

Delaware Division for the Visually Impaired

Chapter 6 - Pre-ETS: Policies and Procedures

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Chapter 6: Pre-ETS

General Policy Overview

The Workforce Innovation and Opportunity Act (WIOA), signed into law in July 2014, amended the Rehabilitation Act and requires Vocational Rehabilitation (VR) agencies to reserve no less than 15% of their federal funds to provide Pre-ETS (Pre-ETS) to students with disabilities in need of such services who are eligible or potentially eligible for services.

Only students who meet the definition of a student with a disability as defined further in this document may receive Pre-ETS. Students with disabilities are not required to apply for vocational rehabilitation services in order to receive Pre-ETS. Pre-ETS must not be used as an assessment tool to determine eligibility for VR services or the necessity of additional vocational rehabilitation services or the potential for competitive integrated employment.

The purpose of Pre-ETS is to help students identify career interests, explore career options and provide them with opportunities to learn the skills that will prepare them for the transition to employment and/or post-secondary education. Services can be provided in a group or individualized setting and include 5 core services (required activities as described in 34 CFR 361.48(a)(2)), 4 coordination activities, and 9 authorized services, if funds remain after analysis utilizing the fiscal forecasting outlined in section 6.14.

The Division for the Visually Impaired (DVI) will make every effort to provide or coordinate Pre-ETS to ensure statewide availability. To that end, DVI will collaborate with state and local education agencies, community rehabilitation providers, institutions of higher education and other transition stakeholders across the state to ensure that the five required Pre-ETS services are available to students with disabilities who may need them.

DVI will work with stakeholders including students, families and state and local education agencies to provide information in regard to pre-employment transition services, identify the needs of students with disabilities and connect students to available services. Education agencies continue to be responsible for providing a free and appropriate public education to include transition services required under Individuals with Disabilities Education Act (IDEA).

6.1 Student with a Disability

A student with a disability must meet the following criteria in order to receive Pre-ETS:

Pre-ETS are provided to students with disabilities who are eligible for VR services or potentially eligible for VR services (i.e. students with disabilities who have not applied for or been found eligible for VR services).

A student with a disability must meet the following criteria in order to receive Pre-ETS:

1. The student is not younger than age 14 (or in 8th grade) through 21 (has not reached 22nd birthday by August 31) as defined under IDEA in Delaware.
2. The student has a disability that would make them eligible or potentially eligible for DVI's vocational rehabilitation services.
 - a. There must be documentation that indicates the individual has vision loss that would make them eligible or potentially eligible. The visual criteria that must be met is:
 - i. **Totally Blind:** No light perception.
 - ii. **Legally Blind:** 20/200 in the better eye with correction, or a field restriction of 20 degrees or less.
 - iii. **Severely Visually Impaired/Partially Sighted:** 20/70 to 20/200 in the better eye with correction.
3. The student is enrolled in an educational program.
 - a. Examples of educational programs include high school, home school, post-secondary education programs, GED programs, charter school, those offered through the juvenile justice system, or other programs considered educational in nature like state, national or industry recognized programs leading to a credential (e.g. CNA programs through Delaware Technical & Community College leading to industry-recognized credentials..
 - b. To be considered enrolled in a recognized post-secondary education program, there must be:
 - i. Documentation that the student graduated from secondary education;

- ii. Documentation of the student’s intention or confirmation that they had accepted the invitation to enter the post-secondary program, such as a class registration form; and
 - iii. Documentation that the student has been informed by the institution that they seat, or spot is being held for them, such as a letter of acceptance.
- c. Documentation of enrollment must be current and may include an IEP, 504 plan, report card, or college registration receipt indicating the student is qualified to receive the services.

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

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

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

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

6.2 Pre-ETS for Potentially Eligible Students

Students are not required to apply for vocational rehabilitation services in order to receive Pre-ETS. However, they must provide documentation to demonstrate they satisfy the definition of a student with a disability as described above which will include documentation of a vision loss and enrollment in an educational program prior to beginning those services. Documentation that can be used includes an eye report, a copy of their IEP, 504 plan, or other formal documentation.

