

New Jersey Division of Vocational
Rehabilitation Services

Provider Guide

Pre-Employment Transition
Services for Students with
Disabilities

New Jersey DVRS, Programs Unit

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Section 1

Pre-Employment Transition Services

Purpose

The purpose of this provider guide is to disseminate information that will assist providers in the delivery of Pre-Employment Transition Services (Pre-ETS) that are consistent with the goals and priorities of New Jersey Division of Vocational Rehabilitation Services (DVRS). This guide provides information about DVRS expectations related to Pre-ETS for students with disabilities.

Overview

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014. Both the Rehabilitation Act of 1973, as amended under WIOA and the Individuals with Disabilities Education Act (IDEA) create a platform on which to improve options for students with disabilities (SWD). WIOA requires Vocational Rehabilitation (VR) agencies to set aside 15% of federal funds for the statewide provision of Pre-Employment Transition Services (Pre-ETS) to students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation (VR). The emphasis is on the essential need for students to transition smoothly and seamlessly from secondary education to post-secondary education options, independent living, and competitive integrated employment.

Students with disabilities, during their high school experience, are frequently in need of supplemental support to overcome gaps in service that are the result of specific barriers they encounter, and to foster post-secondary success. Students with disabilities that have begun post-secondary studies are often also in need of assistance while navigating the rigors of post-secondary education. It is vital that identified evidence-based predictors of successful post-secondary outcomes are used to assist students with disabilities in achieving success.

Whether the students' next step is employment, entering a post-secondary training or an educational program, it is important for students with disabilities to obtain as much work experience as possible to prepare for adult life.

Studies have also identified evidence-based predictors of positive post-secondary outcomes for all students in secondary education as they transition to live independently and experience vocational success. These predictors include career awareness, community experiences, interagency collaboration, occupational courses, paid work experience, parental involvement, financial literacy, independent living, informed choice, advocacy, and social skills.

What are Pre-Employment Transition Services

Pre-Employment Transition Services (Pre-ETS) are designed to address career development needs for students with disabilities who are not already receiving vocational rehabilitation services. Pre-ETS prepare students with disabilities for employment, explore their post-secondary education options, develop their employment-related soft skills, and assist them

in obtaining work experience. Pre-ETS provides a meaningful way to enhance the development of a student's career direction. The goal is for Pre-ETS to prepare students to become engaged in their own transition and vocational planning as well as for successful long-term employment consistent with their individual strengths, abilities, interests, and informed choice.



Students may receive all or some of the required Pre-ETS. Pre-ETS activities may be delivered to a single student or a group of students. Pre-ETS must be delivered in a way that utilizes experiential training approaches, must promote family involvement, and must take place in age appropriate, integrated setting.

The five required Pre-ETS activities are as follows, along with examples for each required activity:

1. Job Exploration Counseling

- Discussion of vocational interests
- Review of local labor market and in-demand industries and occupations
- Non-traditional employment options
- Identification of career pathways of interest

2. Work-Based Learning Experiences

- Apprenticeships (not including registered and pre-apprenticeships) and job shadowing
- Paid and non-paid internships and/or work experiences
- Informational interviews
- Volunteering

Work-Based Learning Experience Compliance Requirements

Work-Based Learning Experiences (WBLE) must comply with the federal labor law under the Fair Labor Standards Act (FLSA), Rehabilitation Services Administration (RSA) guidance, and DVRS policy. To protect students, providers, and employers, all WBLE must clearly define roles, responsibilities, and required documentation.

The following requirements apply to all Pre-ETS WBLE activities, including job shadows, informational interviews, volunteering, paid and unpaid internships, and workplace tours.

1. Distinction Between Training Site, Employer of Record, and Volunteer Site

a. Training Site: A training site is a business or community location where the student receives **instructional** or **exploratory** experiences supervised by the provider.

- The student is **not an employee**.
- The provider is responsible for supervision and ensuring instructional purposes.
- The activity must align with WIOA's definition of Pre-ETS exploration or skill development.

b. Employer of Record: If the student is **hired**, even temporarily, the employer becomes the *employer of record* and is responsible for:

- Wages
- Taxes
- Workplace safety
- Workers' compensation

Pre-ETS **cannot** be used for:

- Job placement
- On-the-job training
- Job coaching for employment
- Employer wage subsidies

Note: These fall under VR services, not Pre-ETS

c. Volunteer Site: A volunteer site allows the student to provide uncompensated service **without displacing employees** and without expectation of compensation.

- Must comply with community volunteer standards.
- Must not resemble unpaid work that should legally be paid under FLSA.
- Must offer primarily **learning**, not labor.

2. Requirements for Unpaid Internships (FLSA Compliance):

Unpaid internships **must** meet FLSA's criteria for a "bona fide training experience," including:

- a. The internship is for the student's educational benefit.
- b. The student does not displace paid workers.
- c. The student works under close supervision.
- d. The employer does not gain immediate advantage from the student's activities.
- e. There is no guarantee of paid employment at the conclusion.
- f. Both student and employer understand the student is **not** entitled to wages.

Providers delivering unpaid internship must ensure:

- The experience is documented as **instructional**.
- The provider, not the employer, controls the training content.
- Tasks performed match learning goals, not production labor.

3. Required Documentation for Work-Based Learning Sites

Before a student participates in a training or volunteer site, providers must ensure all required documentation is complete:

- a. Worksite Agreement: A written agreement between the provider and the business that outlines:
 - i. Purpose of the experience
 - ii. Roles of provider, employer, and student
 - iii. Liability and supervision responsibilities
 - iv. Safety protocols
 - v. Tasks aligned to learning objectives
 - vi. Confirmation that experience complies with FLSA criteria for unpaid participation
- b. Safety Training Documentation: Students must receive and providers must document:
 - i. Site-specific safety orientation
 - ii. Emergency procedures
 - iii. Hazard awareness and Personal Protective Equipment (PPE) requirements
 - iv. Any industry-specific credentials (when applicable)
- c. Background Checks (when required): If a provider employee or student enters a site requiring background clearance (e.g., healthcare, schools, child-serving settings), the provider must ensure compliance with the site's requirements **before** participation.

4. Supervision and Liability Requirements

Providers must ensure:

- Students are continuously supervised at the training site.
- Supervisors understand the learning goals and limitations of student's role.
- Students are not left alone or assigned tasks beyond the approved activities.
- Students are not performing hazardous duties prohibited for minors under state or federal law.
- Students are not performing work that constitutes unpaid labor under FLSA.

Note: Liability for students at community sites must be clarified through the worksite agreement.

5. Documentation and Reporting Requirements for WBLE

For each WBLE session, providers must document:

- Location of site
- Start and end time (billable instruction time only)
- Description of tasks performed
- Learning objectives addressed
- Student engagement and progress
- Any safety concerns or incidents
- Distinction between instructional activity vs. non-billable supervision or travel

3. Counseling on Enrollment in Post-Secondary Education

- Gaining awareness of career pathways
- Promoting participation in post-secondary education
- Attending college fairs and tours
- Connecting students to services and support from agencies that assist people with disabilities

4. Workplace Readiness Training

- Receive training on communication, problem solving, and other specific social and interpersonal communication as well as independent living skills and soft skills

5. Instruction in Self-Advocacy

- Training in self-awareness, disclosure of disability, and knowing individual rights and responsibilities

Who Can Receive Pre-Employment Transition Services?

WIOA also expands the population of students with disabilities who may receive Pre-ETS. Prior to the reauthorization of the Rehabilitation Act of 1973, VR could only serve students who were eligible for services. Now, Pre-ETS can be provided to students who are eligible, as well as to those students who are considered potentially eligible (PE) for VR services.

Potentially Eligible Students are Defined as: Students with a disability who have not yet applied or have been made eligible for VR services.

A Student with a Disability is an Individual who:

1. Is in an education program; and
 - Education programs include secondary education programs; non-traditional or alternative secondary education programs, including home schooling; post-secondary education programs; and other recognized education programs, such as those offered through the juvenile justice system. Pre-ETS are not allowable for a student who is “intending” to enroll in post-secondary education. The only way that students can continue to receive Pre-ETS after high school graduation is when there is **proof of enrollment** in a recognized post-secondary educational program. The Rehabilitation Services Administration (RSA) has shared that there are four pieces of supporting documentation needed to verify proof of enrollment, and VR will need to ensure **all four** (4) are in the case file.
 - Documentation that the individual with a disability graduated from secondary education
 - Documentation that the individual with a disability has been accepted into a post-secondary education institution/program
 - Documentation of the individual with a disability intention or confirmation that they had accepted the invitation to enter the post-secondary program
 - Documentation that the individual with a disability has been informed by the institution that their “seat” or “spot” is being held for them (this is relevant to students who are taking a gap year).
 - A gap year is a structured or unstructured year-long break that a student takes after graduating high school but before starting college, even if they have already been accepted to a college. The student delays matriculation for one academic year, usually with approval from college. It is a voluntary pause taken by the student for personal, academic, health, financial, or developmental reasons.
2. Meets the age range requirement for a student with a disability; and

- What WIOA says: Minimum age; not younger than the earliest age to receive transition services under IDEA; or not younger than the earliest age, if determined by the State as being different to receive Pre-ETS.
 - In New Jersey: Minimum age is 14 and the maximum age is 21. This aligns with the ages that transition services are provided by schools under IDEA.
3. Is eligible for, and receiving, special education or related services under Part B of IDEA; or
 - The student must have and receive services identified in an Individualized Education Program (IEP)
 4. Is an individual with a disability for purposes of section 504 of the Rehabilitation Act of 1973.
 - The student must have a disability that makes them eligible for a 504 plan. The student can have a 504 plan but is not required to have one.
 - Students with disabilities may be eligible for special education and related services under Section 504 because Section 504's definition of disability is broader than the IDEA's definition. To be protected under Section 504, a student must be determined to:
 - Have a physical or mental impairment that substantially limits one or more major life activities;
 - Have a record of such impairment; or
 - Relevant disability documentation
 - To meet the definition of a disability under the Americans with Disabilities Act (ADA), impairment must substantially limit one or more major life activities. Conditions that may be in remission also qualify. There is no exhaustive list of disabilities or what constitutes a "major life activity" or "substantial limitation".

Clarifying 504 vs. IEP Eligibility and Avoiding Misclassification (RSA Compliance)

The Rehabilitation Services Administration (RSA) has issued repeated national monitoring findings related to improper use of Section 504 documentation when determining access to Pre-ETS. To maintain compliance with WIOA and RSA guidance, DVRS and Pre-ETS providers must ensure that eligibility is based on **valid disability documentation** and **actual educational status**, rather than school-driven classification practices.

1. Proper Use of 504 Documentation

Students with disabilities who qualify under Section 504 are eligible to receive Pre-ETS; however, RSA requires that the disability be supported by **credible documentation of a physical or mental impairment that substantially limits one or more major life activities**. A 504 plan alone is not sufficient unless the disability determination is clearly documented.

Acceptable supporting documentation may include:

- School-based psychological evaluations
- Medical or clinical diagnostic reports
- Statements from educational staff verifying the disability and its functional impact
- Additional records verifying impairment status (e.g., Social Security Administration (SSA) benefits letter)

2. **Federal Findings Related to Overuse of 504 Plans**

RSA has identified a trend in some school districts nationally where students are being assigned 504 plans without adequate disability documentation solely to access Pre-ETS. This practice is **not compliant** with WIOA and may result in federal findings.

Pre-ETS may **not** be provided when:

- A 504 plan exists but is not supported by actual disability documentation
- The student's educational records do not verify the presence of a qualifying impairment
- A 504 designation was created for convenience or administrative purposes rather than disability need

3. **DVRS Provider Responsibilities**

To prevent compliance violations, providers must:

- Request and review disability documentation provided by DVRS prior to service delivery
- Confirm that DVRS, not the provider or the school, has verified disability status
- Notify the DVRS Counselor if documentation appears incomplete or inconsistent
- Never accept a 504 plan alone as proof of disability
- Avoid delivering Pre-ETS based solely on verbal confirmation from school staff

Note: Providers must defer all eligibility decisions to DVRS. Providers may collect documentation but may not determine whether a student qualifies for Pre-ETS.

4. **School-Based Pressure to Classify Students as 504**

Schools may sometimes seek access to Pre-ETS for a broader range of students and encourage classification of students as 504 even when disability criteria are not met. This is not allowable.

If a provider encounters:

- Pressure to serve students without disability documentation
- Requests to accept students newly labeled 504 without supporting records
- Attempts to classify whole groups of students as 504 for Pre-ETS access

The provider must:

- Reaffirm that DVRS determines disability eligibility
- Refer the school to the DVRS Counselor for clarification

- Decline to begin services until DVRS provides an authorization supported by valid documentation

5. **Compliance Reminder**

Providing Pre-ETS to students without verified disabilities, including those incorrectly assigned 504 plans, is a significant RSA compliance violation and may result in audit findings for DVRS. Providers share responsibility for preventing this by ensuring that:

- No services begin without DVRS authorization
- The student meets the federal definition of a “student with a disability”
- Documentation is maintained in the case file as required in Section 4 of this guide

Eligibility Maintenance and Restrictions on Pre-ETS for Non-Students (WIOA & RSA Requirements)

Under WIOA and RSA regulations, Pre-ETS may only be provided to individuals who meet the federal definition of a student with a disability. A provider must ensure that the individual continues to meet this definition for the entire period that Pre-ETS are delivered. Providers and DVRS must not deliver Pre-ETS to individuals who no longer meet the definition of a student with a disability, as this is a common RSA monitoring finding.

To comply with federal requirements, providers must understand when a student becomes **ineligible** and how to **verify continuing enrollment**.

