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Government of the District of Columbia
Department on Disability Services

STANDARD OPERATING PROTOCOL	
Subject: Pre-ETS Consent and Service Delivery	SOP Number: 2021-RSA-SOP-003
Responsible Program or Office: Rehabilitation Services Administration	Effective Date: July 3, 2023
	Number of Pages: 10
Cross References, Related Policies and Procedures, and Related Documents: Pre-ETS Policy, Pre-ETS Consent and Service Delivery Form	

1. PURPOSE

This Standard Operating Protocol (SOP) provides guidance to the District of Columbia Department on Disability Services (DDS) and Rehabilitation Services Administration (RSA) staff regarding the Pre-ETS Consent and Service Delivery Form with the goal of providing a seamless process for applying for Pre-ETS Services and/or VR Service in accordance with the [Pre-Employment Transition Policy](#).

2. RESPONSIBLE STAFF

Responsible staff includes Vocational Rehabilitation (VR) Specialists, Rehabilitation Assistants (RA), VR Supervisors, Community Liaison Specialists, and RSA Intake and Outreach Unit Staff.

3. PROTOCOLS

A. Referral

Referral Process for students seeking Pre-ETS:

The Pre-ETS consent form can be downloaded from the website but must be submitted to the rsa.transition@dc.gov or an electronic version can be obtained by the School point of contact (POC) or VR Specialist assigned to the school.



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1. The Pre-ETS consent form should be completed in its entirety including providing supporting documentation (IEP, Medical Evaluations etc.) and submitted to rsa.transition@dc.gov.
 - a. Pre-ETS consent forms for students under the age of 18 require parental consent and signature.
 - b. Adult students, who are age 18 or older, are required to sign the Pre-ETS consent form.
 - c. For students over 18 with legal guardianship¹, the legal guardian must sign the Pre-ETS consent form.
2. Once the completed Pre-ETS consent form is received by the Program Support Assistant, they are disseminated to the appropriate RA.
3. The RA will initiate the Pre-ETS case information form in the case management system by,
 - a. WIOA Student with a Disability
 - b. WIOA Race/Ethnicity
 - c. Pre-Employment Transition Services information, Start Date

Pre-ETS services can be accessed once the completed Pre-ETS consent form, or the RSA transition referral form are received.

4. The RA will upload the Pre-ETS consent form and supporting documentation into the case management system and assign the case to the VR specialist. The RA will notify the VR specialist of new case assignment.
5. The VR specialist will contact the student's family within 5 business days to provide an overview of Pre-ETS services. The overview will provide the student's family with information pertaining to Pre-ETS and programming.
6. Pre-ETS services will be initiated once the student and family decide through informed choice which of the five required pre-employment transition services the student would engage in. Once one or more of the following five Pre-ETS services

¹ Note that if a student with a disability over the age of 18 has a Supported Decision Maker (SDM), the student should complete the Supported Decision Maker Agreement form, available at: <https://dds.dc.gov/node/1353106>, according to the instructions set forth therein. The Student should also complete a release of information form to allow DDS/RSA to release information to the SDM. Both documents should be retained in the student's file. The SDM is not authorized to make decisions or sign for the student with a disability but is authorized to assist in making decisions. As such, a student with an SDM must sign the Pre-ETS consent form themselves.



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are selected, the VR specialist will authorize for Pre-ETS programming utilizing the students informed choice. The five Pre-ETS services include,

- a. Job exploration counseling
 - b. Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting and/or internships
 - c. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs
 - d. Workplace readiness training to develop social skills and independent living skills, and
 - e. Instruction in self-advocacy
7. The Pre-ETS case information form should be completed by the assigned VR specialist quarterly to capture the provision of Pre-ETS for potentially eligible or eligible students with disabilities. On the Pre-ETS case information form in the case management system, the “WIOA PETS Purchased and Provided Services for this Quarter” section must be completed by the VR Specialist to track the Pre-ETS when provided or purchased to ensure all Pre-ETS is captured the quarter.