If the student does not meet DVI’s eligibility criteria for vision loss, they are no longer considered potentially eligible and cannot receive any Pre-ETS or other vocational rehabilitation services from DVI. If a student has other disabilities, they may be eligible to receive services from the Division of Vocational Rehabilitation (DVR). These individuals must be referred to the Division of Developmental Disabilities Services (DDDS), and or the Division of Vocational Rehabilitation (DVR)

If a student requires additional vocational rehabilitation services outside of Pre-ETS, they must apply and receive an eligibility determination. Those additional services, as well as their Pre-ETS, are provided as part of an approved IPE.

Potentially eligible students are entered into VICR, the agency's case management system, and identified with a status 03 – Potentially Eligible.

Transition Counselor Process for potentially eligible students with disabilities:

The DVI Transition Counselor (TC) 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 DVI by either:

1. Coordinating TVI, LEA, student and parent/guardian contact with a TC during their IEP at 13 years of age to identify available services when they reach age 14.
2. Potentially eligible students may also be referred by their parents, TVIs and LEAs.

A Student Referral will be completed through DVIs case management system (VICR) or DVIs central intake process. The Student Referral will include the following information to establish eligibility:

1. Social Security number;
2. Date of Birth;
3. Race and ethnicity;
4. Disability;
5. Contact Information;
6. Grade Level and expected graduation date;
7. Description of each Pre-Employment Transition Service;
8. Specific Pre-Employment Transition Services requested by the student;
9. Parent/student consent.

Review and Approval

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

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

DVI TC will indicate whether they agree that the requested Pre-Employment Transition Services are appropriate and necessary for the student to prepare for life after high school.

If the DVI TC agrees, they will develop a plan to provide Pre-ETS services to the potentially eligible student.

Service Provision

Potentially eligible students can receive one or more Pre-Employment Transition Services depending on their need and interest. Additionally, potentially eligible students may utilize the auxiliary aids and services that are necessary for their participation in the five required Pre-ETS activities as referenced in section 6.7 Auxiliary Aids and Services. For potentially eligible students who will receive individual DVI Pre-ETS, the TC will take the following steps:

1. The DVI TC will create a special Pre-ETS hard file according to the DVI Casework Manual.
2. The potentially eligible student file will bear a visual identifier to help staff easily discern that the individual is receiving Pre-ETS.
3. The plan for the potentially eligible student will be generated in VICR and will identify Pre-ETS activities, progress, comparable benefits and TC's direct provision of Pre-ETS will be documented in the case notes.

Pre-ETS can be provided by an approved provider who has a contract to provide Pre-ETS with DVI.

If the student expresses interest in receiving specific Pre-ETS services, the TC will determine how and who can provide the services. The student and parent may exercise informed choice when multiple providers exist.

The TC creates a provider referral to include:

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

DVI TCs 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 DVI 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 TC 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 entered into VICR to populate the quarterly RSA-911 data report.

6.3 Pre-ETS for Eligible Students

A student who has been determined eligible and has an active IPE is able to receive Pre-ETS and any additional services they require to meet their identified employment goal.

Pre-ETS TC Process for Eligible individuals:

The Pre-ETS materials will be included in the Vocational Rehabilitation case file. The file will bear a visual identifier to help staff easily discern that the individual is receiving Pre-ETS. The Case notes referring to Pre-ETS will have a Pre-ETS heading. 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 DVI Casework Manual.

As with any eligible DVI 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.

The TC demonstrates that the student is achieving the DVI program's policies for academic standards by recording the most recent date of the individual's transcript or report card for secondary education in VICR. Supporting documentation can include a copy of a semester transcript or report card.

Pre-ETS can be provided through direct provision of services by a DVI TC, 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 TC will determine how and who can provide the services. The student and parent may exercise informed choice when multiple providers exist.

The TC creates a provider referral to include:

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

DVI TCs 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 DVI 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 TC 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 entered into VICR to populate the quarterly RSA-911 data report.

