



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
**DEPARTMENT ON DISABILITY SERVICES**

<b>POLICY</b>	
Department on Disability Services	Subject: Pre-employment transition services
Responsible Program or Office: Rehabilitation Services Administration	Policy Number: 2019-RSA-POL004
Date of Approval by the Director: 02/13/2019	Number of Pages: 7
Effective Date: 02/25/2019	Expiration Date, if Any:
Supersedes Policy Dated:	
Cross References, Related Policies and Procedures, and Related Documents: The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act (WIOA) of 2014. DCRSA Eligibility Policy.	

**I. PURPOSE**

The purpose of this policy is to ensure that the Department on Disability Services (DDS), Rehabilitation Services Administration (DCRSA or Agency), in accordance with the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by the Workforce Innovation and Opportunity Act (WIOA) has a consistent and efficient statewide approach to providing pre-employment transition services to eligible and/or potentially eligible District of Columbia students with disabilities as they transition from high school, college, or vocational training to competitive integrated employment.

**II. APPLICABILITY**

This policy applies to all Vocational Rehabilitation (VR) Specialists, supervisors, managers, administrators, students with disabilities who are potentially eligible or eligible for VR services, and their families, advocates, and stakeholders of the DCRSA.

**III. AUTHORITY**

The authority for this policy is established in DDS as set forth in D.C. Law 16-264, effective March 14, 2007 (D.C. Official Code § 7-761.01 *et seq.*); and establishment of the Rehabilitation Services Program, D.C. Code § 32-331 *et seq.*

**IV. POLICY**

It is the policy of DCRSA that pre-employment transition services are made available to help all students with disabilities begin to identify career interests and to learn skills in preparation for transition to competitive integrated employment and/or postsecondary



education. Additionally, DCRSA will track the costs of pre-employment transition services to the level of required, authorized, and coordination activities as defined below (C-E).

A. Pre-employment transition services

1. DCRSA shall reserve 15% of its total federal allotment of 110 funds to provide students with disabilities with the five pre-employment transition services and coordination activities required by the Rehabilitation Act, as amended by WIOA, and identified in (C,2) below.
2. If reserve funds remain, DCRSA may provide additional authorized pre-employment transition services in accordance with the Rehabilitation Act, as amended by WIOA.

B. Target Population

1. Pre-employment transition services are provided District-wide to students with a disability who are:
  - a. Eligible for VR services in accordance with the DCRSA Eligibility Policy; or
  - b. Potentially eligible for VR services (i.e., all students with disabilities, including those who have not applied or been determined eligible for VR services).
2. “Student with a disability” shall be defined as a person who meets all of the following criteria:
  - a. Is at least 14 but no more than 22 years of age (a student remains eligible through the end of the semester in which he or she turns 22).
  - b. Has a disability, and has submitted the required qualifying medical documentation signed by a medical provider or a copy of his or her Individualized Education Program (IEP) or 504 Plan.
  - c. Has documentation confirming enrollment as a student in an educational program, including:
    1. Secondary school, including home school and alternative school programs (e.g., those housed within the juvenile justice system);



2. Post-secondary education programs approved by a federally-recognized accrediting agency under the U.S. Department of Education's Office of Post-secondary Education (OPE)
3. Adult basic educational programs which lead to a recognized educational credential (e.g., GED or high school diploma); and
4. State, nationally, or industry recognized certificate programs leading to a credential (e.g. Certified Nursing Assistant, Phlebotomy Technician, Microsoft Certification, Commercial Driver's License Certification, Automotive Service Excellence Certification).

Documentation of enrollment may include an IEP, 504 Plan, report card, college acceptance letter, college registration receipt, or other documentation from the educational program, and must be current each time a pre-employment transition service agreement is initiated to demonstrate that the student continues to qualify for these services.

#### C. Required Services and Statewide Availability

1. The primary purpose of pre-employment transition service provided or coordinated by the Agency is to help students begin to identify career interests and to learn skills in preparation for transition to employment and/or post-secondary education. DCRSA shall make every effort to provide or coordinate these services to ensure District-wide availability.
2. Required pre-employment transition services may be provided in a group and/or an individualized setting and are limited to any or all of the services listed below:
  - 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 (including internships), that are provided in an integrated environment to the maximum extent possible;
  - c. counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
  - d. workplace readiness training to develop social skills and independent living; and



- e. instruction in self-advocacy (including instruction in person-centered planning), which may include peer mentoring (including peer mentoring from people with disabilities working in competitive integrated employment).

D. Providing auxiliary aids and services under pre-employment transition services

1. Auxiliary aids and services include:

- a. Qualified interpreters 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; assistive listening systems; 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 (TTYs), 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 or hard of hearing;
  - b. Qualified readers; taped texts; audio recordings; Brailled 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;
  - c. Acquisition or modification of equipment or devices; and
  - d. Other similar services and actions.
2. DCRSA shall ensure that no qualified student with a disability is denied the benefit of pre-employment transition services on the basis of the person's disability. Therefore, if a student with a disability requires auxiliary aids or services to access or participate in any of the required pre-employment transition services, DCRSA may pay for such costs when no other public entity is required to provide such aid or service.
3. Pre-employment transition service funds may not be used to modify a student's personal equipment or devices, or to provide personal equipment or devices of which students would retain ownership.



#### E. Outreach and collaboration

1. DCRSA shall make every effort to develop and maintain cooperative working relationships with District secondary education staff (including alternative school programs), post-secondary education staff, District government operated programs, and workforce development partners to coordinate pre-employment transition services.
2. Pre-Employment Transition Coordination activities include:
  - a. Participating in IEP meetings for both eligible and potentially eligible students. Participation may be in person or by teleconference, when invited, pending DCRSA representative availability;
  - b. Attending person-centered planning meetings for students with disabilities receiving services under title XIX of the Social Security Act, when invited;
  - c. Working with workforce development partners, employers, and DCRSA network providers to develop work-based learning experiences for students with disabilities; and
  - d. Working with schools to coordinate and ensure the provision of pre-employment transition services. DCRSA will provide accurate information to referral sources regarding the timeline and application process for vocational rehabilitation services; and local education agencies (LEAs) will refer students with disabilities in secondary education as early as age 14 for pre-employment transition services and check on the status of these referrals.

#### V. RESPONSIBILITY

The responsibility for this policy is vested in the Director of DDS. Implementation of this policy is the responsibility of the Deputy Director of DCRSA.

#### VI. STANDARDS

1. Provision of pre-employment transition services to students with disabilities shall be:
  - a. Governed by DCRSA policies and procedures, and in accordance with District and federal law and regulation and the statewide educational cooperative agreement developed between the Office of the State Superintendent of Education and DDS.

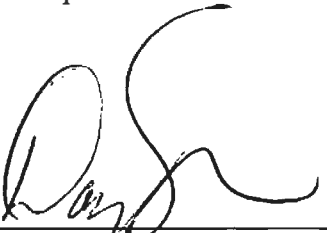


- b. Provided based on parental consent, when applicable, to participate in pre-employment transition services obtained pursuant to the State law, as well as policies of the educational programs.
2. Students with disabilities are not required to apply for or be determined eligible for VR services before 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 VR services.
3. A student with a disability who needs individualized vocational rehabilitation services, in addition to pre-employment transition services, must apply for and be determined eligible for the VR program and have an approved Individualized Plan for Employment (IPE).
4. Students with disabilities are not exempt from any of the order of selection requirements for VR services, but if a student receiving pre-employment transition services is found eligible for VR services and assigned to a closed priority category, she or he may continue to receive any and all pre-employment transition service while on a wait list for additional VR services.
5. When a student with a disability has an IPE, provision of pre-employment transition services will be included on the IPE.
6. Students who do not apply for VR services may continue to receive pre-employment transition services as long as they continue to satisfy the definition of a student with a disability.
7. Services and activities may be provided by a school under a contract with an LEA, or a service provider under the auspices of a DDS Human Care Agreement, or by other means determined and arranged by DDS provided DCRSA maintains direct administrative supervision over the expenditure of funds.
8. The assessment to determine a person's/family's contribution to the cost of services shall not apply:
  - a. to the provision of pre-employment transition services unless the student has been determined eligible for VR services, and participation in a specific pre-employment transition service requires payment of tuition or fees; or
  - b. when the student requires auxiliary aids and services to participate in pre-employment transition services.



However, D.C. regulations on consumer participation in cost of services based on financial need (29 DCMR § 124), and the possibility of a family contribution shall apply to all other non-exempt VR services included on the IPE.

- 9. Pre-employment transition services shall be discontinued once a person no longer satisfies the definition of a student with a disability, regardless of whether those services were being provided consistent with an IPE.
- 10. Pre-employment transition services shall cease to be provided under an IPE once the individual has been moved into employed status. All other VR services may continue as planned.

  
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Darryl Eyns  
Deputy Director, DCRSA

2/12/19  
Date

  
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Andrew P. Reese, Director

2/13/19  
Approval Date

