

# Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document



## **Policy Name: Pre-Employment Transition and Transition Services for Students with Disabilities**

Effective Date: 8/1/2026

Revision Date:

Retirement Date:

Review Schedule: Annual

Revision Number:

### **1.0 POLICY STATEMENT**

This policy establishes a uniform standard for the provision of Pre-Employment Transition Services at the Idaho Division of Vocational Rehabilitation (IDVR), ensuring full compliance with 34 CFR 361.48(a) (Pre-Employment Transition Services) and 2 CFR 200 (Uniform Grant Guidance).

### **2.0 LEGAL AUTHORITY**

**Federal VR Regulations:** 34 CFR 361.48(a)

**Uniform Guidance:** 2 CFR 200.403-405

### **3.0 SCOPE/APPLICABILITY**

The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA) emphasizes the provision of services to students and youth with disabilities to ensure they have meaningful opportunities to prepare for and achieve employment outcomes in a competitive integrated setting. The Rehabilitation Act, as amended by WIOA requires IDVR to reserve and expend a minimum of 15% of their Federal funding solely for the provision of Pre-ETS to students with disabilities. All IDVR employees are required to adhere to this policy as it applies to their job duties.

### **4.0 DEFINITIONS**

**Student with Disability:** The definition for student with a disability has three components:

1. Age Requirements: The minimum age of a student with a disability who can receive Pre-Employment Transition Services (Pre-ETS) in Idaho is 14, and the maximum age is not older than 21;
2. Enrolled in a secondary, post-secondary, or other recognized education program; and
3. Disability: The student is eligible for and receiving special education or related services under IDEA (Individuals with Disabilities Education Act); or is a student who is an individual with a disability for purposes of Section 504 of

# Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document



the Act. Students with disabilities are NOT required to be receiving services under Section 504.

**Potentially Eligible Student:** A potentially eligible student with a disability is defined as a student with a disability who has not yet applied for or been determined eligible for the VR program. Any student with a disability may receive Pre-ETS by making a request, completed by the student/family and a VR team member, using the Request for Pre-Employment Transition Services form.

**Transition Services:** Transition services are available to both students and youth with disabilities who are eligible for VR services and have an individualized plan for employment (IPE). They are a coordinated set of activities that are outcome oriented and promote movement from school to post-secondary education or employment. Transition services are based upon the student or youth's needs, including preferences and interests that promote the achievement of the employment outcome, as identified in the individualized plan for employment. Transition Services also include outreach to and engagement of parents or representatives, as appropriate.

**Youth with Disability:** A youth with a disability is an individual with a disability between the ages of 14 and 24. There is no requirement that they participate in an education program.

1. **Note:** Only individuals who meet the definition of a student with a disability may receive Pre-ETS. A Youth with a disability may receive other VR and transition services as a VR eligible individual with an approved IPE.

**Pre-Employment Transition Services for students:** There are five required pre-employment transition services which are delivered directly to students with disabilities who may need them and can be provided in a group or on an individual basis. The five required Pre-Employment Transition Services may be provided individually or in a group setting and include:

1. Instruction in Self-Advocacy
2. Job Exploration Counseling
3. Workplace Readiness Training
4. Counseling on Opportunities for Enrollment in Comprehensive Transition and Postsecondary Educational Programs at Institutions of Higher Education
5. Work-Based Learning Experience

# Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document



## **5.0 STANDARD**

Pre-employment transition services must be made available Statewide and provided or arranged for all students with disabilities, as defined in 361.5(c)(51) who may need these services, regardless of whether the student has applied or been determined eligible for VR services. Potentially eligible students can apply for VR services at any time and eligibility will be determined within 60 days from the date of application, unless an extension is agreed upon.

5.1 Pre-Employment Transition Services are provided to individuals who:

- 5.1.1 Meet the definition of a student with a disability; and
- 5.1.2 Are eligible or potentially eligible for IDVR services.

5.2 Verification of Disability: Prior to approving or providing any service, the IDVR designated team member must verify and document that the individual is a student with a disability. Verification can be done in one of three ways:

- 5.2.1 Case note documenting team member observation, review of school records, statements of education staff;
- 5.2.2 Referral form for pre-employment transition services with the identification of a student's disability, signed by school staff and parent/guardian if the student is under the age of majority in a State (parental consent to participate in pre-employment transition services is governed by State law, as well as policies of the educational programs and the DSU); or
- 5.2.3 Copy of an individualized education program (IEP) document, SSA beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination or documentation relating to 504 accommodation(s).

## **6.0 Process for Potentially Eligible and/or Eligible Students with disabilities with an approved IPE to Receive Pre-Employment Transition Services:**

Pre-ETS can be provided to potentially eligible students using a Pre-Case or adding Pre-ETS to a participant's plan through developing IPE:

6.1 Pre-Case Process: IDVR will receive a Request for Pre-Employment Transition Services. Services will be provided through either staff-provided or purchased services. IDVR is responsible for:

- 6.1.1 Verifying the individual requesting the services meets the definition of a student with a disability and
- 6.1.2 Documenting the need and approval for Pre-Employment Transition Services.
  - 6.1.2.1 IDVR will provide information on the difference between Pre-Case and VR case types and service provision on each

# **Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document**



6.2 Eligible with an approved IPE Process: IDVR will complete plan development with student and/or guardian to demonstrate the need and approval for Pre-Employment Transition Services. Services will be provided through either staff-provided or purchased services.