6.4 Five Required Core Services

The purpose of pre-employment transition services is to help students identify career interests, explore career options and provide them with opportunities to learn the skills that will prepare them for the transition to employment and/or post-secondary education. Services can be provided in a group or individualized setting and include 5 core services.

The five core pre-employment transition services and examples of each include:

1. **Job Exploration Counseling** is intended to foster motivation, consideration of opportunities, and informed decision-making. Job exploration counseling includes, but is not limited to:
 - a. vocational counseling and guidance;
 - b. review of information regarding high demand occupations and local labor market information;
 - c. identification of career pathways of interest to the student;
 - d. job shadowing and informational interviews;
 - e. career and interest inventories.

DVI staff will meet with students to discuss their vocational interests, abilities, capabilities, strengths, resources, priorities, and concerns so that services and activities are based on those discussions. DVI staff will also gather existing career assessments that have been completed by the IEP team and other sources so that the information can be incorporated into the student's IPE.

2. **Work-Based Learning Experiences** (WBLEs) are paid or unpaid work experiences in the community (to the maximum extent possible) that provide students with knowledge and skills that connect school experiences to real-life work activities and future career opportunities. All WBLEs must be in integrated settings. Paid work experiences must be compensated at the local minimum wage rate or higher. It is essential that direct employer or community involvement be a component of the WBLE to ensure in-depth student engagement. WBLEs include, but are not limited to:
 - a. informational interviews and researching local employers;
 - b. work-site tours for students to learn about necessary job skills;
 - c. job shadowing experiences;
 - d. connection to mentoring opportunities;
 - e. registered apprenticeships;
 - f. internships as part of a secondary or post-secondary training program;
 - g. short-term work experiences (up to 120 hours per experience);
 - h. volunteer opportunities.

DVI staff will ensure all students have opportunities to participate in short-term work experiences, internships, registered apprenticeships, and other types of short-term employment in coordination with

the IEP team's plan for experiential learning.

Short-term work experiences provided or paid for by DVI must not exceed 120 hours per experience. A student is not limited in the number of work experiences they can participate in, but each experience must be necessary and specific to the work-based learning needs of the student. If an eligible student with a disability needs a support service such as a job coach in order to participate in the short term WBLE, then that service may be provided and costs charged to the reserve so long as it is included in the IPE and documentation is in the case record to verify the service is necessary in order for the student to participate in the Pre-ETS service. However, if the student is permanently hired by the employer and requires additional supports (such as a job coach), DVI cannot use Pre-ETS funding for those supports or anything related to that job moving forward. Those supports will be paid from the basic 110 grant funds.

3. **Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at Institutions of Higher Education;** counseling on enrollment includes, but is not limited to:

- a. exploration of vocational and academic training required for successful employment;
- b. postsecondary awareness related to career fields and career pathways;
- c. advisement on course offerings, attending college fairs and tours, program application and admission processes;
- d. identification of resources that may be needed for student success in education (e.g. disability support services, supported education);
- e. learning about how to apply for college and completion of the Free Application for Federal Student Aid (FAFSA).

DVI staff will ensure students are provided information, counseling, and guidance on the options available for secondary transition and post-secondary programs at institutions of higher education.

4. **Workplace readiness training to develop social skills and independent living;** students will receive comprehensive workplace readiness training to improve and enhance their independent living and vocational skills, so they are prepared for eventual employment. Workplace readiness training includes training on commonly expected skills that employers seek, often referred to as "soft skills". Workplace readiness training includes, but is not limited to:

- a. training on communication, social and workplace etiquette, interpersonal skills, and problem solving;

- b. independent living and adjustment to blindness skills training;
 - c. training on job-seeking, interviewing, completing job applications, & applying for jobs;
 - d. financial literacy, benefits planning;
 - e. understanding employer expectations and soft skills;
 - f. on-site workplace readiness during a work-based learning experience.
5. **Instruction in self-advocacy, including peer mentoring;** instruction in self-advocacy refers to a student's ability to effectively communicate, convey, negotiate, and assert their own interests and needs. These skills enable the student to advocate for support services and accommodations that may be necessary in training and employment. Instruction in self-advocacy includes, but is not limited to:
- a. training on disability disclosure;
 - b. learning how to request accommodations or supports;
 - c. peer mentoring;
 - d. participation in youth leadership activities;
 - e. instruction on disability rights, laws, and responsibilities;
 - f. attendance at self-advocacy workshops, seminars, or conferences.