1. When a student becomes ineligible for Pre-ETS: A student loses eligibility for Pre-ETS when the individual:
 - a. Is no longer enrolled in an education program
A student must be enrolled in one of the education programs described earlier in this section (secondary school, alternative program, post-secondary education, home instruction, or recognized education program). If enrollment ends, the individual is no longer considered a “student with a disability.”

A student becomes ineligible when:

- The student drops out of school and is not enrolled in another qualifying program
- The student withdraws voluntarily
- The student graduates from high school and does not meet RSA’s 4-part proof of post-secondary enrollment
- The student is not attending, and the school confirms the student is no longer enrolled
- The student fails to register, fails to attend, or fails to maintain enrollment in post-secondary education after high school

- b. Is expelled with no alternative education placement
A student expelled without placement in another recognized educational program is no longer enrolled, and therefore no longer eligible.
 - c. Completes high school without valid proof of enrollment in a post-secondary education program
Under RSA's definition of a "student with a disability," a youth who has graduated high school may only continue to receive Pre-ETS if DVRS has documentation demonstrating **all four (4)**:
 - i. Documentation that the individual with a disability graduated from secondary education
 - ii. Documentation that the individual with a disability has been accepted into a post-secondary education institution/ program
 - iii. Documentation of the individual with a disability intention or confirmation that they had accepted the invitation to enter the post-secondary program
 - iv. Documentation that the individual with a disability has been informed by the institution that their "seat" or "spot" is being held for them (this is relevant to students who are taking a gap year).
 - d. Ages out of eligibility
In New Jersey, eligibility ends at age 22.
2. Provider Requirements for Verifying Continuing Enrollment: To prevent providing Pre-ETS to non-students, one of RSA's most common audit findings, provider must verify student enrollment at three key points:
- a. At the start of services, the provider must obtain proof of enrollment through:
 - i. School referral
 - ii. Report card or schedule
 - iii. Post-secondary acceptance and enrollment documentation
 - iv. Other education program documentation
 - b. At least annually, providers must maintain updated proof of enrollment as required by DVRS.
 - c. Whenever there is doubt about enrollment status:
 - i. Stops attending
 - ii. Changes schools
 - iii. Moves
 - iv. Withdraws or is expelled
 - v. Indicates they are "taking time off"

Note: The provider must contact the school and/or DVRS Counselor to confirm enrollment **before** providing or billing additional Pre-ETS.

3. Documentation Requirements for Enrollment Verification
Providers must document:

- a. Type of education program (secondary, post-secondary, alternative, home instruction, etc.)
- b. Source of enrollment verification (letter, schedule, advisor confirmation, acceptance letter, confirmation letter, seat deposit, etc.)
- c. Date enrollment was verified
- d. Name and role of person who confirmed enrollment

Note: This documentation must remain in the students' case file and be updated annually.

4. Prohibited Practices: Pre-ETS for Non-Students

The following are not allowed under RSA regulations and must not be billed:

- a. Providing Pre-ETS to youth who have dropped out and are not in an educational program
- b. Providing Pre-ETS to high school graduates without complete proof of post-secondary enrollment
- c. Providing Pre-ETS to students who have been expelled with no alternative education placement
- d. Providing Pre-ETS to youth with 504 documentations only when no current educational enrollment exists
- e. Continuing to provide Pre-ETS when a student's enrollment status is unknown or unverified

Note: These practices would result in significant RSA findings against state VR agencies.

Eligibility Determination Requirements (RSA Restrictions)

Under WIOA and RSA regulations, community rehabilitation providers (CRP's) delivering Pre-ETS **cannot determine eligibility** for Pre-ETS and must not make determinations regarding whether a youth meets the definition of a student with a disability. Providers must defer all eligibility determinations to the Division of Vocational Rehabilitation Services.

DVRS is solely responsible for:

- Verifying disability status;
- Determining whether a youth meets the definition of a "student with a disability";
- Confirming enrollment in a qualifying education program;
- Ensuring all RSA required documentation is present; and
- Approving or denying access to Pre-ETS under either Potentially Eligible (PE) or VR status.

Providers may assist with obtaining or submitting documentation, but may not:

- Decide whether a youth has a qualifying disability;

- Declare a youth eligible for Pre-ETS;
- Decide that a student “counts” as enrolled based on verbal confirmation alone;
- Conduct or interpret diagnostic assessments to determine disability status;
- Approve a student to begin services without DVRS review.

These restrictions are required to ensure compliance with RSA regulations and to prevent the provision of Pre-ETS to individuals who do not meet the definition of a student with a disability, a common federal monitoring finding nationwide.

Provider Responsibilities During Recruitment and Outreach

When conducting outreach in schools or community settings, provider must:

- Refer all potentially eligible students to DVRS for eligibility screening;
- Avoid representing themselves as able to approve students for services;
- Explain that DVRS, not the provider, determines eligibility;
- Ensure no services begin until DVRS confirms the student meets the definition of a student with a disability and issues an authorization.

Documentation

Providers must maintain the student’s case file with the DVRS referral, authorization, and disability documentation supplied by DVRS. Providers may collect information to assist DVRS, but they must not independently certify or suggest that a youth is eligible.

DVRS Staff

Pre-ETS providers must work closely with the DVRS field office where they have agreed to provide fee-for-service Pre-ETS. Fee-for-service is based on a billable hour and current rates published by DVRS. The DVRS Counselor has full oversight and responsibility in managing the services on behalf of DVRS. Expectations, duties, and roles of the providers are detailed within this guide.

Informed decision-making is the process of choosing the options based on accurate information and knowledge. It is vital that students and their families participating in these services can make an informed decision as to which Pre-ETS activities the student needs. Pre-ETS options should be explored by the student, and the provider in a partnership that will empower the student to make decisions about the services they will receive.

Should the provider assist the students and their families with completing the DVRS Pre-ETS Student Referral form, the provider must submit the proof of disability for each student to the DVRS Counselor. The DVRS Pre-ETS Student Referral form must be signed by the parent or guardian if the student is under the age of 18. If the student is 18 or older and their own guardian, they are permitted to sign the form themselves. This action must be completed

prior to the initial service for the student. Late or non-submission of the documentation of disability or signature on the form will delay services.

The DVRS Central Office Programs Unit will review on an ongoing basis the results of:

- 1) The DVRS Counselor and provider's strategies to identify students with disabilities who are interested in receiving Pre-ETS including:
 - Family involvement strategies incorporated to facilitate the student's movement toward greater independence in vocational development and vocationally related pursuits;
 - Obtaining documentation confirming that the student meets the definition of a potentially eligible student with a disability prior to starting services;
 - Process for obtaining parent/guardian consent for minors who participate;
 - Process for identifying the Pre-ETS activities that meet the needs of each student, and;
 - Methods utilized for measurement of the impact of the services on expanding the provision of Pre-ETS to students with disabilities, including increasing skills attainment and increasing employment outcomes.
- 2) Progress of all partnerships
 - Discuss additional potential partnerships with the DVRS Counselors for approval of the partnership;
 - If vocational rehabilitation services are deemed necessary or requested, it is imperative that the service provider confers with the DVRS Counselor. This consultation should address the requirement for the initiation of a Vocational Rehabilitation (VR) case to facilitate the provision of the requested services.
- 3) Underperforming Providers
 - DVRS Counselors will work directly with any provider not meeting expectations to improve performance
 - DVRS Central Office Programs Unit will provide intensive technical assistance if improvement does not increase
 - Continued and ongoing performance concerns may result in termination of the fee-for-service Pre-ETS.

Referring Potentially Eligible Students for Vocational Rehabilitation Services

At any time during or after fee-for-service Pre-ETS, a potentially eligible student may apply for or be referred to vocational rehabilitation services. The DVRS Counselor will work with the provider to establish a procedure that will facilitate discussion and the seamless transition of any potentially eligible student who is receiving Pre-ETS through fee-for-service to DVRS for vocational rehabilitation services. The provider must obtain the appropriate

signed releases and will provide the DVRS Counselor with all the identifying and disability documentation that they have in their possession for the student being referred to DVRS.

When it is determined that a student with a disability would benefit from vocational rehabilitation services, the Potentially Eligible (PE) case must be closed as Transferred to VR, and the VR process must begin. If the student continues to need Pre-ETS, these services must be included and authorized on the Individualized Plan for Employment (IPE).

When a student with a disability receives Pre-ETS under fee-for-service in a PE case and has expressed interest in VR services, the provider and the DVRS Counselor coordinate to ensure that services delivered under PE status are not duplicated during the transition to VR services. The DVRS Counselor documents in Aware, the DVRS electronic case management system, that services are being provided under PE status and all open authorizations would need to be fulfilled or cancelled prior to closure of PE case type and opening of VR case type.

If Pre-ETS are required and the individual meets the definition of a student with a disability, Pre-ETS must be listed as a service on the IPE. All other VR services necessary to support the individual's employment goals must also be included. Pre-ETS are required to be listed on the IPE whenever they are part of the service plan.

Note: Not all students with disabilities who receive fee-for-service Pre-ETS as potentially eligible will need or choose to pursue DVRS services. DVRS involvement is only appropriate when a student requires services that are necessary to achieve competitive integrated employment.

The Five Required Pre-ETS

The five required Pre-ETS activities available to students with disabilities align with evidence-based predictors of post-secondary success and will enable students with disabilities ages 14-21 to gain a solid foundation upon which they can build successful, competitive, integrated, long-term careers, and independence.

The five required Pre-ETS are as follows:

1. Job Exploration Counseling: To assist students to explore career options and identify career pathways of interest, learn about skills needed in the workplace and for specific jobs, uncover vocational interests, understand the demands of the labor market, and learn about non-traditional employment options. Some sample activities include:
 - Administration of vocational interest inventories
 - Identification of career pathways of interest to the students
 - Career Awareness
 - Career Speakers
 - Career Student Organization

2. **Work Based Learning Experiences:** To assist students to develop work skills through participation in paid and nonpaid experiences in integrated community workplaces, apply classroom knowledge to the workplace, gain understanding of general employability skills (i.e., soft skills) important for success in the workplace, and learn from people currently practicing in the occupations and careers of interest to the students. This may encompass in-school, after-school, or non-traditional opportunities (such as internships) offered in an integrated environment to the greatest extent feasible. Some sample activities include:
 - Job Shadowing
 - Informational Interviews
 - Volunteering
 - Workplace Tours/ Field Trips
 - Career Mentorship
 - Career Related Competitions
 - Internships
 - Paid and non-paid Work Experience (non-paid work experience must follow the Fair Labor Standards Act)
3. **Counseling on Enrollment in Post-Secondary Education:** The post-secondary options that should be explored include Community Colleges (AA/AS degrees, certificate programs, and classes); Universities (Public and Private); Career pathways related to workshops/training/apprenticeship programs; Trade/Technical Schools; Military; and, Post-Secondary programs at community colleges and Universities for students with intellectual and developmental disabilities. Assist with researching career and post-secondary educational options. Individualized student strategies to support a smooth transition from high school to post-secondary education include:
 - Discuss the difference between special education services in K-12 education and post-secondary education disability services
 - Learn about accommodations for college entrance exams
 - Explore post-secondary opportunities associated with career fields
 - Provide resources that may be used to provide financial assistance (scholarships, financial aid, etc.) and support individual student success in education and training (i.e., disability support services)
 - Provide information about college applications and admission processes
 - Complete the Free Application for Federal Student Aid (FAFSA)
 - Learn about Achieving a Better Life Experience Act (ABLE) accounts and other financial strategies to save for post-secondary education or vocational programs
 - Develop “class shadows” in college and vocational training classrooms
 - Class Shadows allow a student to sit in on an actual college or training course for a short period, usually one class session to: expose the

student to a real post-secondary environment, help students compare training options, support informed choice, help determine whether a student is ready for college-level expectations, and help identify accommodations or support needs before enrollment

- Advise students and parents or representatives on academic curricula
- Tour University and community college campuses and talk to disability services on each campus
- Plan to visit the local Job Corps campus
- Types of academic and occupational training needed to succeed in the workplace.

Note: When taking students on college tours, agenda of the tour is required to be sent with the supporting documentation. The agenda should outline the timeframes of each activity. Social and recreation activities are not allowable billable activities under Pre-ETS. Travel time to/from the tour is not an allowable billing service.

4. Workplace Readiness Training: To enhance career exploration and develop soft skills, including social/interpersonal skills, independent living skills, financial literacy, orientation and mobility skills, job seeking skills, and develop understanding of employer expectations for punctuality and performance. Some sample activities include:

- Coach student on the appropriate use of social media
- Increase financial literacy skills
- Improve travel skills
- Enhance understanding of employer expectations
- Improve or develop independent living skills
- Promote positive social/interpersonal skills
- Develop job-seeking skills

5. Instruction in Self-Advocacy: To develop self-advocacy skills, students must learn how to speak up for themselves and make their own decisions about their lives. This involves understanding how and where to obtain information relevant to their interests. They should identify who can support them in their journey and become knowledgeable about their rights and responsibilities. Additionally, students need to learn how to request accommodations or services and support. Problem-solving, active listening, and continuous learning are essential components. Peer mentoring can also play a significant role. Furthermore, knowing when and how to reach out to others for help is crucial. Lastly, learning about self-determination is a key aspect of self-advocacy.

Some sample activities include:

- Assist in the development of positive self-identity

- Defining and developing elevator speech- An elevator speech for a student is a brief, impactful summary that concisely communicates their professional identity, key skills, unique qualifications, and career aspirations. Delivered in 30-60 seconds, it is designed to capture the listener's attention and highlight what sets the person apart. The speech should include the student's professional background, core competencies, notable achievements, and the value they bring to potential employers, collaborators, or network contacts. The aim is to make a memorable impression and foster interest in further discussion or opportunity.
- Increasing knowledge of rights and responsibilities
- Develop compensatory skills
- Develop leadership skills
- Explore proactive versus reactive thinking
- Explore student's intrinsic and extrinsic motivation
- Promote expressive and receptive skills
- Develop financial literacy

Evidence-Based Instruction Requirements for Pre-ETS (NTACT:C Guidance)

To ensure high-quality and consistent delivery of Pre-ETS, provider must use **evidence-based instructional practices** aligned with state and federal expectation, WIOA, and the National Technical Assistance Center on Transition: The Collaborative (NTACT:C). Evidence-based practice strengthens skills development, supports meaningful participation, and ensures that every session contributes to measurable post-school outcomes.