## **7.0 Auxiliary Aids or Services:**

If a student with a sensory or communicative impairment, including a potentially eligible student, requires auxiliary aids or services to access or participate in any required pre-employment transition services, VR may provide or pay for the service, if not customarily provided by another entity, including local educational agencies.

Auxiliary aids or services include:

- 7.1 Qualified interpreter on-site or through Video Remote Interpreting (VRI) services; note takers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; telephones compatible with hearing aids, closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTY), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to individuals who are deaf, hard of hearing or deaf-blind.
- 7.2 Qualified readers; taped texts; audio recordings; Braille materials and displays; screen reader software; magnification software; optical readers; secondary auditory programs (SAP); large print materials; accessible electronic and information technology; or other effective methods of making visually delivered materials available to individuals who are blind or have low vision.

## **8.0 Pre-Employment Transition Services Exempt from Financial Participation Agreement:**

Any service or good requiring IDVR funding must be authorized in writing before purchase. IDVR will not reimburse any entity or individual for services or goods procured without a written authorization and an approved IPE. Students in receipt of Pre-ETS, regardless of whether they have applied or been determined eligible for VR services, are exempt from a financial needs assessment and individual financial participation for Pre-ETS. However, eligible individuals would not be exempted from a financial needs assessment or financial participation policies when they are receiving other VR services including those that are needed to participate in pre-employment transition services under an IPE, such as transportation or language translation.

# Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document



services. See IDVR FPA Policy for more information on financial participation, including those services that are exempt as well as the exemption of individuals receiving benefits through titles II or XVI of the Social Security Act.

## **9.0 Additional IDVR Services for Students with Disabilities who have applied for and been determined eligible for VR services and have an approved IPE:**

In accordance with the Federal Register Final Notice of Interpretation (NOI), 15% reserved funds may be used for costs associated with providing certain IDVR services to eligible students with disabilities, in accordance with approved IPEs, who need those services to benefit from Pre-ETS.

9.1 Those additional VR services provided to VR eligible students under an IPE include the following:

- 9.1.1 Assessment Services;
- 9.1.2 VR Counseling and Guidance
- 9.1.3 Information and Referral Services;
- 9.1.4 Maintenance;
- 9.1.5 Transportation;
- 9.1.6 Personal Assistance Services;
- 9.1.7 Rehabilitation and Assistive Technology
- 9.1.8 Family Services; and
- 9.1.9 Coaching Services

9.2 IPE Development:

9.2.1 For those students who have applied for and been determined eligible for the VR program, The development and approval of an Individualized Plan for Employment (IPE) for students with disabilities must be developed, agreed to and signed by the student, or the student's guardian, and the QRP, as early as possible in the transition process, within 90 days from eligibility and no later than the time the student leaves the school setting, whichever is earlier.

9.2.2 An IPE for a student with a disability is developed in consideration of the student's IEP or 504 services. The IPE must list all the services the individual needs including any of the five required pre-employment transition services, in order to meet their employment goal.

9.2.3 For students or youth with disabilities, the IPE may include a projected post-school employment outcome, rather than a specific employment goal. The IPE with a projected post-school employment outcome, should outline the services and activities that will guide the participant's career exploration. The projected post-school employment outcome facilitates the participant's exploration and identification of a vocational goal based

# Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document



upon informed choice. The projected goal may be amended during the career development process, and eventually it must be revised to a specific vocational goal once an employment goal is identified and this process is completed.

## **10.0 Service Provision and Collaboration with Schools:**

IDVR works collaboratively with the State Department of Education (SDE), Local Education Agencies (LEAs), and local school personnel to develop effective referral and outreach strategies to maximize opportunities for students with disabilities to participate in Pre-ETS activities, including students who are receiving accommodations under IDEA, or is a student who is an individual with a disability for purposes of Section 504.

10.1 When invited, VR staff may attend Individualized Education Program (IEP) meetings or other school related meetings in person, by video conference or teleconferencing.

The SDE and IDVR have developed a comprehensive formal interagency agreement which addresses collaborative service provision, consultation and technical assistance, including the programmatic and fiscal responsibilities for each agency, as well as the documentation requirements with regard to students with disabilities who are seeking subminimum wage employment.

10.2 Specific criteria are used to determine which agency (IDVR or LEA) has the primary responsibility for providing and paying for transition-related services for students with disabilities. These criteria are based on several factors, including the purpose of the service, which entity customarily provides the service, and program eligibility.

## **11.0 Pre-Employment Transition Services under an Order of Selection:**

While IDVR is in an active Order of Selection (OOS), students who apply and are determined eligible for VR services shall be assigned to an OOS Disability Priority category and may be placed on a waitlist if their disability priority category is closed. An active OOS means that the agency is not able to serve all eligible individuals and at least one disability priority category is closed.

These students may continue to participate in any of the five required Pre-ETS while on the wait list so long as they have begun to receive at least one Pre-ETS prior to their eligibility determination and assignment to a closed category.

Eligible students assigned to a closed OOS category and placed on the waitlist for VR services before receiving at least one of the five required Pre-ETS may not receive

# **Idaho Division of Vocational Rehabilitation Pre-Employment Transition and Transition Services for Students with Disabilities Policy Document**



any Pre-ETS or VR services until their disability priority category is open and they are removed from the waitlist and an individualized plan for employment can be developed and approved.

## **12.0 Discontinuation of Pre-Employment Transition Services:**

Pre-Employment Transition Services are discontinued for the following reasons:

12.1 The individual no longer meets the definition of a student with a disability due to one or both of the following:

12.1.1 The individual is over the age of 22; or

12.1.2 The individual is no longer enrolled in a recognized education program.