Students will have access to instruction in self-advocacy through internal DVI staff, advocacy groups, and other external partners.

6.5 Four Coordination Activities

Coordination Activities involves working with LEAs, Workforce Boards, Employers and One-stop Centers.

1. Attendance at IEP meetings.
2. Developing work opportunities by working with local workforce development boards, one-stop centers and employers.
3. Coordination with schools to ensure the provision of Pre-ETS.
4. When invited, attend person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act.

6.6 Nine Authorized Services

Funds available and remaining after the provision of the required activities may be used to improve the transition of students with disabilities from secondary to post-secondary education or an employment outcome. DVI reviews expenditures on the five required Pre-ETS and associated staff salary dollars. Any funds remaining out of the 15% allotment is allocated towards authorized services.

DVI will make available the following authorized activities with the remaining funds:

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 post-secondary 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 IDEA;
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 multi state or regional partnerships;
9. disseminating information and strategies to improve the transition to post-secondary activities of individuals who are members of traditionally unserved and underserved populations.

6.7 Auxiliary Aids and Services

DVI will ensure no qualified student with a disability is denied pre-employment transition services based on 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 DVI 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 DVI's policies and procedures. Auxiliary aids and services include but are not limited to:

1. Qualified interpreters (including sign language);
2. Note-takers and readers;
3. Assistive living devices;
4. Videophones;
5. Audio recordings;
6. Braille materials and displays;
7. Screen reader software;
8. Magnification software;
9. Large print materials.

Auxiliary aids and services for Pre-Employment Transition Services do not include:

1. Personal devices (e.g. computers, laptops, tablets);
2. Prescribed devices (e.g. eyeglasses, hearing aids, wheelchairs);
3. Readers for personal use or study;
4. Home or vehicle modifications;
5. Attendant care or other ADL services required.

6.8 Technology (Temporary and Permanent Use)

Eligible Students:

Technology may be purchased for students with a disability that have been determined eligible when needed and identified on an approved IPE. It is reasonable that a student with a disability could need rehabilitation technology on a long-term or permanent basis, so they can access and participate in Pre-ETS. It is important to decide if the technology is only needed for access to Pre-ETS or if it will be used for other VR services. In the event the technology would be used for more than Pre-ETS, the TC will determine the proportion to charge to the reserve in consultation with their supervisor. The following technology may be purchased for a student for permanent use and are not required to be returned:

1. accessibility software and applications;

2. low vision aids and devices, including electronic magnifiers and CCTVs;
3. braille displays;
4. note-takers;
5. technology that has built in accessibility features, including iPads, iPhones, and Macintosh-based and Windows-based personal computers.

6.9 Allowable Pre-ETS Costs

Pre-ETS that fall under the five required services *may* be provided or purchased using Pre-ETS dollars under 34 CFR 361.48(a)(2). These include, but are not limited to:

1. disability-related skills training, including training in orientation and mobility, rehabilitation technology, and Braille (workplace readiness activities)
2. housing/lodging costs required for an eligible student with a disability, in accordance with an approved IPE, to participate in a Pre-ETS program
3. registration fees for conferences and workshops that align with Pre-ETS
 - a. Costs must be prorated if there are items on the agenda that are not specific to Pre-ETS
4. reimbursement to employer for costs incurred to provide a work-based learning experience, including a fee charged by the employer for a student's work uniform or equipment
5. short-term work experiences (no more than 120 hours per work experience)
6. stipends to students at a prevailing wage that are used towards allowable Pre-ETS, such as a work experience or self-advocacy workshop (as maintenance)
7. travel costs for staff incurred directly as a result of providing Pre-ETS, such as travel time and mileage for attending an IEP meeting
8. vocational counseling and guidance for an eligible student with a disability, in accordance with an approved IPE, that is aligned directly with the provision of one or more of the five required Pre-ETS services
9. staff/vendor time spent providing direct provision of Pre-ETS.

