




Title:	Pre-Employment Transition Services (Pre-ETS) Delivered by Contract Providers
Procedure #:	80-VR-11-18
Policy Reference:	80-VR-11 Vocational Rehabilitation Services
Legal Reference:	ORC 3304.15; 34 CFR 361.5, 361.22, 361.24, 361.29, 361.32, 361.35, 361.36, 361.40, 361.48, 361.65
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Supersedes:	N/A
History:	N/A
Review/ Implementation	Begin Review – 03/01/19 Implement Revisions By – 09/01/19

I. PURPOSE

The purpose of this procedure is to provide direction for the provision of Pre-Employment Transition Services (Pre-ETS). These services are delivered by contract providers to students with disabilities who have been determined eligible or are potentially eligible for Vocational Rehabilitation (VR) services in accordance with appropriate federal (e.g. Code of Federal Regulations [CFR]) and state law (i.e. Ohio Revised Code [ORC], Ohio Administrative Code [OAC]) Governor directives and executive orders, other governing agency (e.g. DAS, OBM) policy or guidance, and/or Executive Director expectations.

Refer to the AWARE Manual for more detailed instructions regarding the management of cases in AWARE.

II. APPLICABILITY

This procedure applies to VR Staff and VR Contractors.

III. DEFINITIONS

Refer to “Vocational Rehabilitation Definitions” (80-VR-99.A).

IV. PROCEDURES

A. General

1. OOD shall provide information to individuals and if applicable, their parent or legal guardian throughout the Vocational Rehabilitation (VR) process as required by law (e.g. rights and duties). This information shall be provided, in writing, and when appropriate, in the individual’s native language or through an appropriate mode of communication.

2. AWARE shall be updated with pertinent conversations, recommendations, justifications, approvals and/or other actions taken in relation to this procedure.
 - a. VR Staff or VR Contractor shall obtain supervisory approval, if required, via use of an "Activity Due" in AWARE.
 - i. If supervisory or management approval is required during the VR process, the supervisor or manager shall document their approval in AWARE.
3. VR Staff or VR Contractors who are a Certified Rehabilitation Counselor (CRC-certified) and will be directly involved with an individual's case, he/she shall complete the "Professional Disclosure Statement" (80-VR-01.E).
 - a. VR Staff or VR Contractors who are not a Certified Rehabilitation Counselor (CRC) are exempt from this requirement.
 - b. Once completed, the "Professional Disclosure Statement" shall be reviewed and signed by the individual and, if applicable, his/her parent or legal guardian, and the CRC-certified VR Staff or VR Contractor.
 - i. Once signed, the statement shall be scanned into the AWARE Participant Module, as a Case Note, with the category "Professional Disclosure Statement" and summary title "Signed."
4. If an individual wishes someone other than his/her parent or legal guardian to take part in any area of the process for VR services, the individual shall be required to complete and sign a "Consent to Obtain and Release Information" (80-VR-01.G) form.
5. "Transition Services" (80-VR-11-12) shall be followed for direction regarding services that are considered Pre-ETS activities including transition specific services (e.g. Summer Youth Work Experience, School Based Job Readiness Training).
6. VR Staff shall refer to "BVR and BSVI Work Schedules" (50-PAY-01-01) for specific guidance on documenting actual time spent directly providing or arranging for the provision of any activity related to Pre-ETS.

B. Contracted (i.e. non-Fee Schedule) Pre-Employment Transition Services (Pre-ETS)

1. The "Pre-Employment Transition Services Fact Sheet" (80-VR-11-13.A) provides an overview of the Pre-ETS that will be purchased outside of the VR Fee Schedule (i.e. via contract).
2. The "Pre-Employment Transition Services Matrix" (80-VR-11-13.B) describes the five (5) types of Contracted Pre-ETS (as listed below) and includes the duration of services, activities to be completed during services, and the expected outcomes.
 - a. Job Exploration Counseling;
 - b. Work-based Learning;
 - c. Counseling on Post-secondary;
 - d. Workplace Readiness Training; and
 - e. Instruction in Self-Advocacy.