The following expectations apply for **all five required Pre-ETS activities**:

1. Structured, Evidence-Based Instruction

Each Pre-ETS activity must be delivered using a structured instructional model grounded in evidence-based practice such as:

- Explicit instruction (clear modeling, guided practice, independent practice)
- Scaffolded learning (instructional approach in which the provider breaks complex skills or concepts into smaller, manageable steps and offers structured guidance, such as modeling, prompts, visual supports, or practice opportunities, that gradually decreases as the student becomes more confident and independent)
- Differentiated instruction based on student need (providers adjust the content, method, or pace of instruction to meet each student's individual learning needs, strengths, and skill levels)

- Universal Design for Learning (UDL) principles (framework that guides providers to design instruction that is flexible, accessible, and supportive for all learners by offering multiple ways to engage with content, demonstrate understanding, and access materials)
- Experiential, hands-on learning
- Opportunities for practice and repetition
- Feedback-driven learning

Instructions must follow a predictable sequence that includes:

1. Introduction of learning objective
2. Modeling or demonstration
3. Student practice
4. Feedback and correction
5. Reflection or application

2. Fidelity of Implementation

Providers must ensure instructional fidelity by maintaining consistency with:

- The learning objectives listed in Section 2 of the Provider Guide (e.g., “The student understands...”)
- DVRS-approved Pre-ETS curricula
- NTACT:C recommendations for transition-focused skill development

Fidelity requires:

- Delivering lessons as designed
- Following curriculum structure
- Using the recommended instructional sequence
- Documenting deviations only when tied to student need

3. Clear, Measurable Learning Objectives

Every Pre-ETS session must have:

- A stated objective
- Measurable success criteria
- Alignment of one of the five required Pre-ETS activities

4. Evidence of Student Skill Progression

Providers must track and document student progress over time using:

- Student work samples
- Observation notes
- Participation indicators
- Performance-based tasks
- Reflections or self-assessments

Providers must track and document student progress over time using:

- Increased independence

- Increased understanding of Pre-ETS content
 - Growth in workplace readiness, self-advocacy, or career exploration
5. Activity-Specific Evidence-Based Expectation

Job Exploration Counseling

Instruction should include:

- Vocational assessments grounded in validated tools
- Structured career exploration frameworks
- Guided reflection tied to student interests and strengths

Work-Based Learning Experiences

Experiential learning must include:

- Pre-teaching (orientation, expectations)
- On-site skill practice
- Post-experience reflection
- Employer interaction aligned to NTACT: C's WBLE model

Counseling on Post-Secondary Options

Sessions must include:

- Explicit instruction on the differences between K-12 and higher education disability services
- Evidence-based college readiness strategies
- Guided decision-making frameworks

Workplace Readiness Training

Instruction should target:

- Social-emotional competencies
- Financial literacy (using validated curricula)
- Independent living skills taught through modeling, role-play, and applied practice

Instruction in Self-Advocacy

Instruction should be based on:

- Self-determination theory
- Explicit instruction in disclosure, rights, and communication
- Role playing, peer mentoring, and scenario-based learning

6. Documentation of Evidence-Based Instruction

To demonstrate compliance and fidelity, documentation must include:

- Lesson objective(s)
- Teaching strategies used

- Student response or outcomes
- Any curriculum materials or tools implemented
- Differentiation or accommodation provided

Common Terminology of Pre-ETS

The provision of Pre-ETS involves the collaboration of schools, vocational rehabilitation, and community rehabilitation providers, each bringing their own acronyms and language to the table. To ensure successful collaboration, it is helpful to have knowledge of some of the terminology one would encounter in the course of this work. Do not be afraid to ask about new terminology or acronyms frequently used in providing Pre-ETS.

Common Terminology and Acronyms of Pre-ETS	
Community Rehabilitation Program (CRP)	A CRP is an agency that can directly provide or facilitate vocational rehabilitation services as one of its major functions. The purpose of these services is to enable consumers to maximize their opportunities for employment.
Competitive Integrated Employment (CIE)	Work performed by a person with a disability in a setting that has a balance of peers with and without disabilities. Wages are at least minimum wage or higher and at a rate comparable to non-disabled workers performing the same tasks. To satisfy the definition of “competitive integrated employment,” the employment must satisfy the requirements for all three components: 1. Competitive wages and benefits; 2. Integrated setting; and 3. Opportunities for advancement. This means that if a consumer’s employment fails to satisfy any one of the above components, the employment will not meet the definition of “competitive integrated employment” per WIOA.
Customized Employment (CE)	Customized employment is a flexible process designed to personalize the employment relationship between a job candidate and an employer in a way that meets the needs of both. It is based on an individualized match between the strengths, conditions, and interests of a job candidate and the

	identified business needs of an employer. Customized Employment utilizes an individualized approach to employment planning and job development.
Fair Labor Standards Act (FLSA)	Establishes minimum wage, overtime pay, recordkeeping, and child labor standards affecting full-time and part-time workers in the private sector and in Federal, State, and local governments.
Family Education Rights and Privacy Act (FERPA)	A federal privacy law that gives parents' certain protections regarding their children's education records, such as report cards, transcripts, disciplinary records, special education records, contact and family information, and class schedules.
Free Application for Federal Student Aid (FAFSA)	A form that can be prepared annually by current and prospective college students (undergraduate and graduate) in the United States to determine their eligibility for student financial aid.
Independent Living (IL)	Independent living is both a philosophy and a movement that emphasizes the right of people with disabilities to make their own choices, control their own lives, and participate fully in their communities. It promotes self-determination, equal opportunity, and self-respect, rejecting the idea that people with disabilities should be viewed as dependent or defined by medical limitations.
Individual Education Program (IEP)	An Individualized Education Program (IEP) is a written statement of the educational program designed to meet a student's individual needs. Every child who receives special education services must have an IEP. The IEP has two general purposes: 1) to set reasonable learning goals for a student, and 2) to state the services that the school district will provide for the student.
Individualized Plan for Employment (IPE)	The Individualized Plan for Employment (IPE) is a written plan by DVRS outlining an individual's employment goal, and the services to be provided to reach the goal.
Individuals with Disabilities Education Act (IDEA)	Federal law makes available a free appropriate public education to eligible children with disabilities

	throughout the nation and ensures special education and related services to those children.
Local Education Agencies (LEAs)	A Local Education Agency (LEA) is a public board of education or other public authority within a state that has legal responsibility for administering, directing, or providing services for public elementary or secondary schools. This includes school districts, county or township school authorities, or any public entity recognized by the state as responsible for operating public schools.
Occupational Information Network (O*NET)	The O*NET system is maintained by a regularly updated database of occupational characteristics and worker requirement information across the U.S. economy. It describes occupations in terms of the knowledge, skills, and abilities required as well as how the work is performed in terms of tasks, work activities, and other descriptors. O*NET also includes wage information.
Person-Centered Planning	Person-centered planning is a process used to help an individual identify their goals, strengths, needs, and desired life outcomes, and to organize the services and support that will help them achieve those goals. It is directed by the person, emphasizes self-determination and choice, and focuses on creating a meaningful life in the community of their choosing.
Pre-Employment Transition Services (Pre-ETS)	A minimum of 15% of annual vocational rehabilitation federal award must be reserved for the provision of Pre-ETS which includes five required services, four coordination activities, and nine authorized services if funds remain after the provision of the required services to all students with disabilities who need them. The five required Pre-ETS are: 1. Job Exploration Counseling 2. Work Based Learning Experiences 3. Counseling on Enrollment in Post-Secondary Education 4. Workplace Readiness Training 5. Instruction in Self-Advocacy

Self-Determination (SD)	Self-determination is a concept reflecting the belief that all individuals have the right to direct their own lives. A self-determined person is one who sets goals, makes decisions, sees options, solves problems, speaks up for themselves, understands what supports are needed for success, and knows how to evaluate outcomes.
Soft Skills	Soft skills are essential for employees as they facilitate effective interaction with supervisors, colleagues, and customers. These skills enhance an individual's awareness of how they are perceived by others. Employers highly value employees who possess strong communication abilities and exhibit professional conduct. Regardless of the technical skills required for a specific role, interpersonal skills are universally necessary across all job functions.
Workforce Innovation and Opportunity Act (WIOA)	The Workforce Innovation and Opportunity Act (WIOA) is a federal law designed to strengthen and improve the public workforce system by helping job seekers, including youth and individuals with barriers to employment, access education, training, and support services needed to succeed in the labor market.

Section 2

Developing Services Based on Staff Resources and Logistics

Introduction

The requirement of vocational rehabilitation is to provide Pre-ETS to students with disabilities which have provided increased opportunities for agency personnel to work with students while in high school. However, it is important for an agency to consider both their organizational structure, as well as the needs of DVRS, to determine which Pre-ETS activities are both needed by VR and can be provided by the agency. It is also important to ensure that the services provided align with the mission of the agency as well as staff time and abilities. Some agencies may not be able to provide all five Pre-ETS activities but instead may focus on one or two required activities.

Other agencies may choose to expand their offerings by collaborating with entities such as other CRP's, Independent Living Programs, Parent Training Centers or other networks and organizations. Starting with the strengths of an agency in the delivery of Pre-ETS is suggested and then, if desired, build upon those strengths to either expand Pre-ETS activities by partnering with other entities or through hiring and/or training of staff.

Understanding Your Agency and Staffing

Mission

Many agencies have historically worked with adults or students as they are exiting high school, therefore mission statements have focused on this population. If considering expanding the provision of services to a younger student population by providing Pre-ETS, it may be a good idea to ensure the agency's mission aligns with this added focus. It is important to understand that the goal of students with disabilities participating in Pre-ETS is for them to gain the skills and knowledge to obtain competitive integrated employment, regardless of the severity of the student's disability. This goal is consistent with many agencies' missions that align with Employment First policies and the philosophy that there is a job for everyone who wants a job. Employment First is a statewide policy that makes competitive integrated employment (CIE) the preferred and primary outcome for individuals with disabilities who receive publicly funded services. New Jersey's Employment First policy states that all individuals with disabilities are presumed capable of working in CIE, and that state agencies must prioritize supports, services, and resources that help individuals obtain and maintain paid employment in typical community settings.

Planning

- Does the agency's current mission support the inclusion of providing Pre-ETS? If so, what services?
- What changes, if any, need to be made to the agency's mission to align with the delivery of Pre-ETS?

Staffing

Along with having the agency's mission aligned, agencies also need to have skilled staff to implement Pre-ETS or the results of these services may be limited. Staff should have knowledge of:

- 1) Effectively working with younger students
- 2) The ability to create relationships with community employers
- 3) Assisting in matching students with work opportunities
- 4) Understanding the various school constraints (student's schedules- students shouldn't be pulled out of a graduation required class, such as English, math, or physical education, to participate in Pre-ETS)
- 5) Identifying by arranging workplace support for the student, as needed
- 6) The ability to collaborate with multiple partners who are also working with students, including the student's family

Based on the critical role that staff play in the success of students in learning the needed employability skills and becoming employed, understanding the professional skill set (reliability, positive attitude, empathy, etc.) of effective staff is critical.

Staff Hiring and Training

The key to having competent staff is implementing an effective recruitment and training process. When managers understand the professional skill set of effective staff, they can target their recruitment efforts towards individuals who possess these characteristics. Additionally, as staff are hired, professional development opportunities should be provided focusing on enhancing and building skills around these skill sets.

Initial hiring of staff should include an opportunity for the potential employee to not only demonstrate their experience and education through a resume or application, but also through responding to case study type open-ended questions so the interview can explain specific examples of how they have demonstrated their skills (communication, cultural competence, collaboration, instructional, problem-solving, advocacy, etc.) in action. Individuals interested in entering the field of transition need to have a clear understanding of the professional skill set required to be effective in their role. Regardless of an applicant's specific work history, it is critical that hiring practices seek to find individuals who have the interest and can acquire the specific professional competencies (knowledge of disability law and policy, transition planning, data collection and outcome measurements, family and community engagement, professional collaboration and teamwork, etc.) to provide Pre-ETS, which lead to successful employment outcomes for students with disabilities.

It is a requirement that all staff providing direct student services attend All Things Pre-ETS training provided by DVRS Central Office Programs Unit Staff at least once per year.

Certificates of Attendance will be provided for each All Things Pre-ETS training. It is expected that the certificate will be placed in the employee's personnel file. When DVRS Central Office Staff conduct monitoring and oversight of the agency, this will be rated for compliance.

Below are some points to share with potential employees as well as questions one may want to ask during an interview:

- Schedules are based on needs of consumer, not on when staff prefer to work (may need to be on weekends and after school);
- Pre-ETS should be provided in the community, in the most integrated setting possible;
- There is no "unsuccessful" experience, all experiences provide DVRS with additional information about the student's interests, knowledge, and skills;
- Request the candidate to review the agency's materials thoroughly. Schedule a second interview where the candidate will present themselves as if they were meeting with a potential employer;
- Have the candidate describe their process of discovering the talents and interests of a student with a disability, and;
- Ask the candidate to read documents about a job seeker and write up 1-2 paragraphs highlighting key points about features the job seeker has related to employment. Finally, ask them to develop a tentative plan for assisting the job seeker in obtaining employment.