10. assessment services that an eligible student with a disability needs while engaging in any of the five required Pre-ETS services.
11. maintenance provided to an eligible student with a disability, in accordance with an approved IPE, for costs incurred in participating in Pre-ETS services (e.g., purchase of required clothing for a WBLE, or talking alarm clock to participate in workplace readiness training etc.). If a student is receiving other VR services and maintenance is provided to access those additional VR services, then maintenance costs must be prorated accordingly.
12. transportation costs to the extent that an eligible student with a disability needs transportation services in accordance with an approved IPE to participate in any of the required Pre-ETS services.
13. personal assistance services costs to the extent that an eligible student with a disability needs these services in accordance with their approved IPE to participate in any of the required Pre-ETS services.
14. rehabilitation technology - (consideration will be given regarding the use of the rehabilitation technology and if it will be used for purposes other than participation in Pre-ETS. In the event the rehabilitation technology will be used for purposes other than participation in Pre-ETS, the purchase price costs will be allocated accordingly).
15. family services- services to family members that are necessary in order to enable an eligible student with a disability to benefit from Pre-ETS services (e.g., parent needing transportation to accompany eligible student with a disability to her activity or appt, or a parent needed a language interpreter in order to understand consent forms).
16. coaching services provided to an eligible student with a disability participating in a WBLE in accordance with their IPE.
17. books, tools, and other training materials for eligible individuals in accordance with an approved IPE that are necessary for the student participation in their Pre-ETS service.

6.10 Precluded Pre-ETS Costs

There are several vocational rehabilitation services that cannot be provided or purchased using Pre-ETS dollars. Those services include:

1. Staff time spent doing administrative work, including time spent putting in authorizations for a student;

2. Job placement assistance;
3. Job search assistance;
4. Supported employment services;
5. Tuition, fees, and related costs associated with attending a post-secondary institution;
6. Work-based learning experiences located in a non-integrated setting, such as an enclave or sheltered workshop;
7. Work-based learning experiences longer than 120 hours in duration;
8. Work-based learning experiences paid at a subminimum wage level.

6.11 Outreach and Collaboration Responsibilities

DVI program administrators, district administrators, counselors, and DVI Teachers for the Visually Impaired (TVI) will develop and maintain collaborative relationships with state and local education agencies, including districts, charter schools, alternative school programs, and post-secondary education institutions, state agencies, workforce development partners and community rehabilitation agencies to coordinate pre-employment transition services. Coordination activities include:

1. Attending IEP meetings for students with disabilities, when invited. Attendance can be in person or by teleconference pending DVI staff availability and can be for both eligible and potentially eligible students.
2. Working with workforce development partners, DVI Business Consultants and employers to develop work opportunities for students with disabilities, including internships, apprenticeships, summer employment and other employment opportunities throughout the school year.
3. Work with local education agencies and other potential referral sources to coordinate and ensure the provision of pre-employment transition services.
4. Attend person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act, when invited.

6.12 Pre-ETS Referral and Eligibility

Referrals for pre-employment transition services can be made by the student, TVI, school, family, guardian or other caregiver and submitted to the DVI, typically through the Transition Counselor. DVI Transition Counselors will review the referral information to determine whether the student needs just Pre-ETS, or

if other VR services are needed or requested in order to determine whether the student needs to apply for and be determined eligible for VR services.

6.13 Visually Impaired Client Registry (VICR)

How PRE-ETS are managed in VICR:

1. **Status - 03** (Potentially Eligible Student) and **Status – 17** (Transition Student) consumers in VICR are eligible to receive PRE-ETS.
2. PRE-ETS services are managed in VICR through the method, contact and requisition sections within the consumer case.
3. When creating requisitions for Pre-ETS in VICR, the ID# is coded with the applicable Pre-ETS service.
4. Counselors track their time and PRE-ETS service delivered using the contact section in case notes. The contact section has drop down menus with times and services for the counselor to select.