Referral process for students seeking VR services:

If a student is eligible or potentially eligible and receiving Pre-ETS and decides to apply for VR services they should,

1. Complete the VR transition referral form which can be downloaded from the website but must be submitted to rsa.transition@dc.gov or a paper copy can be obtained by the School POC or VR Specialist assigned to the school.
2. The VR transition referral should be completed in its entirety and submitted to rsa.transition@dc.gov.
3. The VR transition referral for students under the age of 18 requires parental consent and signature.
4. Adult students, who are age 18 or older, are required to sign the VR transition referral form. For students 18 or older with a legal guardianship, the legal guardian must sign the VR transition referral.
5. Once the completed VR transition referral is received by the Program Support Assistant, the referral is disseminated to the appropriate RA.
6. The RA will upload all supporting documentation into the case management system and assign and notify the VR specialist.



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7. If a referral is not completed in its entirety, the following steps should be completed to retrieve the missing information:
 - a. If the referral is submitted via the assigned school POC, the VR specialist and/or RA will attempt to reach the school POC to inform of the reason(s) why the referral is incomplete.
 - b. If the referral is a self-referral the RA will attempt to reach the individual or parent/guardian to inform of the reason(s) why the referral is incomplete.

A. Case Record Documentation

1. Upon receipt of a request for Pre-ETS, VR staff shall determine if the person requesting services is:
 - a. A new Pre-ETS participant; or
 - b. Has an open VR case and is eligible for VR services.
2. If the person requesting Pre-ETS is a newly identified participant, VR staff shall:
 - a. Enter referral information into CMS Pre-ETS case information form. Information must include (at a minimum):
 - Student Name
 - Date of Birth
 - USI number
 - Age
 - Race
 - Ethnicity
 - Identification of the student's disability or involvement in an IEP or 504 plan.
 - b. Verify the person is a student that has an IEP, 504 Plan, or is potentially eligible with appropriate documentation.
 - c. Scan documentation verifying that the person is a student with a disability into CMS.
 - d. If the person requesting Pre-ETS has an open VR case, VR staff shall verify the person is a student and no further documentation is needed.
 - e. Students who are potentially eligible for VR services may access Pre-ETS prior to submitting an application to VR, and prior to VR eligibility determination. This type of service may begin upon student or guardian request or when there is a



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recommendation for a student to receive one or more Pre-ETS. Pre-ETS provided by DCRSA or a DCRSA provider may begin once the student has completed a Pre-ETS consent form and has provided DCRSA with their IEP, 504 plan, or other documentation of a disability. If services are purchased, DCRSA must authorize the required activities to be provided. The student may choose to apply for VR services to determine eligibility for a more comprehensive scope of individualized VR services.

- f. If a student applies for and is determined eligible for VR services and is assigned to a closed priority category under order of selection, the student with a disability may continue to receive pre-employment transition services, if any of the pre-employment transition services began prior to eligibility determination and placement in a closed order of selection priority category.
- g. If a student has been determined ineligible for VR services, they would no longer be able to receive pre-employment transition services because they are no longer potentially eligible.
- h. DCRSA will collaborate with LEAs to ensure that students who are identifiable to DCRSA, via name or USI number, and who are receiving Pre-ETS provided directly through their LEAs, meet the definition for students with disabilities, and documentation of their participation in Pre-ETS activities is provided to DCRSA for tracking purposes. DCRSA will only report services that are known to the agency and provided directly by LEAs, if such services are provided in collaboration with DCRSA. If known and reported, services can be captured that were provided by the LEA VR agency or purchased by the VR agency. All services provided to the student must be reported; however, only the Pre-ETS expenditures paid with federal VR funds may be reported against the reserve.

B. Documentation and Tracking of Pre-ETS

DCRSA shall use the following methods to document the provision of Pre-ETS:

1. The provider of the Pre-ETS is responsible for identifying and reporting student attendance, including which of the required activities are provided, per student. The



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VR specialist will document Pre-ETS sessions provided monthly by documenting the participating student's information and Pre-ETS service provided on the Pre-ETS Google Sheet. The VR specialist shall follow the steps provided on the [Pre-ETS Google Sheet data entry guide](#).

2. The DCRSA case information form is an electronic form used for reporting Pre-ETS services, including type of service, that have been delivered in-house or externally. It is completed by VR specialist to document the provision of Pre-ETS in the CMS in accordance with the steps outlined in the [Pre-ETS Case Information Form Process Guide](#).
3. Case notes are used to further document the provision of Pre-ETS within the student's case record for students who have completed a Pre-ETS consent form.
4. An agency combo code is used by VR staff to record their time and to differentiate between time spent on Pre-ETS activities and time spent on VR activities. The combo code is subject to change annually and the Budget Analyst shall notify staff via email if the combo code changes. The code for FY21 is 000131309. Pre-ETS or Pre-ETS coordination activities provided directly by VR staff shall be allocated as Pre-ETS staff time on the timecard via the agency combo code. The combo code is subject to change annually and the Budget Analyst shall notify staff via email if the combo code changes. The code for FY21 is 000131309. Examples of such activities may include time spent administering Pre-ETS; time spent planning a Pre-ETS event; time spent traveling to meet with students for the purpose of providing Pre-ETS; time spent attending a Pre-ETS-related training; or time spent attending IEP meetings and providing information about Pre-ETS. Other examples may include the provision or coordination of Pre-ETS through impromptu meetings; telephone conversations; or emails. When questioning whether an activity should be counted, the VR specialist should speak with the VR supervisor.
5. Authorizations issued by DCRSA VR specialists may be used as an additional means to verify the validity of an invoiced expenditure. All authorized Pre-ETS require an accompanying report to substantiate services delivered. All reports are approved by the VR Specialist and uploaded to the case management system.
6. Invoices issued by providers and or vendors under the designated Pre-ETS funding code will be accompanied by a service provision report. The service provision report will detail, at minimum, the date of service provision, type of Pre-ETS delivered, the



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- number of student attendees, and student name and/or USI number. The invoice submitted by Pre-ETS providers includes the line items for each student and service delivered with time spent captured in an hourly rate defined by the Human Care Agreement. The service provision report will be reviewed and approved by a VR specialist prior to the operations team issuing payment and will be used to document the provision of Pre-ETS. All Pre-ETS provided by DCRSA must be reported even after meeting the 15% reserved funds requirement.
7. Pre-ETS provided by agency providers are to be tracked on the DCRSA Pre-ETS spreadsheet by the provider, Pre-ETS case information form by VR staff, and through invoices and the required service provision reports submitted to DCRSA by the provider and payments issued to those providers by DCRSA. Additionally, Pre-ETS provided by agency providers involving identified participants will be documented via a case note by VR staff. Agency providers shall collect and provide DCRSA the required data for DCRSA data tracking purposes. This information is found on the DCRSA report submitted by the Pre-ETS provider to the VR Specialist. All agency providers must collaborate with DCRSA to collect and submit Pre-ETS consent forms prior to any service provided to eligible or potentially eligible students with disabilities. Pre-ETS consent forms must be provided to DCRSA. Data shall be provided to DCRSA within 10 business days of the completion of the Pre-ETS.
 8. Auxiliary Aides or Services required by a student to access or participate in Pre-ETS shall require the completion of a student pre-ETS consent form, AT referral form, and corresponding case note justification. The justification shall document that there is a need for the student to participate in Pre-ETS who requires such aid or service. An authorization shall be created by the VR specialist for the provision of the auxiliary aid or service. Finally, the purchase will be verified via report and/or invoice.
 9. DCRSA will collaborate with LEAs and agency providers to ensure that Pre-ETS facilitated by, or in cooperation with, DCRSA will be provided exclusively to eligible or potentially eligible students with disabilities where consent has been obtained; and that reserve funds are not used in activities provided to students without a documented disability. Students who have an Individualized Plan for Employment (IPE) shall have their Pre-ETS documented on the IPE. Students participating in any of the required Pre-ETS activities shall have each required activity documented as a service on the IPE, if the service is provided by an external provider for agency staff. The IPE does not need to include every occurrence of a Pre-ETS; rather the Pre-ETS



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is documented with a begin date of when the service was initially rendered and documented with an end date of when the student is no longer eligible for Pre-ETS.

C. Financial responsibility for Pre-ETS participation

1. The student with the disability who requests assistive technology including auxiliary aids and other services shall provide medical assessments/evaluations and/or an IEP that documents the need for the requested service.
2. Auxiliary aids and services (As defined in the Pre-ETS policy) needed by a student with a disability to access or participate in Pre-ETS constitute allowable Pre-ETS expenditures and, therefore, may be paid with reserved funds when no other public entity is required to provide such aid or service. If the student requires AT in order to access their educational services outlined in their IEP, the burden is on the LEA to provide the service.
3. When Pre-ETS auxiliary aids or services are included in the IPE, RSA's financial need policy regarding family contribution does not apply to the provision of those services. However, District regulation on consumer participation in the cost of services based on financial need shall apply to all other non-exempt services identified in the IPE including personal devices or services.
4. When a student requests participation in an independent program, DCRSA will review the program to ensure it meets the criteria for pre-employment transition services. If the independent program requires payment of tuition or fees outside of an established Human Care Agreement, DCRSA will work with its operations team to ensure that the independent program is available for authorization for the VR Specialist.
5. DCRSA shall assess a person's/family's cost participation when:
 - a. The student has been determined eligible for VR services; and,
 - b. Requests a pre-employment transition service that requires the payment of tuition or fees; and/or,
 - c. Has non-exempt VR services included on the IPE.

D. Closure/Discontinuation of Pre-ETS Service records

1. A Pre-ETS case shall be closed or services discontinued once a person no longer satisfies



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the definition of a student with a disability, regardless of whether those services were being provided consistent with an IPE. If the person has been determined eligible for VR services and has an IPE, the person may continue to receive VR (non-reserve) funded services comparable to the discontinued Pre-ETS in accordance with the approved IPE.

2. Pre-ETS shall be discontinued once a person is no longer eligible for Pre-ETS. Pre-ETS shall also be discontinued for persons who are eligible for Pre-ETS but choose to no longer participate in Pre-ETS. This choice to no longer participate in Pre-ETS shall be confirmed by the adult student and/or parent/guardian either verbally or in writing, regardless of whether those services were being provided consistent with an IPE.
3. At the time of the Pre-ETS case being closed or the Pre-ETS being discontinued, the DCRSA VR specialist should make every attempt to contact the student to notify them of pending case closure. The VR Specialist will generate the pending case closure letter and send to the adult student or parent/guardian of the student. The VR Specialist will notify the LEA point of contact about the pending case closure. The VR specialist will document this communication via case note titled “LEA Notification of Pending Case Closure” in the case management system.
4. Documentation of Pre-ETS closure or discontinuation of service shall be provided through the appropriate DCRSA case closure letter 30 days after the pending case closure letter and sent to the adult student or parent/guardian. DCRSA will attempt to contact the person via email and telephone regarding the discontinuation of services prior to closure.
5. The record of Pre-ETS shall be documented in the case management system when services have been discontinued. The DCRSA VR specialist or appropriate staff shall complete the “end date” on the Pre-ETS case information form to indicate closure of Pre-ETS. The end date shall be within two business days of the date on the DCRSA closure or discontinuation letter.
6. For VR clients, Pre-ETS shall cease to be provided under an IPE once the person no longer meets the definition of a student with a disability; or if the “student with a disability” has been moved into employed status. All other VR services may continue as planned.
7. If a person’s Pre-ETS case is closed while the person is waiting for VR services in a



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closed order of selection category, then IPE development and VR services will be delayed until the person is placed in an open priority category or DCRSA is able to serve their assigned priority category (Reference DCRSA Order of Selection Policy).

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