Required Staff Experience, Qualification's, and Oversight Activities

- The provider's Pre-ETS staff are required to have a minimum of an associate's degree in a Human Services or Related Field or in Education. In addition, there are at least two years of providing direct services in the education or employment to students with disabilities;
- All staff involved in the provision of Pre-ETS through fee-for-service must have experience using non-traditional community services/resources to engage students with disabilities in career exploration and employment. This includes working with students from diverse populations, including but not limited to cross-disability populations, English language learners, multicultural populations, Lesbian Gay Bisexual Transgender Questioning (LGBTQ+) identified students, students with mental illness or substance abuse disorders, and youth involved in the juvenile justice system;
- When staffing changes occur the agency is required to notify DVRS Central Office Programs Unit and field offices Managers. A temporary plan for continuance of services should be presented and must be reviewed by DVRS Central Office;

- All staff involved in the provision of Pre-ETS through fee-for-service are required to attend DVRS All Thing's Pre-ETS training within 30 days of hire;
- All staff involved in the provision of Pre-ETS through fee-for-service are required to adhere to the agencies background check and drug screening policies;
- The agency will work closely with DVRS Counselors to ensure DVRS fee-for-services are not supplanting or duplicating services for students with IEP's that they are already receiving or are supposed to be receiving through other funding or existing efforts' (that the school staff may be providing or delivering as outlined in the student's IEP). Funds from fee-for-services must not be used to pay for any transition services to students with IEP's that are considered mandated IEP services under IDEA. Students who have IEP's may receive Pre-ETS through fee-for-service to supplement but not supplant services that they are mandated to receive as outlined in their IEP's;
- If applicable, the agency must also work with DVRS Counselors to ensure that Pre-ETS fee-for-service funds are not used to provide services to students with disabilities that the agency is already funded to provide through another funding source (i.e. school districts and other local education agencies that fund pre-vocational, transitional or work experience services to students);
- All agencies will work with the DVRS Counselors to ensure the performance measures outlined are met as well as overseeing the collaboration with community partners, developing relationships with local businesses, and taking on new community partners when indicated.
 - Job Exploration Counseling
 - Learning Objective: The student understands what career exploration is and why it is important.
 - Performance Measure Options: Objective Met, Objective Not Met, Objective Partially Met
 - Counseling on Enrollment in Post-Secondary Education
 - Learning Objective: The student understands how education beyond high school is needed to access jobs in many areas.
 - Performance Measure Options: Objective Met, Objective Not Met, Objective Partially Met
 - Work Readiness Training
 - Learning Objective: The student understands the skills employers expect from employees.
 - Performance Measure Options: Objective Met, Objective Not Met, Objective Partially Met
 - Instruction in Self-Advocacy
 - Learning Objective: The student understands the importance of self-awareness.

- Performance Measure Options: Objective Met, Objective Not Met, Objective Partially Met
 - Work-Based Learning Experiences
 - Learning Objective: The student understands the skills employers expect from employees.
 - Performance Measure Options: Objective Met, Objective Not Met, Objective Partially Met
- The agency and DVRS Counselor will oversee the supervision of staff involved in the processes of identifying students with disabilities who are interested in receiving Pre-ETS; obtaining parent/guardian consent for minors; proof of disability; identifying the Pre-ETS that meet the need of each student; and developing a process for referring students to DVRS, if VR services are needed. As previously stated, the referral of students to DVRS for vocational rehabilitation services must be done in consultation with the DVRS Counselor.
 - Skills Trainers should be contacting the field office to determine the assigned DVRS Counselor prior to contacting the school districts;
 - Skills Trainers should be inviting the assigned DVRS Counselor when speaking and/or meeting with the school districts;
 - Skills Trainers market their Pre-ETS curriculum to school districts;
 - Often, the Skills Trainers make the initial connections with the Child Study Teams and assist with making the referrals to DVRS.

Examples of specific skills

Principle Optimism	Cultural Competence	Business Oriented	Network Savvy
Ability and interest in working with students	Ability to work with families and students from various backgrounds and ethnicity	Ability to work an adjustable work schedule to address needs of students, businesses and families (i.e. evening and weekends)	Ability to collaborate with multiple partners who are also working with students
Ability to identify positive traits of students	Ability to customize services based on needs of students	Ability to identify specific needs of businesses	Ability to network and negotiate effective partnerships

Willingness to learn new skills	Ability to creatively develop opportunities for students	Ability to develop community experiences for students	Ability to communicate effectively
Ability to act independently and work with a degree of autonomy		Ability to problem solve	Ability to balance time effectively and juggle multiple priorities

Identifying Which Pre-ETS the Agency can Provide

Once the agency has completed a review of its mission, identified the needs of DVRS and built the capacity and skills of staff, an agency can then identify which Pre-ETS the agency has the knowledge and ability to provide. To help with this, the table on the next page provides information about the Pre-ETS available for potentially eligible students and transition services available for students determined eligible for VR services. It is important to know that students eligible for VR services may also receive Pre-ETS.

Pre-ETS Provided to Potentially Eligible/ Eligible Students	VR Transition Services Provided for Eligible Students
Job exploration counseling includes career speakers, interest and ability inventories, sharing and using labor market statistics and trends Work-based learning experience, including coordination, selection of the work-based learning experience and setting: • Work site tours to learn about job skills • Business and career mentoring • Informational Interview • Paid/non-paid employment • Service learning (student-centered, experiential activity where youth participate in a community-focused project while building workplace readiness skills, including reflection, skill-building, and intentional learning outcomes)	Conduct all types of assessment services, i.e. testing abilities, assistive technology (AT), etc. Provide information in skill development to assist in exercising informed choice Job-related services, including: • Job search and placement assistance • Job retention services • Follow-up services • Follow-along services

• Volunteering	
Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs at institutions of higher education • Academic planning • College affordability planning • College and Career Exploration and Selection Process • Post-Secondary Education Application and Admission Process Workplace readiness training to develop skills and independent living • Communication skills • Financial literacy • Networking • Orientation and mobility skills • Problem solving and critical thinking • Teamwork Instruction in self-advocacy • Requesting and utilizing accommodations • Decision making including supported decision making • Disability disclosure • Goal setting and attainment • Leadership skills • Peer mentoring	Employment development activities • Job Coaching • Transition services for students with disabilities that facilitate the achievement of the employment outcome identified in the IPE • Supported employment services for individuals with the most significant disabilities • Services to the family of an individual with a disability necessary to assist the individual to achieve an employment outcome Examples: training or education to families, guidance on disability related employment needs, benefits counseling support, or participation in employment planning meetings.

Section 3

Collaborating to Improve Outcomes for Students with Disabilities

Introduction

Education and vocational rehabilitation each have separate mandates to assist students with disabilities in preparing for, obtaining, and maintaining competitive integrated employment. However, without clearly identified roles and coordination between the two agencies and other partners working with the student potential problems may occur with both the individual student and partner agencies. Poor collaboration may increase the already complicated path to adult employment for students with disabilities. Resources might not be used in the most effective and efficient way which may lead to duplication of services. This is why collaboration in the coordination of Pre-ETS is so important.

The importance of collaboration around Pre-ETS is broader than DVRS and education and includes other partners that may be contracted by DVRS to provide Pre-ETS. For example, agencies, Independent Living Programs and Parent Centers provide Pre-ETS to students with disabilities. While the opportunity to bring in more partners to work with students in providing Pre-ETS is a way for DVRS to provide services to more students with disabilities, additional partnerships also create a need for more coordination in planning and implementing Pre-ETS. This section will provide different strategies to consider in creating effective and efficient partnerships.

Collaboration Defined

Collaboration among professionals and service systems is an important component of effective programs that support the transition of students with disabilities from school to work and adult life. Collaboration can be defined as a formalized relationship and process that maximizes the expertise and perspectives of students, parents, educators, DVRS Counselors, and others. Relationships and processes should promote individualized services, support, and activities for students. Roles and responsibilities of each partner should be designed and focused on individualized student employment outcomes.

- When students with disabilities access collaborative services during high school, they are more likely to experience positive post-school outcomes
- Collaboration is effective when there is a direct focus on outcomes for students and the systems that serve them, rather than merely referring them for a “hand off” to the next responsible party
- Effective teams work to achieve a direct outcome for students served, rather than simply coordinate a transition to the next available post-secondary service
- Collaboration between schools, DVRS, and other partners is effective with a clear and compelling rationale for staff to work across agency lines
- Strategies for effective interagency collaboration include flexible scheduling and staffing; follow-up; administrative support; technical assistance supported by the state; ability to build collaborative relationships; agency meetings with families and

students; student and families training; joint staff training; and dissemination of information.

There are several types of collaborative partnerships that can occur for the purposes of transition planning. All transition partnerships fall under three main categories of teams:

1. Community-level teams connect schools, a district, or multiple districts with the community
2. School-level teams support the transition planning efforts for all students in the school
3. Individual-level teams support the transition needs of individual students.

It will be important to determine what team agencies should be a part of, as well as determine what specific role they play. Roles may be dependent on agencies' expectations as well as the scope of work. Teams will help provide the collaboration and resources to deliver services.

The following table describes the different team levels in a collaborative structure, their purpose, participants, and primary activities.

Team	Purpose	Participants	Activities
Community level	• Collaboration among schools (elementary, middle, high), DVRS, CRP's and other local agencies, employers, and parents • Focused on development and coordination of local policies and resources to create early and ongoing CIE experiences • Identify and address community needs in developing student skills and experiences that lead to CIE following high school graduation	• School District Administration • Special Education administrators and teachers • School Counselors • Vocational Rehabilitation Counselors • Employers • Department of Labor and Workforce Development (DOLWD)	• Coordinate and align local resources to provide competitive integrated employment experiences • Identify and address community needs related to student skill development and CIE after high school • Understand local business needs and engage employers to provide work experiences and employment for

		• Parents • CRP's • Post-Secondary Education/ Training • Mental Health • Other specific to the Community	student and young adults with disabilities • Provide opportunities for personnel and parents to learn about Evidence Based Practices of transition and CIE for students with disabilities
School level	• Collaboration across school curriculum and programs to address skill/career development for students with disabilities • Collect and analyze student data to identify and address areas of need • Create opportunities for family engagement and learning	• School Administration • Teachers (Special and General education, Career and Technical Education) • School Counselors • Vocational Rehabilitation Counselors • CRP's • Parents • Students • Others specific to the school	• Partner with DVRS Counselors and other community members in the provision of career development and community-based work experiences • Align curriculum and programs vertically across grade levels and content areas • Structured communication and intervention regarding student needs

Individual Student level	• Coordinate provision of individualized services and support in both school and community settings • Develop and carry out a plan based on student identified career goals beyond high school • Engage and communicate on regular basis with family regarding student needs and progress	• Student • School Administrator • Student's teachers (Special and General education) • Vocational Rehabilitation Counselor • School Counselor • Family • Other specific to student needs (i.e., CRP, probation)	• Identification of student career interests and needs • Development of plan with outcome-oriented goals and activities • Academic and employment skills development • Coordinated series of community-based work experiences, including paid work • Regular communication with family about student progress and needs
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Developing a Partnership Plan for Service Delivery

Having the important components of the partnership in a written document is recommended. This allows all partners to have a reference that outlines the organizational components of the partnerships. Additionally, as partners evaluate the effectiveness of their collaborative efforts, a planning document is a way to reflect on what has been agreed upon as well as determine what, if any, changes need to be made in moving the work of the partnership forward.

It is also important to determine what data will be used to measure the impact of the collaborative work. Data collected should help answer questions about identified performance and achieved measures and whether student outcomes are being met.

Navigating the School Environment

Developing effective partnerships with school personnel as well as gaining an understanding of how best to access the school environment will be key when working with students in high school. The school environment is the collection of physical spaces, routines, expectations, social settings, and support systems that make up a student's daily experience at school. It includes everything a student must understand, access, and interact with to be successful in their educational setting. Sometimes the introduction to the school may be done through the DVRS Counselor working with a particular high school. Every VR is required to have a state interagency agreement with education in every state. Some states also have local education agency agreements in addition to state agreements. The details of navigating the school environment may already be in place through these agreements. Even though an agreement may be in place, there may be strained or limited relationships between DVRS and the school and Skills Trainers may have to develop that initial relationship with the school. Whichever way the Skills Trainers forge that relationship with the school, the following are areas to consider as the agency begins the work with students in high school.

School Administration Buy-In

The principal oversees the daily functions of a high school therefore it will be important that they understand the agency's role and the value the agency brings in working within the high school and with students. When the agency gains the principal's understanding and support of the work, it will promote easier access to the school environment and students. In larger school districts, the agency may need to work with a Director of Special Education or Pupil Services initially and later work with the school principal. The key is that administration of the school must be aware and supportive of the agency's presence in the school. In some instances, the agency's presence at the school may be negotiated by DVRS.

Once the school administration understands the value of the agency's services, the principal can drive the process forward and help arrange for the agency's involvement with school staff and students. The school is no different from a typical business with whom the agency may be developing a partnership. The principal or administration will want to know what value the agency will bring to the staff and students they are charged with overseeing. Therefore, when the agency meets with the principal it is important to listen to their specific needs and then tailor the available services to fill a specific need of the school including the principal.

Organizational Structure

When working with schools there are some basic organizational issues the agency will need to determine with each school. Gathering this information can be covered during the agency's meeting with the principal or other school personnel assigned to work with the agency. Another great resource to learn about the school structure and expectations of students is the Student Handbook. Be sure to ask how the agency can obtain a copy.

Point of Contact

It is important to identify a point of contact at each school in which the agency is working. This person is someone who can assist the agency in navigating the school environment, schedule meetings, trouble-shoot any issues that may arise, and communicate with school personnel and students. The point of contact could be the office secretary, a school counselor, special education director, work-based learning coordinator, transition specialist or specific teacher.