6.14 Fiscal Forecasting of Pre-ETS

Fiscal Forecasting is the process for determining the amount of reserved funds DVI can move from the 5 required core Pre-ETS services to the 9 authorized Pre-ETS services. DVI will use the following process for Fiscal Forecasting to determine if funds are available for 9 authorized Pre-ETS activities:

1. Determine the number of potentially eligible students. The total number of students with disabilities age 14-21 (PES). This number is identified through the Education unit and depicts the total number of eligible students in this age range who are blind or visually impaired in Delaware at the beginning of the Federal Fiscal Year (FFY). Additionally, the Education unit will identify eligible students who are 13 whom we can anticipate may need Pre-ETS services in the next year.
2. Validate the 5 required core services have been made available to all eligible students pursuant IPEs from the existing VR caseload. The Visually Impaired Client Registry (VICR) case management system will be documented with the services eligible students received.
 - a. DVI shall assure the five required core Pre-ETS services are available to be provided to all students with disabilities who are blind or visually impaired through the following mechanisms:

- i. DVI is uniquely positioned to ensure that all eligible students are identified to make available the 5 required core services they may need. In addition to the VR unit, DVI also houses the Educational unit with Teachers of the Visually Impaired (TVI) who provide instruction and consultation services to all students with disabilities who are blind and visually impaired for the State of Delaware. This enables DVI to have a direct link to these students who may need pre-employment transition services. The TVI, in collaboration with the Local Education Agency (LEA), will identify eligible students to DVI VR. This may be a direct referral, or through consultation.
 - ii. DVI has 2 transition counselors covering the state to provide Pre-ETS to all eligible students.
 - iii. DVI contracts with statewide vendors serving every county in Delaware. Additionally, DVI works with Learning Ally to provide Pre-ETS in post-secondary education.
- 3. Identify the targeted amount of reserve funds necessary to provide Pre-ETS by determining the following:
 - a. Identify the number of eligible students currently receiving Pre-ETS.
 - i. X is the number of eligible students currently receiving services through VR. These students received at least 1 Pre-ETS service in the previous FFY.
 - b. Determine average cost per student (Z).
 - i. Y is the amount of funds DVI expended in the most recent FFY for the 5 required core Pre-ETS services. Additionally, DVI projects that the 2 transition counselors tracking their time for the 5 required core and 4 coordination activities there will create an additional reserve expenditure of (XXXX) per FFY.
 - ii. The average cost per student from the previous FFY is (Y divided by X).
 - iii. Take the average cost per student times the total number of students eligible to be served.
 - c. Determine available reserve funds for use on authorized activities by using the total amount of the Pre-ETS 15% reserved funds for the FFY subtracting out staff salaries and the cost to provide the five required to all eligible students. This is the amount available to spend on the 9 authorized services.

4. No less than quarterly, the VR Administrator and the Fiscal officer and/or delegates will review the number of students being served, the amount of reserve funds expended for required and coordination activities and will make adjustments to the forecast to ensure that sufficient funds are continuing to be reserved to ensure that all eligible students who are blind and visually impaired in need of Pre-ETS services may receive them. Documentation will be maintained in accordance with DVI's administrative processes and procedures.

6.15 Financial Responsibility for Pre-ETS

Financial need is not considered in order for a potentially eligible student with a disability to participate in pre-employment transition services or receive reasonable accommodations if required in order for them to participate in those services.

Financial need is not considered for pre-employment transition service or required accommodations or aids when listed on an approved IPE. However, DVI's financial eligibility does apply to other services on the IPE.

6.16 Procedures for Pre-ETS Tracking and Accounting of Funds

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.

Pre-ETS are to be paid for only with funds from the Federal Vocational Rehabilitation State Grant. Pre-ETS should not be paid for using State funds or any other federal or third-party grant.