3. These five (5) services (2.a. - e.) can only be authorized and provided by providers who have current contracts with OOD.
4. Contracted Pre-ETS may:
 - a. be provided individually or in groups;
 - b. take place during or after school or in the summer depending on the activity, duration, availability of the student and if applicable, his/her parent or legal guardian, and coordination of partners; and
 - c. take place at a school, the provider's location, or other community location.
5. Students with disabilities may participate in contracted Pre-ETS as long as he/she:
 - a. is in an educational program;
 - b. is at least 14 years of age but not yet 22 years of age;
 - c. is eligible for or is receiving special education or related services under the Individuals with Disabilities Education Act (IDEA) or a student with disabilities for purposes of section 504 of the Rehab Act; and
 - d. has an identified need for one (1) or more Pre-ETS as determined by:
 - i. designated VR Staff for potentially eligible students with disabilities; or
 - ii. VR Staff or VR Contractors for students with open VR cases.

C. Contracted Pre-ETS Process for Potentially Eligible (PE) Students with Disabilities

1. Requesting Pre-Employment Transition Services

- a. A "Request for Pre-Employment Transition Services" (80-VR-11-13.C) form is only required for students with disabilities who are potentially eligible for VR services (i.e. do not currently have an open VR case). This form will primarily be completed by the student's school (i.e. referral source).
 - i. When school is not in session the "Request for Pre-Employment Transition Services" (80-VR-11-13.C) form may be submitted without the school's staff's signature.
 - a) When the form is submitted without a school's staff's signature, designated VR Staff shall obtain disability documentation and verify the individual is a student with a disability.
- b. The signed form serves as a valid release of information permitting OOD to share the student's information with his/her school and contracted provider of Pre-ETS.
- c. The completed, signed and dated form, including disability documentation identified on the form, is preferred to be sent, via secure email, to OOD.PreEmploymentRequestFax@ood.ohio.gov or faxed to 614-985-8435.

- 3.1 Individualized Education Program (IEP)
- 3.2 Evaluation Team Report (ETR)
- 3.3 504 Plan
- 3.4 SSI/SSDI Award Letter
- 3.5 Form for Eligibility Determination / Children's Form for Eligibility Determination (FED/CFED)
- 3.6 Ohio Eligibility Determination Instrument / Children's Ohio Eligibility Determination Instrument (OEDI/COEDI)
- 3.7 Individual Service Plan (ISP)
- 3.8 Psychological Evaluation
- 3.9 Other pertinent disability information (e.g. audiogram)

b) If the request is incomplete (i.e. missing required information or documentation), designated VR Staff shall complete the items below.

1) Return the request with any required attachments within three (3) days of the receipt of the initial request, via OOD secure e-mail, to the referral source indicating the specific information needed and that the information must be submitted within 15 business days.

1.1 *"Thank you for sending a "Request for Pre-Employment Transition Services" for (initials of the participant only). In order to process the request, we need all the required information. Please re-submit a completed request form including [insert missing information here] no later than [insert 15 business day date here]."*

"In order to support the informed choice of students and families, please ensure that information about all available contract providers in the region is shared with the student and his/her parent or legal guardian. This may include providers in other counties. If needed, you can visit <http://ood.ohio.gov/Transition-Students> for more information regarding services and providers. In addition, please note, the student can complete an application for Vocational Rehabilitation services at any time. Please visit OODWorks.com for more information."

2) Copy the OOD.PreEmploymentRequestFax@ood.ohio.gov inbox.

3) Move the original email with the attached request and the response email to the appropriate folder (i.e. "City – Incomplete Request").

3.1 If requested information is not received within 15 business days of the e-mail request, designated VR staff shall follow up with a phone call.

3.1.1 If requested information is not received within five (5) days after the phone call, designated VR Staff shall delete the incomplete request from the designated Pre-ETS inbox.

3. Creating a PE Case in AWARE for Students with Disabilities

- a. Upon receipt of a completed "Request for Pre-Employment Transition Services" (80-VR-11-13.C) form and all required documentation, Designated VR Staff shall create a PE case in the AWARE Participant Module.

- i. The only case statuses available in AWARE for a PE case are “Application” and “Closure”.
 - b. Designated VR Staff shall complete the pages listed below in the AWARE Participant Module.
 - i. Personal Information.
 - ii. Special Programs - check which Pre-ETS were requested.
 - iii. Education (specifically, the “Educational Goal”, “School Information” and “School Contact” areas) – ensure participant is marked “Student with Disability = Yes”
 - c. Once the AWARE pages are complete, Designated VR Staff shall e-mail the school regarding the receipt of the completed request form.
 - i. When a referral is made to a contract provider for one (1) or more services, designated VR Staff should use the following language:

“Thank you for your “Request for Pre-Employment Transition Services” for (initials of the participant only). This student has been referred for requested services to a local provider. The provider will contact the student and if applicable, his/her parent or legal guardian directly to arrange services.”
 - d. The Designated VR Staff may find the appropriate e-mail address by accessing the “School Contact” screen in AWARE and selecting “Send an E-Mail.”
 - e. The Designated VR Staff shall save the completed “Request for Pre-Employment Transition Services” (80-VR-11-13.C) form and any additional documentation, including the e-mail sent to the school, into an AWARE Case Note.
 - f. Designated VR Staff shall notify the student with a disability, and if applicable, his/her parent or legal guardian, using the “Pre-Employment Transition Services Confirmation of Request” (80-VR-11-13.E) letter in AWARE. This letter confirms the receipt of request and provides information regarding appeal rights.

D. Contracted Pre-ETS for Students with Disabilities With an Open VR Case

- 1. If a VR Case is created for a student with a disability who has an open PE case, VR Staff or VR Contractor shall:
 - a. “link” the cases; and
 - b. request that the designated VR Staff “share” his/her AWARE Case Notes by choosing “Share Note”.
 - i. Select the “Share Note” on any AWARE Case Notes that are applicable (e.g. relevant conversation with the school).
- 2. A “Request for Pre-Employment Transition Services” (80-VR-11-13.C) form is not required for a student with an open VR Case in order to refer him/her for contracted Pre-ETS.

- a. If a Pre-ETS request form is received, VR Staff or VR Contractor shall notify the referral source that the request was received and that the student has an open VR case with OOD. The notification shall be documented in an AWARE Case Note.
 - i. VR Staff or VR Contractor shall proceed with the review of the request including any attached documentation to determine if there is a need for Pre-ETS.
3. If a student on a VR caseload has a need for contracted Pre-ETS, VR Staff or VR Contractor shall ensure the documentation listed in Section C.2.b.iv. is in AWARE.
 - a. If the required documentation is not present, VR Staff or VR Contractor shall request any missing items prior to authorizing for Pre-ETS.
4. VR Staff or VR Contractor shall document the need for the service(s) in an AWARE Case Note.
5. Pre-ETS may be referred and authorized:
 - a. prior to an approval of an IPE for students who have a documented disability either in "Application" or "Eligible" status; or
 - b. after approval of an IPE regardless of status.
 - i. VR Staff or VR Contractor shall include contracted Pre-ETS as services in cases where there is an approved IPE.
6. If a student with an open VR Case is determined ineligible, he/she will no longer be able to participate in Pre-ETS regardless of case type and may not return to a "potentially eligible" status.
7. VR Staff or VR Contractor shall continue to ensure the student has an "Active Education Goal" on the "Education" page in AWARE in order to receive Pre-ETS.

E. Completion of Referral for Contracted Pre-ETS

1. When making a referral for an open VR case, VR Staff or VR Contractor shall discuss services and provider information with the student, and if applicable, his/her parent or legal guardian to determine which Contracted Pre-ETS provider best meets the need of the student (e.g. geographical area, expertise in serving disability type).
2. When making a referral for a PE case, designated VR Staff shall refer the student to the provider listed on the "Request for Pre-Employment Transition Services" (80-VR-11-13.C) form.
3. Regardless whether the case is a PE or an open VR case, VR Staff or VR Contractor shall proceed as detailed below.
 - a. Complete the "Referral for Pre-Employment Transition Services" (80-VR-11-13.F) form.
 - i. The referral form shall be attached to the authorization (refer to Section F below.)

F. Authorizations for Contracted Pre-ETS

1. Regardless whether the case is a PE or an open VR case, VR Staff or VR Contactor shall draft an authorization in AWARE and ensure that “Student with a Disability” is marked “Yes” on the AWARE “Education” page in order for the category of “Pre-Employment Transition Services” to show as “Service Category” option.
2. Drafting Authorizations for Contracted Pre-ETS
 - a. VR Staff or VR Contractor shall authorize Contracted Pre-ETS by using the Service Category “Pre-Employment Transition Services” and then the appropriate “Service Subcategory” (e.g. Instruction in Self Advocacy).
 - b. VR Staff or VR Contractor shall ensure each contracted service shall have its own authorization, which shall cover three (3) months.
 - i. Each Pre-ETS contractor has a negotiated unit of service (UOS) which auto populates in AWARE.
 - ii. The beginning date may start on any day of the first month and the ending date should be the final day of the third full month (e.g. 2-8-18 through 5-31-18).
 - a) If the student is being referred for multiple services, a separate authorization for each service should be drafted at the same time with the same dates.
 - b) When a student exits with a signed diploma and is not pursuing post-secondary education including training leading to an industry-recognized credential, the authorization must end on the date of graduation, as the individual is no longer a student with a disability who is eligible to receive Pre-ETS.
 - iii. The hours of service should not exceed the duration listed in the “Pre-Employment Transition Services Matrix” (80-VR-11-13.B).
 - c. VR Staff or VR Contractor shall document the service and units being requested in the “Other Comments – Not Printed on Authorization” box.
 - d. In a PE case, if a student completes the maximum number of hours and the provider is requesting additional hours, designated VR Staff may determine, on a case-by-case basis, whether to authorize for additional Pre-ETS.
 - e. Pre-Employment Transition Service Auxiliary services (i.e. interpreter, reader), if needed, shall be placed on a separate authorization (refer to “VR Purchases” [40-VR-01-06]) and “Interpreter, Reader and Personal Assistance Services (PAS)” [80-VR-11-16]).
 - i. AWARE has a separate service category titled “Pre-Employment Transition Services Auxiliary” for these services.
3. Issuing Authorizations
 - a. VR Staff, other than the one who drafted the authorization, (e.g. AE2) shall issue the authorizations for the max number of hours per service.

- b. The authorization shall be forwarded along with the “Referral for Pre-Employment Transition Services” (80-VR-11-13.F) form to the provider.
- c. Needed Pre-Employment Transition Service auxiliary services (i.e. interpreter, reader) should also be authorized in accordance with F.2.e.

4. Amending or Cancelling Authorizations

- a. If services are partially completed within the initial authorization period, the authorization may be extended for an additional three (3) months or to the end of the federal fiscal year which may be less than three (3) months (e.g. the original authorization ends 08/31/17 and it is determined that an extension is appropriate, the extension would only be able to be completed for one month because the federal fiscal year ends September 30th).
 - i. If after the extension, services are still only partially received, VR Staff or VR Contractors may determine, on a case-by-case basis, that an additional three (3) month extension (or to the end of the federal fiscal year which may be less than three (3) months or a total of nine (9) months), is appropriate.
 - ii. If at the end of the nine (9) months, services are still not finalized and 90 days have lapsed from the end date of the last extension, the amount of the authorization shall be amended to the actual number of hours provided and the case shall be closed, refer to Section G. “Case Closure.”
 - iii. If any extension is completed, the modified authorization shall be sent to the provider.
- b. If no provision of service occurred during the initial authorization period (i.e. 3 months), VR Staff or VR Contractor shall cancel the authorization and may issue a new one.
 - i. If two (2) authorizations have been issued and no services are received, VR Staff or VR Contractor shall cancel the authorization(s) and proceed to Section I. “Case Closure.”

G. Submission and Review of Invoice/Report

- 1. Providers are required to submit the “Pre-Employment Transition Services (Pre-ETS) Invoice/Report” (80-VR-11-13.G), once per month for services provided the previous month, via email at OOD.PreEmploymentInvoicingFax@ood.ohio.gov or faxed to 614-985-9720.
 - a. Submission, via email or fax, will suffice as a certification by the provider that services billed have been provided.
 - b. The provider should submit all of the students’ monthly reports at the same time each month.
- 2. Upon receipt and prior to processing for payment, VR Staff shall review the invoice/report including accompanying documentation, if applicable, and ensure that the following fields are completed:
 - a. invoice date;
 - b. authorization number;
 - c. service start/end date;

- d. student's name;
 - e. name of contractor's staff providing services;
 - f. VR Staff or VR Contractor's name;
 - g. date of service;
 - h. start time;
 - i. end time;
 - j. service description;
 - k. group size;
 - l. outcomes; and
 - m. narrative summary.
3. The invoice/report will automatically adjust the amount billed based on the Unit of Service (UOS) and the number entered in the "Group Size" column. VR Staff or VR Contractor shall follow the guidance in "Submission, Review and Payment of Case Services Invoices" (40-FIN-02-02) for processing the payment.

H. Monitoring PE Cases

1. Designated VR Staff, who have PE cases, shall perform an annual follow-up, within 30 days of the anniversary date of OOD's receipt of the "Request for Pre-Employment Transition Services" (80-VR-11-13.C) in order to ensure the individual continues to meet the definition of a student with a disability.
 - a. If a student has an open VR case, Designated VR Staff shall verify whether the individual is still a student with a disability by checking the AWARE Education Screen.
 - i. If it is verified that the individual is still a student with a disability, the letter in Section H.b. is not required.
 - b. If a student does not have an open VR case, Designated VR Staff shall send the "Pre-Employment Transition Services Annual Follow-up Letter" (80-VR-11-13.H), preferably via email to each student and if applicable, his/her parent or legal guardian, and the referral source to determine if the individual continues to meet the definition of a student with a disability.
 - i. When a response to the "Pre-Employment Transition Services Annual Follow-up Letter" (80-VR-11-13.H) is received, Designated VR Staff shall proceed as follows:
 - a) if confirmation is received that the individual continues to meet the definition of a student with a disability, Designated VR Staff may proceed with Pre-ETS as appropriate; or
 - b) if confirmation is received the individual no longer meets the definition of a student with a disability, Designated VR Staff shall discontinue Pre-ETS.
 - ii. If no response to the "Pre-Employment Transition Services Annual Follow-up Letter" (80-VR-11-13.H) is received within 10 business days, Designated VR Staff shall contact the referral source prior to closing the case using closure code "No Longer Interested in Receiving Pre-ETS".

I. Case Closure for PE Cases

1. When closing a PE case, designated VR Staff shall select the closure outcome of “Exited Program” in AWARE and utilize one of the four (4) closure reasons below.

a. Completed Pre-ETS

- i. All requested contracted Pre-ETS have been received; or
- ii. contracted Pre-ETS have been partially received, authorization(s) were issued with up to two (2) consecutive extensions, no additional invoice/reports have been received, and 90 days from the authorization end date has lapsed.

b. No Longer a Student and therefore no Longer Eligible to Receive Pre-ETS

- i. The student reaches 22 years of age; or
- ii. OOD receives information from a school, individual and/or student indicating the student has exited school.

c. No Longer Interested in Receiving Pre-ETS

- i. The student expresses they are not interested in receiving contracted Pre-ETS; or
- ii. two (2) consecutive authorizations have been issued but there has been no participation in contracted Pre-ETS.

d. Receiving Services under an Individualized Plan for Employment (IPE)

- i. If a student with a PE case applies for VR services, his/her PE case shall remain open in AWARE until the student has been determined eligible, and has received an approved service on his/her IPE.

2. Designated VR Staff shall send a “Pre-Employment Transition Services End of Participation Letter” (80-VR-11-13.I.) with appeal rights to each student and if applicable, his her parent or legal guardian, and the referral source upon case closure.

J. Violation

An employee who violates this procedure may be subject to discipline up to and including removal.

FORMS AND ATTACHMENTS

- 80-VR-11-13.A – Pre-Employment Transition Services Fact Sheet
- 80-VR-11-13.B – Pre-Employment Transition Services Matrix
- 80-VR-11-13.C – Request for Pre-Employment Transition Services
- 80-VR-11-13.D – Career Resources CA Regional Map
- 80-VR-11-13.E - Pre-Employment Transition Services Confirmation of Request
- 80-VR-11-13.F – Referral for Pre-Employment Transition Services
- 80-VR-11-13.G – Pre-Employment Transition Services (Pre-ETS) Invoice/Report
- 80-VR-11-13.H – Pre-Employment Transition Services Annual Follow-up Letter
- 80-VR-11-13.I – Pre-Employment Transition Services End of Participation Letter

RESOURCES

- Vocational Rehabilitation Definitions (80-VR-99.A)
- Professional Disclosure Statement (80-VR-01.E)
- Consent to Obtain and Release Information (80-VR-01.G)
- Transition Services (80-VR-11-12)
- BVR and BSVI Work Schedules (50-PAY-01-01)
- Case Closure (80-VR-02-01)
- VR Purchases (40-FIN-01-06)
- Interpreter, Reader and Personal Assistance Services (PAS) (80-VR-11-16)
- Submission, Review and Processing of Case Services Invoices (40-FIN-02-02)

REVIEW

It is the responsibility of the Deputy Director, or designee, to review this procedure, on or before, the date listed in the header and if applicable, make any necessary revisions. The Deputy Director, or designee, shall document the review as required in "Policy and Procedure Development, Review, Dissemination and Acknowledgement" (10-ADM-01).