Setting the Agency's Schedule

Given the complexities of school schedules, setting up a pre-determined schedule with school staff and identifying when the agency will be at the school and working with students is best practice. The frequency of the agency's visits to the school should be negotiated in advance, taking into consideration both the needs of the school, students and the agency's capacity. If a set schedule is not possible, all meetings with educators and students should be arranged in advance with all pertinent school personnel informed. A procedure must be in place to communicate unforeseen changes to the schedule.

Working with Students

The method by which the agency will gain access to students during school hours must be determined. It is important to recognize the demands of students and teachers to ensure the student is meeting their academic and credit requirements for high school graduation. School schedules often do not provide student the flexibility and luxury to leave core classes. Therefore, it is important to work with school staff and students to identify flexibility during the day and utilize time before and after the typical school day.

Another way to address issues with student schedules is to collaborate with school administration and DVRS to identify classes that include Pre-ETS. Developing the option of going into a classroom to provide individual or group work is often more efficient and effective because the agency is incorporating the services into course work activities which enhance student learning.

Section 4

Programming and Reporting Expectations for Pre-ETS

Data Collection

The Rehabilitation Act of 1973, as amended in WIOA, requires States to reserve at least 15% of their annual VR funding award for the provision of Pre-Employment Transition Services. These reserved funds must be spent providing or arranging for the provision of Pre-ETS.

Based on this requirement, VR agencies must ensure they are able to track Pre-ETS properly with the reserved funds and that their internal control processes ensure the accuracy and validity of the data have been implemented.

DVRS uses fee-for-service and contracts for the provision of Pre-ETS and can describe how these costs are allocated toward the funds reserved and restricts Pre-ETS reserve funds from being used to pay for other VR services.

Whether provided in a group setting or on an individual basis, the VR agency is required to track and report Pre-ETS and activities for each student receiving Pre-ETS. The following are required data elements for each student receiving Pre-ETS:

- Individual is a student with a disability and has a section 504 accommodation;
- Individual is a student with a disability and is receiving transition services under an Individualized Education Program (IEP), and;
- Individual is a student with a disability who does not have a section 504 accommodation and is not receiving services under an IEP.

DVRS also must maintain supporting documentation of the student's disability. Documentation may include the following:

- Case notes documenting counselor observation;
- Review of school records;
- Statements from education staff or a referral form for Pre-ETS with the identification of the student's disability, signed by school staff and parent/guardian (if the student is under the age of majority). Parental consent to participate in Pre-ETS is governed by State law as well as policies of the education programs and the Designated State Unit (DSU). DVRS is the general DSU in New Jersey. The Commission for the Blind and Visually Impaired (CBVI) is the blind DSU in New Jersey;
- A copy of an IEP document;
- Social Security Administration (SSA) beneficiary award letter;
- School psychological assessment, and;
- Documentation of a diagnosis or disability determination or documentation relating to 504 accommodations.

Based on VR's requirement to collect these data elements, it is imperative that agencies providing Pre-ETS have the capability and structure to, at a minimum, collect the same required data elements that VR is required to collect.

DVRS is collecting the following required data elements for an individual receiving Pre-ETS who has not applied for or been determined eligible for VR services:

- A unique identifier
- Social Security number (if available)
- Date of birth
- Race
- Ethnicity

When reporting required data for each Pre-ETS category for all individuals receiving Pre-ETS, the VR agency must also track and report the following data elements, which record how the service was provided, the type of service provider and the amount expended for the service:

- Whether the service was provided by VR Agency Staff (in-house),
- If provided through VR Agency Purchase
- Purchased Service Provider Type
- VR Program Expenditure for Purchase Service
- If provided by Comparable Services and Benefits Providers

In tracking these elements, VR must have policies and procedures in place with guidance regarding documentation and reporting requirements for non-applicants, applicants, and eligible individuals who are a student with a disability receiving Pre-ETS. VR agencies must analyze each cost to determine whether it fits within the scope of Pre-ETS. As previously stated, agencies will also need to have the capability to capture the same data elements.

Monitoring and Evaluation

DVRS is responsible for ensuring that all Pre-ETS delivered in New Jersey meet the highest standards of compliance, instructional quality, and student-centered practice. Monitoring and evaluation are required under WIOA, RSA, and Vocational Rehabilitation Technical Assistance Center – Quality Management (VRTAC-QM) and are essential in ensuring that Pre-ETS lead to meaningful, measurable outcomes for students with disabilities. Providers must understand expectations clearly and consistently demonstrate fidelity to federal and state requirements.

1. Alignment with Federal Expectations

WIOA Requirements

WIOA requires states to reserve 15% of annual federal VR funds for Pre-ETS and mandates tracking, reporting, and validating all services delivered to students with disabilities. DVRS must ensure that:

- Pre-ETS activities are limited to the five required activities
- Services are delivered only to students with verified disabilities
- Pre-ETS funds do not supplant IDEA/504 responsibilities of schools

- All expenditures are allowable, allocable, reasonable, and necessary
- Data is accurately tracked for every student receiving services

RSA Requirements

RSA mandates that DVRS monitor all purchased Pre-ETS to ensure:

- Compliance with federal guidance (including TAC-017-01)
 - Provides detailed direction on the implementation, documentation, fiscal requirements, and allowable activities for Pre-ETS under WIOA. TAC-017-01 clarifies: what constitutes an allowable Pre-ETS activity, the difference between required and authorized (flexible) services, which costs may and may not be charged to the 15% annual reserved Pre-ETS funds, documentation expectations for potentially eligible students, restrictions on supplanting or duplicating IDEA Transition services, and the requirement that Pre-ETS must directly benefit SWD and support one of the five required activities.
- Accurate billing for direct instructional time only
- Work-Based Learning Experiences meet FLSA, RSA, and DVRS standards
- Documentation verifies meaningful engagement, learning objectives, and student outcomes
- Providers maintain complete case files, enrollment documentation, disability documentation, and required forms

VRTAC-QM Standards

VRTAC-QM emphasizes strong quality assurance systems that ensure:

- Lesson plans and instructional delivery reflect structured, evidence-based practice
- Providers demonstrate fidelity of implementation
- Monitoring includes ongoing assessment of training, staffing, documentation, and service delivery quality
- Corrective actions are tied to data and performance trends

NTACT:C Expectations

NTACT:C identifies evidence-based predictors and practices tied to transition success and requires that Pre-ETS instruction:

- Use evidence-based instructional methods (explicit instruction, scaffolding, UDL, experiential learning)
- Include measurable learning objectives and structured skill-building
- Promote interagency collaboration and consistent communication with schools

2. What DVRS Monitors

DVRS evaluates providers across five key areas:

A. Regulatory Compliance

DVRS confirms that:

- Only the five required Pre-ETS activities are billed
- No non-allowable services (e.g., job placement, travel, supervision, IEP-mandated services) are not billed
- Documentation aligns with RSA's definition of direct service and "meaningful engagement"
- Services do not duplicate or replace school responsibilities under IDEA (non-supplanting)
- Providers do not determine eligibility or accept students without DVRS authorization

B. Service Quality & Fidelity of Instruction

Monitoring evaluates whether:

- Instruction follows evidence-based models (NTACT:C) such as explicit instruction and Universal Design for Learning (UDL)
- Sessions include measurable learning objectives, structured activities, and reflection
- Skills Trainers use differentiation, scaffolding, and accommodations when needed
- Community-based experiences follow RSA, DVRS, and FLSA guidelines
- Instruction occurs in age-appropriate, integrated settings

C. Documentation Accuracy & Completeness

DVRS reviews documentation for:

- Correct use of naming conventions (Last_First_PID)
- Required forms in case file (proof of disability, enrollment, consents)
- Activity logs reflecting date, duration, location, platform, lesson content
- Evidence of individual student engagement and response
- Accurate distinctions between billable and non-billable time
- Submission within required timelines

D. Billing Integrity

DVRS confirms that billing reflects:

- Only direct instructional time
- No billing for travel, supervision, preparation, recruitment, administrative tasks, or IEP-required services
- Accurate time documentation for group and virtual services
- Separate recording of individual student participation during group sessions

E. Performance & Outcomes

DVRS monitors providers performance through:

- Number of students served across service categories

- Engagement in meaningful, measurable Pre-ETS activities
 - Evidence of student skill development
 - Provider responsiveness to DVRS, schools, and families
 - Implementation of corrective actions
 - Trends in rejected reports or billing errors
3. DVRS Monitoring Methods
- A. Desk Reviews
- DVRS regularly reviews:
- Activity reports
 - Case files
 - Documentation of lesson content
 - Enrollment and disability documentation
 - Patterns in billing and corrective cycles
- B. On-site and Virtual Observations
- DVRS may observe:
- Classroom or community-based sessions
 - WBLE at training or volunteer sites
 - Virtual lessons
 - Provider interactions with schools and students
- C. Data Monitoring
- DVRS analyzes patterns in:
- Service delivery by category
 - Engagement trends
 - Approval vs. rejection rates
 - Progress toward Pre-ETS outcomes
 - Compliance with timelines and reporting
- D. Feedback From Schools and DVRS Counselors
- Monitoring includes gathering data on:
- Communication timeliness
 - Professionalism
 - Coordination with Child Study Teams
 - Barriers impacting student engagement
4. Provider Responsibilities During Monitoring
- Providers must:
- Demonstrate complete, accurate documentation
 - Maintain physical case file for all students
 - Attend DVRS All Thing's Pre-ETS training annually
 - Use DVRS-approved curriculum and instructional methods
 - Respond promptly to DVRS requests for information

- Maintain adequate staffing and notify DVRS of any changes
 - Participate in Technical Assistance (TA) when offered
5. Corrective Action Procedures
- If deficiencies are identified, DVRS may implement:
- A. Technical Assistance (TA)
- Coaching on documentation or instructional fidelity
 - Clarification of allowable vs. non-allowable billing
 - Guidance on WBLE compliance
- B. Corrective Action Plan (CAP)
- Includes:
- Specific issues to address
 - Timelines
 - Required changes
 - Follow-up assessments
- C. Increased Monitoring
- More frequent report reviews
 - More case audits
 - Additional on-site observations
- D. Temporary Suspension of Authorization
- DVRS may pause new authorizations if compliance risks are identified.
- E. Termination of Pre-ETS Agreement
- Persistent non-compliance may result in termination of fee-for-service Pre-ETS.
6. Continuous Quality Improvement (CQI)
- Monitoring is not solely an accountability tool, DVRS uses findings to support continuous improvement by:
- Identifying best practices
 - Sharing statewide trends and innovations
 - Strengthening provider training and technical assistance
 - Enhancing collaboration with schools and community partners
- Note: Providers are expected to participate actively in CQI by maintaining open communication, adjusting practices based on feedback and adopting evidence-based approaches aligned with NTACT:C and VRTAC-QM transition quality standards.

Accreditation Requirement

All agencies providing Pre-ETS on behalf of DVRS must maintain accreditation in Transition Services through the Commission on Accreditation of Rehabilitation Facilities (CARF) or another DVRS-approved accreditation body whose standards meet or exceed those of CARF.

Accreditation ensures that providers meet nationally recognized quality standards for delivering services to students with disabilities, including requirements related to:

- Student-centered planning and instruction
- Documentation and data management
- Service delivery and evaluation
- Staff qualifications and training
- Continuous quality improvement
- Health, safety, and risk management
- Ethical and professional practices

1. Accreditation Requirement

To remain eligible as a DVRS Pre-ETS provider, agencies must apply for and/or maintain accreditation specifically in CARF's Transition Services program area (or an equivalent DVRS-approved accreditation). The accreditation must directly cover the services that will be delivered under the DVRS agreement.

2. On-Site Survey Requirement

Agencies must schedule and complete an on-site accreditation survey conducted by CARF or another DVRS-approved accreditation body.

- The survey must evaluate the agency's Transition Services according to CARF standards.
- Agencies must submit confirmation of the scheduled survey and related documentation to the DVRS Programs Unit Staff.

3. Timeline for Accreditation

Accreditation must be fully obtained no later than the third year of operation under the DVRS contract or fee-for-service, following initial DVRS approval. Failure to meet this requirement may result in suspension or termination of approval provider status.

4. Documentation Submission

Agencies must submit the following to the DVRS Programs Unit Staff:

- The official accreditation letter
- The complete accreditation survey report
- Any follow-up documentation of corrective action reports required by the accrediting body

These documents verify compliance with accreditation standards and support DVRS's monitoring responsibilities for federally funded programs.

5. Provider Qualifications

Only providers with:

- demonstrated, relevant experience providing transition-related services to

SWD.

This ensures providers have the operational capacity, compliance knowledge, and quality systems required to deliver federally funded Pre-ETS services.

Significant and Critical Incident Policy and Reporting Requirements

Purpose

To ensure the safety, well-being, and protection of all students receiving Pre-ETS, DVRS requires each provider to maintain a written Significant and Critical Incident Policy. This policy must outline how the agency identifies, responds to, documents, and reports significant and critical incidents. Providers must submit this policy to DVRS for review and approval as part of Pre-ETS standards and compliance requirements.

This policy ensures alignment with:

- WIOA (student protections and program integrity)
- RSA requirements for monitoring, documentation, and safety
- VRTAC-QM expectations for quality assurance and risk mitigation
- NTACT:C standards for safe, supportive learning environments for students with disabilities
- CARF health and safety standards

Definition of Significant and Critical Incidents

A significant or critical incident is any event involving a student that threatens or has the potential to threaten the health, safety, security, or well-being of the student, peers, staff, or others. This includes, but is not limited to:

- Medical emergencies (e.g., seizures, injuries, sudden illness)
- Safety hazards or accidents occurring during Pre-ETS activities
- Behavioral incidents involving aggression, threats, or self-harm
- Mandatory reporting concerns (abuse, neglect, endangerment)
- Serious violations of school, community site, or provider policies
- Law enforcement involvement
- Incidents occurring during Work-Based Learning Experiences, job shadows, college tours, or community-based instruction
- Any situation requiring immediate removal of a student from a site
- Any event that interrupts services due to safety or security risks

Providers must ensure staff are able to identify and respond appropriately to such incidents in accordance with their agency policy, procedures, and applicable laws.

Provider Responsibilities During Critical Incidents

1. Immediate Response

Providers must ensure:

- Immediate safety and stabilization of student(s)
- Emergency services contacted if necessary (911, school nurse, security, etc.)
- Student supervised by qualified staff following agency procedures
- School or site personnel informed immediately when incidents occur on school grounds or community site

2. Notification Requirements

Providers must notify DVRS within **one business day** of any significant or critical incident. Notifications must be made to:

- The assigned DVRS Counselor
- The DVRS Field Supervisor Counselor and Manager
- The DVRS Central Office Programs Unit (assigned Program Planning and Development Specialist (PPDS), Contract Manager, and Chief)

3. Written Incident Report

Within **one business day**, providers must submit a written incident report that includes:

- Date, time, and location of incident
- Names of all individuals involved
- Detailed description of the incident
- Immediate actions taken by staff
- Emergency or protective measures implemented
- Parties notified (school, family, DVRS, law enforcement, etc.)
- Recommendations for next steps
- Any necessary modifications to ongoing services

DVRS Review and Follow-Up Actions

When DVRS receives a critical incident report, DVRS will:

- Review the incident with the provider to determine whether corrective actions or safety measures are needed
- Convene an internal DVRS review meeting (Central Office Leadership, Field Office DVRS Counselor, Supervising Counselor, and Field Office Manager, Programs Unit)
- Request additional documentation or clarification
- Determine whether changes to service delivery are required
- Recommend temporary suspension of services at the site if necessary
- Determine whether additional monitoring or technical assistance is required

Provider Adherence to Site Policies

Pre-ETS providers must follow all site policies and procedures, including:

- School district rules
- Community worksite safety requirements
- College campus protocols during tours
- Business-specific safety expectations during WBLE

Note: Students are expected to meet each site's established standards for behavior, safety, and conduct. Failure to meet these expectations may result in a significant or critical incident report and could require a modification of services or a temporary pause in participation.

Service Modification or Termination Considerations

DVRS may consider service modification, suspension, or termination **only** after careful review and collaboration among:

- DVRS Central Office Leadership
- DVRS Programs Unit
- DVRS Field Office
- Provider leadership
- Relevant school or community partners

Termination of a student from Pre-ETS activity is considered **a last resort** and must be:

- Based on documented safety concerns, violations, or repeated incidents
- Supported by evidence showing interventions and supports were attempted
- Reviewed collaboratively
- Documented thoroughly

In alignment with NTACT:C and VRTAC-QM best practices, DVRS and the provider must ensure:

- The student is offered alternative Pre-ETS activities, when safe and appropriate
- The student and family are guided toward other DVRS or community supports
- Including a transition plan that is established so the student does not lose access to services

Integration with DVRS Monitoring and Compliance

All significant and critical incident reporting requirements are part of DVRS's broader oversight obligations relating to:

- Compliance with federal and state safety requirements
- Continuous quality improvement (VRTAC-QM)
- Required documentation for monitoring under RSA
- Protective standards for students with disabilities under WIOA

- Ensuring high-quality, structured, evidence-based learning environments (NTACT:C)
- CARF accreditation health and safety standards

DVRS may incorporate incident trends into:

- Technical assistance planning
- Performance improvement strategies
- Monitoring cycles
- Contract compliance reviews
- Staff training recommendations

Document Naming Convention and Participant ID Number

Providers are required to obtain the student's Participant Identification (PID) Number prior to delivering any required Pre-ETS activities. The DVRS Counselor will provide the PID Number to the provider in a timely manner.

The student's PID number generates through the Aware case management system.

Required forms/documents electronically sent to the DVRS Counselor must contain a naming convention as specified below:

Use the student's legal name only (no use of shortened names or nicknames or preferred names permitted). The name and PID Number will be supported with documents in the student's case file. The provider is responsible for maintaining a case file for each student.

The method will be last name; underscore; first name; underscore; PID Number.

Example: Jon Smith Legal name: Jonathan Smith

The naming convention for the report forms will be: Smith_Jonathan_123456

For hyphenated names the naming convention for Carmine Vasquez-Smith with PID Number of 123789 will be: Vasquez_Smith_Carmine_123789

This will be consistent throughout the delivery of services to the student.

Physical Case File

Providers are required to maintain a physical file of the student's case. The physical file must be updated and maintained if the student continues to receive Pre-ETS and up to age 22. For fiscal requirements, case documentation must be maintained for seven years plus the current year from the last date of service delivery payment.

The physical case file must contain the following documents:

- Intake and/or Referral forms: including Youth Services Provider Engagement Form;
- Consent and Release forms: including photo release form;
- Proof of Disability;

- Proof of enrollment in an education program (i.e. referral from school, report card, other documentation from education program);
- Student Attendance Sheets
 - It is a requirement that all students sign into the session. This can be kept as an attendance log by the provider with student signature. If there is a meeting virtually, the chat feature of the meeting should include each student checking in via chat feature and Skills Trainer printing, screen shotting, or saving the meeting chat, and;
- Authorizations and support documentation

Note: Providers are responsible for submitting to the DVRS Counselor updated consent and release forms and proof of enrollment at least annually.

Billing for Services Under Fee-for-Service

Timely submission and review of authorizations and reports is critical to the success of fee-for-service Pre-ETS. Reports on completed services and the corresponding service documentation must be submitted to the DVRS Counselor as soon as possible to ensure prompt review and approval for payment for services rendered.

Recommended service hours on authorizations should fall within 10–20 hours per service category. All services listed in the activity reports must reflect service provisions that are allowable, allocable, reasonable, and necessary.

Allowable activities under billing are as follows:

1. Agencies can only bill for services provided directly to the student with a disability;
2. The only allowable activities that can be charged are the five required Pre-ETS activities;
3. Report writing and curriculum preparation are tied into the hourly reimbursement rate (additional details below);
4. Providers cannot bill for missed appointments, and;
5. Pre-Placement activities including applying for employment, preparing for a job interview, and new hire orientation/onboarding are **not** allowable under Pre-ETS.

Non-Billable Preparation and Administrative Activities (RSA Requirements)

Under RSA regulations and WIOA guidance, providers must bill only for **direct, allowable Pre-ETS activity delivery**. Preparation activities, administrative tasks, and coordination work are built into the Pre-ETS reimbursement rate and **may not** be billed separately. These prohibitions prevent overbilling and ensure services are tied directly to meaningful instruction provided to students.

The following activities are **non-billable** under all circumstances:

1. Lesson Planning and Curriculum Preparation

Provider may not bill for:

- Creating, modifying, or updating lesson plans
- Developing instructional materials
- Reviewing or preparing curriculum content
- Preparing for sessions, including researching topics or printing materials

2. Administrative and Coordination Tasks

The following activities are part of general provider operations and are **not** billable as Pre-ETS:

- Scheduling sessions with schools or parents
- Emailing teachers, counselors, or administrators
- Internal staff meetings or supervision discussions
- Completing internal forms or compliance documentation
- Organizing files, calendars, or communication logs
- Travel planning or transportation coordination

Note: These tasks are necessary to run a program but do not constitute direct student instruction.

3. Non-Billable Communication with Parents or Schools

Communication with families, school personnel, and community partners is billable **only when** the conversation directly supports a specific Pre-ETS service for a specific student.

Non-billable examples:

- General check-ins not tied to current Pre-ETS activity
- General parent engagement unrelated to a service objective
- Discussing logistics, scheduling, or attendance
- Providing general advice or emotional support
- Teacher/staff introductions or routine updates

Billable only if:

- The communication directly advances the student's participation or learning in a required Pre-ETS activity
- The purpose is documented in the Pre-ETS activity report

4. Non-Instructional Documentation Time

Providers may not bill for:

- Writing or editing reports outside of direct service documentation required by DVRS
- Updating student case file beyond activity logs
- Preparing case notes, summaries, or administrative paperwork
- Uploading documents or correcting rejected reports

Note: Only the **time required to complete the DVRS service delivery report directly tied to a Pre-ETS session** is included in the Pre-ETS rate. All other documentation is non-billable.

5. Non-Billable Student-Related Time

The following time is not billable because it does not constitute active instructional engagement:

- Waiting for students to arrive
- Supervising students during transition, travel, or breaks
- Escorting students between locations
- Monitoring students outside of a lesson
- Observing students without active instruction

6. Provider Recruitment or Outreach Activities

Providers may not bill for:

- Presenting Pre-ETS information to schools
- Marketing Pre-ETS activities
- Meeting with new districts or community agencies and organizations
- Helping schools identify potentially eligible students

Note: These activities are part of provider operations, not direct service delivery.

Non-Allowable Content Within Otherwise Allowable Pre-ETS Activities (RSA Requirements)

In addition to the non-billable tasks and administrative activities previously described, RSA requires that **only the direct instructional portions of allowable Pre-ETS activities may be billed**, and that providers clearly distinguish between **allowable instructional content** and **non-allowable activities** occurring within the same session. Even when a Pre-ETS category is allowable, portions of the session may not meet federal criteria for billable time.

Providers must ensure that **every minute billed** reflects meaningful, objective-driven instruction aligned with one of the five required Pre-ETS services.

1. **Social and Recreational Activities Are Not Billable**

Social, recreational, or leisure activities cannot be billed **even if** they occur during an otherwise allowable Workplace Readiness Training or Self-Advocacy session.

Examples of non-allowable activities include:

- Games, celebrations, parties, or social events
- Recreational activities such as sports, crafts, or entertainment
- Unstructured peer socializing not tied to a measurable Pre-ETS objective

Note: If an activity is not directly tied to skill development, it is non-allowable and may not be billed.

2. **Activities With No Link to Measurable Skill Development Are Non-Allowable**

All Pre-ETS activities must include a stated learning objective and measurable skill-building component. Time spent on activities that:

- Do not advance a Pre-ETS learning goal
- Do not include instruction, modeling, practice, or feedback
- Do not relate to one of the five required Pre-ETS categories

Note: these are considered non-allowable and cannot be included in billable minutes.

Examples of non-allowable content:

- Watching videos without facilitated instruction or discussion
- Passive supervision without engagement
- General conversations unrelated to Pre-ETS objectives
- Unstructured downtime, waiting, transitions, or non-instructional observation

3. **Pre-ETS Cannot Be Used for Job Placement or Job Coaching**

RSA prohibits the use of Pre-ETS funds for any activities that are part of job placement, job development, or job coaching for competitive integrated employment. Non-allowable activities include:

- Assisting a student in applying for jobs
- Helping with job interviews, onboarding, or employer paperwork
- Providing on-the-job training or job coaching
- Coordinating competitive integrated employment placements
- Supporting the student in tasks required by an employer

Note: These are VR services, **not** Pre-ETS, and require a VR plan (IPE) rather than a Pre-ETS authorization.

4. **Providers Must Separate Allowable Instruction from Non-Allowable Content**

When an activity session includes a mix of allowable and non-allowable content:

- Only the portion that constitutes **direct instructional time** may be billed.
- Non-allowable content must be excluded from the activity duration.
- Documentation must clearly reflect the instructional segment, objectives, and student engagement.

Note: Provider must maintain clear boundaries to ensure compliance with WIOA, RSA TAC-17-01, and DVRS billing requirements.

Delivery Policy and Operational Requirements

1. **Initiation of Pre-ETS Instruction**

A Pre-ETS session begins only when the Skills Trainer and the student engage in **meaningful, goal-directed interaction** directly tied to an authorized Pre-ETS activity. Activities such as travel, waiting, administrative communication, or non-instructional conversation do not constitute service delivery.

2. **Modifying Lesson Plans During a Session**

When a planned lesson must be changed due to student needs, behavior, or classroom dynamics, the Skills Trainer must transition to another **authorized Pre-ETS topic**. The session is considered active once meaningful instruction begins under the revised activity.

3. **Group Instruction Requirements- Single Lesson**

When multiple students receive instruction simultaneously, the Skills Trainer must deliver a unified lesson while using **differentiated instructional strategies** to meet individual learning needs. All instruction must align with an authorized Pre-ETS activity.

4. **Group Instruction Requirements- Multiple Lessons**

Skills Trainers may provide **different lessons to different students within the same group session** if the student receives individualized instruction tied to their authorized Pre-ETS activity. Documentation must reflect **time spent per student per lesson**.

5. **Temporary Student Departure from Session**

If a student leaves a session, billable time ends at the moment of departure and resumes only upon the student's return **and** the resumption of meaningful, goal-directed instruction interaction.

6. **Emotional or Behavioral Regulation During Instruction**

When a student is emotionally dysregulated but remains engaged through meaningful, instructional conversation supporting re-engagement, the student is considered active and billable. Emotional support dialogue is allowable when it directly enables participation in an authorized Pre-ETS activity.

7. **Ailing or Hesitant Students**

A student experiencing illness or uncertainty is considered active if the Skills Trainer provides **meaningful, goal-directed instruction** that supports participation in the Pre-ETS activity.

8. **Student-Requested Topic Changes**

When a student requests a change in lesson content, the Skills Trainer may shift to another authorized Pre-ETS activity. Billable time continues once meaningful instruction in the new topic begins.

9. **Trainer-Initiated Topic Changes**

When a Skills Trainer changes the lesson topic for instructional, engagement, or behavioral reasons, only students **authorized for that specific Pre-ETS activity** may be billed for time spent on the new topic.

10. Students Present but Refusing to Participate

A student who refuses to perform tasks but engages in meaningful instructional interaction (e.g., listening, responding, participating verbally) may be billed. Presence alone without engagement is not billable.

11. Delayed Engagement

Billable time for a student who initially refuses to engage begins **when meaningful engagement starts**, not at arrival.

12. Engagement Without Assignment Completion

A student who refuses a written or hands-on assignment may still be considered active when demonstrating meaningful engagement (e.g., listening, asking questions, responding). Assignment completion is not required for billability.

13. Mild Disruption During Group Lesson

Mild disruptive behavior (e.g., joking, talking out of turn) does not disqualify billable time when the student continues to demonstrate meaningful engagement. Billable time ends if behavior prevents instruction from occurring.

14. Late Arrivals

For late-arriving students, billable time begins when the student receives lesson expectations and participates in meaningful, goal-directed instructional exchange.

15. Policy on Billing for Students Who Exhibit Disruptive Behaviors but Demonstrate Meaningful Engagement

When students display mild disruptive behavior (e.g., talking out of turn, joking, or distraction) but continue to demonstrate **meaningful engagement**, such as responding to questions, showing understanding, or participating cognitively, the time remains **billable**. The Skills Trainer must confirm that instructional activity continues and that learning is occurring. Billable time **must cease** when disruption prevents instruction, stops meaningful engagement, or requires solely behavioral supervision.

16. Policy on Billing for Late-Arriving Students

For students who arrive late to a session, billable time begins when the Skills Trainer: 1) Provides expectations, structure, or orientation necessary to enter the Pre-ETS lesson, and 2) The student engages in **meaningful, goal-directed instructional interaction** related to an authorized Pre-ETS service.

Passive presence before engagement does not constitute billable time.

17. Policy on Billing for Virtual Group Services

In virtual group sessions, billable time must be tracked **individually** for each student. Billable time begins when the student joins the session and demonstrates meaningful engagement (e.g., responding, participating, listening with observable

attention). Billable time ends when the student disconnects or when meaningful engagement stops.

18. Early Termination of Lessons

When a session must be discontinued due to behavior that prevents learning or due to safety concerns, billable time ends at the moment instructional service ceases. Behavior management alone is not billable.

19. Off-Site or Out-of-School Instruction

When students are absent from school but receive services in alternate locations or through virtual platforms, staff documentation serves as the official record of participation.

20. Student-Imposed Session Limits

If a student ends a lesson early but retains authorized hours for other Pre-ETS activities, the Skills Trainer may transition to another authorized service. When student exceeds available hours, the Skills Trainer must coordinate with the DVRS Counselor to request additional hours from DVRS.

21. Policy on Lesson Planning and Attendance Documentation Requirements

a. Lesson Structure Requirement

Every Pre-ETS session must include:

- A clear **goal** describing intended student learning,
- At least one **objective** identifying the specific skill or knowledge targeted, and
- **Relatable, Pre-ETS aligned instructional content** that directly supports the goal or objective.

Note: This requirement ensures that instruction is purposeful, structured, and aligned with WIOA, RSA, and VRTAC-QM expectations for evidence-based Pre-ETS delivery.

b. Attendance Documentation Requirement

Providers must maintain attendance records for every session, including:

- Names of students who attended,
- The date of the session,
- Start and end times,
- The Pre-ETS activity delivered.

Note: These elements are required for compliance with WIOA and RSA monitoring standards.

22. Policy on Documenting Instructional Strategies, Interventions, and Differentiation

When Skills Trainers use **specific instructional strategies, interventions, differentiated instructional techniques, or individualized supports**, these must be documented in the Summary Report. Documentation must describe:

- The instructional methods used,
- Why were these methods selected,
- How they supported the students' learning, and
- How they aligned with the student's disability-related needs or functional abilities.

Note: This requirement ensures compliance with WIOA's expectation for **purposeful, individualized instruction**, RSA's requirement to document **instructional method and student response**, and VRTAC-QM standards for differentiated, evidence-based instruction.

Examples of instructional strategies that must be documented include:

- Differentiation (e.g., chunking, modeling, visual supports),
- Scaffolding or step-by-step instructional supports,
- Behavioral or emotional support strategies used during instruction,
- Alternative communication methods (e.g., text-based responses, augmentative and alternative communication (AAC),
- Accommodations or modifications,
- Engagement strategies that facilitated learning.

23. Parent/Guardian Meeting Participation

Skills Trainers may bill for participation in parent or guardian meetings when the meeting directly supports the student's Pre-ETS plan, progress, engagement, or service alignment. Meetings must be student-centered and documented as part of service delivery.

24. Participation in IEP Meetings

Skills Trainers may bill for only those portions of IEP meetings that directly address Pre-ETS planning, coordination, progress, or service needs. Documentation must include the meeting's purpose, Pre-ETS objectives, participants, action items, and the specific duration of Pre-ETS-related discussion.

25. Coordination with School Personnel

Meetings with school staff are billable when they directly support a specific student's Pre-ETS services, including planning, progress monitoring, strategy development, and transition coordination. Each meeting must be documented with goal, objective, summary, participant list, timing, and connection to an authorized Pre-ETS activity.

Pre-ETS Activity Classification Chart

1. Required Pre-ETS Activities

These **five activities** are the *only* categories allowable for billing under fee-for-service.

Required Activity	Allowable (Billable) Examples	Non-Allowable Within This Category
Job Exploration Counseling	Interest in inventories, career speakers, labor market research, exploring non-traditional employment options	Job search assistance, resume writing, employer applications (these are VR services, not Pre-ETS)
Work-Based Learning Experiences	Job shadowing, informational interviews, volunteering, paid or unpaid work experiences, workplace tours	Pre-placement training, job coaching for competitive integrated employment, onboarding/new hire orientation
Counseling on Enrollment in Post-Secondary Education	College tours, FAFSA guidance, admission planning, accommodations guidance, academic planning	Recreational campus activities, travel time, tutoring, ACT/SAT test prep
Workplace Readiness Training	Soft skills, communication, financial literacy, travel skills, social/interpersonal skills, independent living skills	Supervising social/recreational activities, general childcare/behavioral supervision, travel or hallway escorting time
Instruction in Self-Advocacy	Disability disclosure training, rights, and responsibilities, leadership, problem-solving, self-determination, peer mentoring	Mental health counseling, behavioral therapy, personal counseling unrelated to employment/education

Billing requirement:

Providers **may only bill** when **direct instruction** is occurring and the **student is meaningfully engaged**.

2. Coordination Activities (Not Billable under fee-for-service)

These are recognized under WIOA but **cannot** be billed by providers.

Coordination Activity	Examples (Non-Billable)	Reason Non-Billable
Interagency Collaboration	Meeting with schools to explain services; scheduling Pre-ETS groups; communicating with Child Study Teams; partnership meetings	Considered “coordination,” not direct student service

Identifying Potentially Eligible Students	Supporting referrals, sharing forms, speaking with schools to identify students, gathering disability documentation	Providers cannot bill for recruitment, intake, or eligibility-related activities
Consulting with DVRS Counselors	Updating DVRS on student progress, attending planning meetings when no active instruction occurs	Required collaboration but not direct service
Staff Training & Preparation	All Things Pre-ETS training, curriculum planning, lesson preparation, professional development	Preparation time is included in provider rate; not billable
Scheduling & Logistics	Setting up classrooms, emailing teachers, obtaining permissions, arranging transportation for tours	Administrative, not instruction
Family Engagement Not Tied to a Specific Lesson	General family meetings not tied to specific Pre-ETS objectives	Only parent meetings directly supporting instruction are billable

Billable exception:

A meeting (parent, school, counselor) *may* be billable only if it directly supports **a required Pre-ETS activity for a specific student**.

3. Non-Allowable Activities (Never Billable)

The following are non-allowable billing activities, with WIOA/RSA required explicit examples.

Category of Non-Allowable Activity	Examples (Never Billable)	Source Alignment
IEP-Mandated Services/IDEA Responsibilities	Transition services required in an IEP; school-funded work experience; classroom instruction Rule: If it is written into the IEP, schools must provide it, Pre-ETS cannot bill for it.	Pre-ETS cannot supplant school responsibilities: transition assessments required by the IEP (e.g., interest or aptitude testing required by IEP); work-based learning placements required by the IEP; job coaching provided as part of an IEP-mandated school-based program; life skills instruction required by the IEP (e.g., daily living skills built into curriculum); travel training required in the IEP (orientation & mobility services provided by school

		staff); career exploration tasks assigned as part of a transition course or curriculum, and; counseling or social skills instruction written into the IEP
VR Services	Job placement, resume development, interview practice, job coaching, onboarding, benefits counseling	WIOA prohibits billing VR services under Pre-ETS
Transportation & Travel Time	Travel to/from college tours; transporting students; waiting for students in hallways	WIOA/ RSA/ TAC-17-01 compliant 1. Travel time is never billable, as this is not considered direct service. This applies to travel to or from any service location; traveling between school sites; traveling during community-based lessons, and; transportation for college tours or work-based learning experiences 2. Providers may not transport students. Transportation is the responsibility of the school; the family; district transportation services, and; another authorized entity. Pre-ETS providers may not: drive students in personal or agency vehicles; arrange rides; pay for transportation except under a <i>separate VR service category</i> (not Pre-ETS)

		3. Supervision only time during transportation is not billable. This is considered non-instructional supervision. Examples: riding the school bus with students; sitting on a bus during a field trip; escorting students between buildings, and; waiting at bus loops or pickup/dropoff points 4. Transition between locations is not billable unless instruction continues. Billable only if the Skills Trainer continues documented, meaningful Pre-ETS instruction while walking. Examples of non-billable transitions: walking students from classrooms to cafeteria; moving students from school lobby to van; escorting students to a job site, and; standing in hallways while students move 5. Providers cannot bill for time spent waiting for students, as this is not a direct service. Examples: waiting for late bus; waiting for the teacher to release the student; waiting
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		in the school office, and; waiting in a car or lobby 6. Travel required to complete the required Pre-ETS activity is allowable structurally, but not billable. WIOA allows providers to take students into the community for: workplace tours; job shadows; informational interviews; college visits, and; volunteer sites However: only the instructional portion is billable; travel to/from sites are never billable, and; social activities embedded in a tour (recreation, meals, campus entertainment) are not billable
Supervision or Non-Instructional Time	Watching students eat lunch, hallway monitoring, behavior-only management, downtime	Not active instruction; not billable
General Tutoring or Academic Instruction	Help with homework, academic remediation, literacy instruction	Not tied to Pre-ETS
Personal Counseling/ Mental Health Support	Emotional support unrelated to Pre-ETS participation; crisis management	Only emotional regulation <i>linked to participation</i> is billable
Social/ Recreational Activities	Bowling, parties, dances, pep rallies, or any social event during a “college tour”	Non-billable as social/ recreation
Provider Marketing or Outreach	Presenting Pre-ETS activities to a school	These are coordination activities only

	district; development of partnerships; recruitment	
Non-approved Service Topics	Delivering Pre-ETS session outside a student's authorized category	Providers are only allowed to deliver services they are authorized for

Documentation Requirements for Pre-ETS Delivery (RSA Required)

In addition to maintaining a complete physical case file for each student, providers delivering Pre-ETS under fee-for-service must comply with all RSA documentation requirements. These requirements ensure that every billed service can be verified as allowable, allocable, reasonable, necessary, and compliant with WIOA and RSA TAC-17-01.

Provider must document **how, when, where, and for how long** each Pre-ETS activity was delivered, including clear evidence of meaningful student participation and student-specific outcomes. The following elements must be included for **each** Pre-ETS session delivered, regardless of format.

Required Documentation for All Pre-ETS Sessions

Each activity report must include:

- a. Date of Service Delivery
The exact date the instruction occurred must be recorded.
- b. Start and End Times (Duration)
Record the precise length of time the student received direct instruction.
Travel time, wait time, or supervision time cannot be included.
- c. Mode of Service Delivery
Identify the delivery method: In-person, virtual (e.g., Zoom, Google Meet, Teams), hybrid.
- d. Location of Service Delivery
Specify the exact location, such as school classroom, community site (business, college, worksite), virtual platform.
- e. Pre-ETS Service Category
Specify which of the five required Pre-ETS activities the session addressed.

Required Documentation for Individual Services

For individual sessions, the documentation must include:

- a. Description of Instruction or Activities Provided
Detail the specific lesson delivered and instructional methods used.
- b. Student Responses to Progress
Document how the student engaged, including performance, understanding, or barriers.

c. Any Differentiated Supports Used

Examples: visual supports, scaffolding, modeling, alternative communication, additional prompting.

Documentation of Lesson Content and Objectives

Each Pre-ETS activity report must clearly include:

- A lesson goal
- At least one measurable objective
- Activities aligned with the Pre-ETS category
- Instructional strategies used
- Student performance relative to the objective

Documentation Requirement for Virtual Services

When providing virtual services, the following must be recorded:

- Platform used
- Student login time and logout time
- Evidence of engagement (chat responses, turning pages, responding to prompts)
- Attendance screenshot, chat log, or platform attendance report (when available)

Documentation Requirements for Community-Based Instruction

When instruction occurs off-site (workplace tours, job shadows, college visits), documentation must include:

- The specific learning activities conducted
- How the student engaged at each location or station
- Any pre-training or post-training delivered
- A clear distinction between billable instruction and non-billable travel or supervision

Documentation to Support Compliance with Non-Supplanting

Providers must document that:

- The activity is not required in the student's IEP
- The service does not duplicate school-funded transition services
- The school is not responsible for providing the activity under IDEA
- The provider's service supplements rather than replacing school obligations

Documentation of Student Participation in Group Services (RSA Requirements)

When Pre-ETS are delivered in a group setting, RSA requires documentation that demonstrates **individualized participation**, not just attendance. Attendance alone does

not meet the definition of direct services under WIOA or TAC-17-01, and group minutes may only be billed when each student is meaningfully engaged in the authorized Pre-ETS activity. To ensure compliance, providers must document the following elements for every group session:

1. Attendance Does Not Equal Participation

Providers must record which students attended, but they must also document **how each student participated**. Students cannot be billed simply because they were present in the room or logged onto a virtual platform.