When an expense is to be charged to Pre-ETS, the expense shall be verified by the DVI VR District Administrator (VRDA), and then submitted with supporting documentation to the Fiscal department for processing utilizing both VCR and the dvipurchasefiscal@delaware.gov mailbox.

The following guidelines are to be used when processing expenditures so that Pre-ETS service can be properly tracked:

1. If the expense is on an authorization created in the VICR system, the authorization should use one of the expenditure codes reserved for Pre-ETS. The list of eligible Pre-ETS codes is subject to revision at any time.
2. If the expense is in the form of an invoice to be paid outside of the VICR system, the Fiscal department will use account code 60013 when entering the invoice that has been submitted by

the DVI VRDA. Account code 60013 has been established in the Delaware statewide accounting system (First State Financials) specifically for Pre-ETS services.

3. DVI VRDA and fiscal staff will audit expenses from the Fiscal Monthly Reports.

Original authorizations and invoices are preferred, but copies and faxes are acceptable as long as they are legible and have not been altered.

The same general accounting policies and principles will apply to both Pre-ETS and non-Pre-ETS expenditures.

In accordance with the State of Delaware, Office of Management and Budget (OMB), Budget and Accounting Policy, Chapter 6, Section 6.5 Approval Thresholds, any single expenditure over \$5,000.00 requires approval from the Division of Accounting.

6.17 Procedures for Pre-ETS Time Certification

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.

Every employee of DVI that spends time on Pre-ETS activities is required to complete Pre-ETS monthly time trackers (Appendix A) detailing the number of hours that is spent on the five required Pre-ETS activities, the 4 coordination activities, and when applicable, the 9 authorized activities. Pre-ETS monthly time trackers detail how much time is spent on each of the activities:

Five required activities:

1. Job Exploration Counseling;
2. Work-Based Learning Experiences;
3. Instruction in Self-Advocacy;
4. Workplace Readiness Training;
5. Counseling Related to Comprehensive Transition or Postsecondary Education.

Four coordination activities:

1. Attending individualized education program meetings for students with disabilities, when invited;
2. Working with 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 when available through the school year, and apprenticeships;
3. Working with schools, including those carrying out activities under section 614(d) of IDEA, to coordinate and ensure the provision of Pre-ETS services;
4. When invited, attending person-centered planning meetings.

Nine authorized activities:

1. Implement effective strategies that increase independent living and inclusion in their communities and competitive integrated workplaces;
2. Develop and improve strategies for individuals with intellectual and significant disabilities to live independently, participate in postsecondary education experiences, and obtain and retain competitive integrated employment;
3. Provide training to vocational rehabilitation counselors, school transition staff, and others supporting students with disabilities;
4. Disseminate information on innovative, effective, and efficient approaches to implement pre-employment transition services;
5. Coordinate activities with transition services provided by local educational agencies under IDEA;
6. Apply evidence-based findings to improve policy, procedure, practice, and the preparation of personnel;
7. Develop model transition demonstration projects;
8. Establish or support multistate or regional partnerships that involve States, local educational agencies, designated State units, developmental disability agencies, private businesses, or others;
9. Disseminate information and strategies to improve the transition to postsecondary activities of those who are traditionally unserved.

All Pre-ETS monthly time trackers must be signed by the employee and the employee's direct supervisor, and then sent to the DVI Fiscal.

The Fiscal section shall be responsible for the maintenance and audit of Pre-ETS time certifications.

6.18 Appeals and the Client Assistance Program (CAP)

Students receiving Pre-ETS, regardless of application status, must be provided their appeal rights and information on the CAP anytime there is dissatisfaction with a determination made by DVI staff that affects the provision of their services. [Delaware Client Assistance Program Information.](#)

6.19 Discontinuation of Pre-ETS Services

Pre-ETS are discontinued:

1. The individual no longer meets the definition of a student with a disability due to:
 - a. their age (The individual with a disability is over the age of 21. If the individual is in school, the services may continue for the remainder of the academic year.) or
 - b. they are no longer enrolled in a recognized education program and are no longer reported as a student with a disability.

Approved: 5/11/2020
Reviewed:
Revised: