the monies along with revenue and program codes.

The revenue and expenditure codes for this grant are shown below:

Table with 3 columns: Revenue, Exp., Program. Row: Pre-Employment Transition Services, 4740, 474

Level/Fund:

- 215 - High School Misc Programs Fund (15)
215 - K-12 Misc Programs Fund (15)

Revenue Account Structure:

Table with 3 columns: Level/Fund, Revenue Source, Project Reporter. Row: _15, 4740, XXX (Assigned by District)

Expenditure Account Structure:

Table with 5 columns: Level/Fund, Program, Function, Object, Project Reporter. Row: _15, 474, XXXX, XXX, XXX (Assigned by District)

If you have program questions please contact Tammy Hogan at the Department of Health and Human Services at 406-444-6060 or thogan@mt.gov. For accounting questions please contact me at 406-444-0783 or shamel@mt.gov.

"It is the mission of the Office of Public Instruction to improve teaching and learning through communication, collaboration, advocacy, and accountability to those we serve."



Time Allocation Guide for Pre-Employment Transition Services

Staff time should only be counted when providing pre-employment transition services to students with disabilities. In Montana, the age range for a student with a disability is 14-21 years of age.

VR agencies are not permitted to pay any administrative costs, as defined in section 7(1) of the Rehabilitation Act and §361.5(c)(2)), such as the salaries for the VR counselor's clerical assistant or supervisor, with the funds reserved for the provision of pre-employment transition services. Staff time for the purposes of this guide pertain to those individuals employed by the VR agency who directly provide pre-employment transition services.

1. Direct Services/Required Activities:

a. The five "required" activities of pre-employment transition services are:

- Job exploration counseling;
- Work-based learning experiences, which may include in-school, after school, or community-based opportunities;
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at IHEs;
- Workplace readiness training to develop social skills and independent living; and
- Instruction in self-advocacy, including peer mentoring.

b. Tracking staff time for directly providing or arranging for the provision of one or more of the five required pre-employment transition services activities directly toward the required activities:

- Staff will document the time spent directly providing the required pre-employment transition service activities, but do not need to track time spent on each of the required activities. The specific pre-employment transition services the student receives would be tracked in the student's case record.
- This can include staff travel time.
- Staff may also document the time spent arranging for the provision of pre-employment transition services.
- This may include time spent working with the student and providers to identify and arrange the pre-employment transition service(s) that best meet the student's needs.

Example A: If the counselor is providing job exploration counseling off site from 1:00-2:00 pm and they left the VR office at 12:30 to travel to the site and returned at 2:30 from providing the service, then they would document 2 hours of staff time providing pre-employment transition services.

Note that if the counselor spent an additional hour meeting with this student or another to discuss any other service (other than pre-employment transition services), that additional time cannot be counted as pre-employment transition services time.

Example B: If the counselor spent an hour researching providers and coordinating availability of pre-employment transition services for the student, the counselor would then document 1 hour of staff time arranging for the provision of pre-employment transition services.

2. Coordination Activities:

a. Pre-employment transition coordination consists of:

- Attending individualized education program meetings for students with disabilities, when invited;
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
- Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
- When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

b. Tracking staff time for coordination activities:

- Staff will document the time they spend conducting these four specific coordination activities.

Example: if the counselor attended four IEP meetings for students with disabilities from 9:00 am to 12 noon, the counselor could document 3 hours under pre-employment transition services as a coordination activity.

Note that if the counselor was at the high school until 1pm discussing other students receiving other additional VR services, they would not be able to charge that additional one hour to pre-employment transition services.



3. All Other Activities and Services Provided:

a. Note that the following are examples of activities that staff would not track their time as pre-employment transition services:

- Case management activities for all other VR services including transition services
- IPE development
- Providing or arranging other VR services such as:
 - Vocational guidance and counseling
 - Vocational training
 - Job development and placement services

Questions or inquiries on tracking staff time should be directed to Tammy Hogan at (406) 454-6069.

This guide was developed by the WINTAC, a project funded under # H264G15005 of the U.S. Department of Education (Department). The information contained in this document does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.