Examples of *non-billable attendance only*:

- A student sitting in the room but refusing all interaction
- A student logged into a Zoom session with no engagement
- A student present but off task with no response to prompts

2. Required Evidence of Meaningful Engagement of Each Student

The provider must document **individualized engagement** that demonstrates the student was actively participating in the lesson. Examples include:

- Verbal responses during instruction
- Non-verbal responses (nodding, eye contact, gestures)
- Participation through chat or text in virtual settings
- Responding to prompts or questions
- Participating in differentiated or individualized activities

3. Documentation of Group Size and Attendance Method

Providers must document:

- **Total group size**
- **Each student's attendance method**, such as:
 - In-person
 - Virtual (camera, audio, chat)
 - Telephone
 - Alternative communication method

Note: This information must appear on the service documentation or activity log.

4. Individual Participation Notes

RSA monitoring guidance requires a **student-specific participation statement** for every group session, such as:

- “Student participated verbally in group discussion regarding workplace behaviors.”
- “Student engaged non-verbally by pointing to correct answers and completing the worksheet.”
- “Student responded to prompts through chat and answered all self-advocacy questions.”

- “Student required one redirection but reengaged and completed the activity.”

Note: Generic statements like “group participated in lesson” or “students worked on activity” **do not meet RSA requirements**.

5. Documentation of Individualized Time (When Applicable)

If students receive different activities or individualized instruction within a group session, providers must:

- Document **time spent per student**
- Document the **specific content** each student received

6. Virtual Group Sessions

Documentation must include:

- Platform used (Zoom, Google Meet, Teams, etc.)
- Student joining and leaving times
- Evidence of active engagement (chat responses, screen interaction, participation)
- Any participation barriers (camera off, technology issues), with notes explaining how the trainer ensured participation

Transportation and Travel Time Restrictions (RSA Requirements)

Under WIOA and RSA regulations, transportation, travel, and non-instructional supervision are **not allowable** Pre-ETS billable activities. While Pre-ETS may occur in the community, DVRS may only reimburse for the **direct instructional portion** of the activity. Travel and supervision time do not constitute direct service and must not be billed.

The following requirements apply to all Pre-ETS activities, whether delivered individually or in a group:

1. Travel Time is Never Billable

Providers may not bill for:

- Travel to or from a school, worksite, college campus, or community location
- Travel between multiple service locations
- Travel during workplace readiness or work-based learning activities
- Staff driving to pick up or drop off students
- Staff travel to virtual or in-person meetings

2. Providers May Not Transport Students

Providers may not:

- Drive students in agency or personal vehicles
- Arrange transportation on behalf of students
- Pay for student transportation using Pre-ETS funds
- Supervise students in vehicles

3. Moving Students Between Locations is Non-Billable

Time spent escorting, supervising, or accompanying students is not considered instructional. Examples include:

- a. Walking students from a classroom to the bus or cafeteria
- b. Moving students through hallways to reach the next location
- c. Escorting students during transition periods
- d. Supervising students during transitions to work-based learning sites

Note: These activities may be necessary but are not part of direct Pre-ETS service delivery.

4. Waiting Time is Non-Billable

Providers may not bill for:

- a. Waiting for students to arrive or be dismissed from class
- b. Waiting for school staff to release students
- c. Waiting for transportation or bus arrivals
- d. Waiting during emergencies, drill, or delays

Note: Only direct instructional time is billable.

5. Supervision-Only Time is Non-Billable

Supervision is not a Pre-ETS activity. Providers may not bill when:

- a. Students are eating lunch
- b. Students are walking to classes
- c. Students are waiting for transportation
- d. Students are being monitored for safety or behavior unrelated to instruction

Note: Billing may resume only when the provider and student re-engage in **meaningful, goal-directed Pre-ETS instruction.**

6. Community-Based Instruction Must Clearly Separate Billable vs. Non-Billable Time

Documentation must show:

- a. When instruction began and ended
- b. When travel occurred
- c. When supervision occurred
- d. When the student was engaged in learning activities

Billable time includes only:

- e. Instructional activities
- f. Guided skill development
- g. Structured exploration activities
- h. Direct coaching related to Pre-ETS goals

Non-billable time includes:

- i. Transportation, travel, or transit
- j. Breaks, transitions, waiting, or unstructured supervision

To receive payment for services, the provider must:

1. Complete the approved DVRS Pre-ETS delivery report for each service received by the student beginning with the summary activity log on each reporting form and upload the report to the DVRS Counselor.
2. Pre-ETS delivery reports must include a minimum of 4 activities related to the specific service provided.
 - a. All Pre-ETS delivery reports will be reviewed and approved for payment by the DVRS Counselor.
 - b. Once a report is approved by the DVRS Counselor, additional fee-for-service authorizations will be sent to the agency upon request noted in the report.
 - c. If a report is not approved by the DVRS Counselor, it will be returned to the agency with notable issues.
 - d. Once the agency has made corrections to the rejected report, it should be resubmitted for approval as soon as possible.
 - e. The agency and the DVRS Counselor should work closely together to ensure the agency submits quality reports and they are also able to promptly correct and resubmit rejected reports.

Note: Authorizations are valid for six months from the date of issue. Please note that any authorizations not submitted within the six-month period will be cancelled.

Non-Supplanting Requirements (WIOA & RSA TAC-17-01)

Pre-ETS funds may **supplement**, but may **not supplant**, any service that a school district is legally responsible for providing under the Individuals with Disabilities Education Act (IDEA), Section 504, or state education regulations. Pre-ETS activities must not replace transition services, evaluations, coursework, or support that are required to be delivered by the Local Education Agency (LEA).

Definition of Supplementing vs. Supplanting

Supplementing (Allowed)

Supplementing means Pre-ETS adds to, enhances, or expands school transition services only after the school has met its IDEA responsibilities. Pre-ETS may deepen learning, provide additional practice opportunities, or offer community-based experiences not otherwise provided by the school.

Supplanting (Not Allowed)

Supplanting occurs when Pre-ETS replaces, duplicates, or stands in for a transition service that the school is **mandated** to provide. If a service is listed in the IEP, or is part of the school curriculum, Pre-ETS funds cannot be used to deliver it. Federal regulation requires that VR

agencies ensure Pre-ETS funds do not pay for any service that schools are legally obligated to provide.

Activities That Pre-ETS May Not Replace (Non-Allowable)

The following services are not billable under Pre-ETS:

- Transition assessments required by the IEP
- Job coaching or worksite supervision required in the IEP
- School-funded work-based learning programs
- Daily living, social skills, or workplace readiness instruction listed as IEP goals
- Orientation and mobility instruction included in the IEP

School Instruction or Curriculum

The following activities are not billable under Pre-ETS:

- Career education courses
- Financial literacy classes required for graduation
- Transition and employability classes
- Career and Technical Education (CTE) coursework
 - CTE are state-approved programs that provide students with hands-on, career-focused instruction in fields such as health sciences, manufacturing, information technology, automotive technology, business, and other skilled trades. CTE prepares students with the technical skills, industry knowledge, and work-based learning experiences needed for post-secondary training, apprenticeships, or direct entry into the workforce.
- Academic instruction or tutoring
- Behavioral or therapeutic support delivered by school staff

Note: If the school provides it as part of its curriculum, Pre-ETS cannot pay for it.

School Responsibilities Related to Transition Planning

The following activities are not billable under Pre-ETS:

- Writing the transition portion of the IEP
- Administering age-appropriate transition assessments required by IDEA
- Developing measurable post-secondary goals
- School-based case management
- Required progress monitoring
- Facilitating IEP meetings or compliance activities

Note: These duties legally belong to the LEA, not DVRS or providers.

School-Funded Transportation or Supervision

The following activities are not billable under Pre-ETS:

- Student transportation to work sites or community experiences
- Supervision during lunch, class transitions, or bus dismissal
- Escorting students around the school
- Monitoring students during non-instructional periods

Examples of Supplementing vs. Supplanting

Allowed (Supplementing)

- School offers a basic career unit, provider delivers deeper Job Exploration Counseling
- School provides one in-school work experience, provider offers additional community-based job shadows
- School teaches general self-determination, provider teaches disability disclosure and workplace accommodation strategies
- School provides CTE courses, provider adds workplace tours tied to the student's interest

Not Allowed (Supplanting)

- School lacks a work-student program, provider substitutes by arranging work experiences
- IEP requires daily living skills training; provider delivers independent living instruction using Pre-ETS funds
- IEP requires a transition assessment, provider delivers it under Pre-ETS
- School is required to provide job coaching for WBLE, provider replaces the school's job coach
- School requires financial literacy instruction, provider delivers the same content and bills it as Workplace Readiness Training
- School transportation is required, provider transports student or bills for time spent accompanying them

Provider Responsibility

Before delivering or billing for any Pre-ETS activity, the provider must ensure:

- The activity is **not required in the student's IEP**
- The school is **not already responsible** for delivering the service
- The service **expands**, rather than replaces, the school-provided transition program
- The DVRS Counselor is consulted when any uncertainty exists

Note: There must be a collaboration with DVRS to avoid duplication, which is required **non-supplanting compliance rules**.

Section 5

Tools and Resources

1. DVRS Specific Resources

- [Pre-ETS Student Referral Form \(English\)](#)
- [Pre-ETS Student Referral Form \(Spanish\)](#)
- [Pre-ETS Billable Time Decision Tree](#)
- [Meaningful Engagement Checklist](#)
- [Compliance Quick Reference Sheets](#)
- [Technical Assistance Curricular RSA-TAC-17-01](#)
- [eCFR :: 34 CFR 361.48 -- Scope of vocational rehabilitation services for individuals with disabilities.](#)

2. Job Exploration Counseling

- [NTACT:C Handout Job Exploration Counseling](#)
- **Career One Stop** (<https://www.careeronestop.org/default.aspx>) sponsored by US Department of Labor provides career profiles, self-assessments, and tools for planning careers.
- **NJ CAN** (<https://portal.njcis.intocareers.org>) sponsored by NJ Department of Education and Department of Labor and Workforce Development provides career profiles, interest inventories, career exploration, labor market information, and employment leads.
- **My Next Move** (<https://www.mynextmove.org>) is a career exploration tool designed for use by students to learn about careers and match their interests to career options.
- **Occupational Outlook Handbook, US Department of Labor, Bureau of Labor Statistics** (<https://www.bls.gov/ooh/>) helps individuals find career information on duties, education and training, pay, and outlook for hundreds of occupations.
- **O*Net Career Exploration Tools** (<https://www.onetcenter.org/tools.html>). The O*NET Program is the nation's primary source of occupational information. It provides sets of self-directed career exploration/assessment tools to help students who are exploring school-to-work transition with planning career options.
- **National Technical Assistance Center on Transition: The Collaborative** ([NTACT:C | National Technical Assistance Center on Transition](#)) provides guidance and resources on all five required Pre-ETS activities.

3. Work Based Learning Experience

- [NTACT:C Handout WBLE](#)

- **Explore-Work.com** (<https://explore-work.com>) a series of web-based modules specific to the five required WIOA Pre-ETS activities for use with students with disabilities.
- **T-Folio** ([Work-Based Learning Experiences | Unit 3 | T-Folio](#)) A free transition portfolio tool for high school age students with disabilities. Work-based learning experience is one of the units in this online tool, and it includes lessons on informational interviews and job shadowing.
- **Pathways to the Future** ([Pathways to the Future - Print Materials](#)) facilitates purposeful implementation of secondary transition requirements.
- **Massachusetts Work Based Learning Plan** ([Courses and Learning Experiences - College, Career and Technical Education](#)) designed to provide structure and depth to work based learning experiences. The Plan includes a job description, list of skills, and reviews. It can be completed as pen-and-paper document or through online WBLP.

4. Counseling on Enrollment in Post-Secondary Education

- [NTACT:C Handout Counseling on Enrollment in Post-Secondary Education](#)
- **Think College** ([Home page | Think College](#)) provides resources and training on post-secondary education options.
- **Guidance and Career Counselors' Toolkit- Advising High School Students with Disabilities on Post-Secondary Options** ([HEATH.8C](#)) This 192 page resource contains answers to counselors' most frequently asked questions about post-secondary opportunities for students with disabilities. Students and their families are encouraged to use the toolkit to help guide their transition planning for college and career. This online toolkit has been vetted by U.S. Department of Education.

5. Workplace Readiness Training

- [NTACT:C Handout Workplace Readiness Training](#)
- **Social Security Red Book- Work Incentives and Planning Assistance** ([The Red Book - A Guide to Work Incentives | SSA](#)) updated annually, the Red Book, serves as a general reference source about the employment-related provisions of Social Security Disability Insurance and the Supplemental Security Income Programs for educators, advocates, rehabilitation professionals, and counselors who serve people with disabilities.

6. Instruction in Self-Advocacy

- [NTACT:C Handout Instruction in Self-Advocacy](#)

- **I'm Determined** ([Homepage - I'm Determined](#)) provides resources and videos for educators, parents, and students.
- **Job Accommodation Network** ([JAN - Job Accommodation Network](#)) provides information about accommodations in the workplace.
- **Progress Monitoring Toolkit** ([Student Progress Monitoring Toolkit - NTACT:C](#)) links to external resources based on researched concepts of self-advocacy and self-determination, useful for implementing instruction in self-advocacy.
- **Self-Advocacy and the Transition to College** ([Transition to College](#))

7. Competitive Integrated Employment

- **Competitive Integrated Toolkit** ([Competitive Integrated Employment Toolkit](#))
- **Quick Guide: Competitive Integrated Employment** ([Quick Guide: Competitive Integrated Employment - NTACT:C](#))

8. Transition to Post-School Outcome Resources

- **Transition Tips to Start Your Year Off Right** ([Transition Tips to Start Your Year Off Right - NTACT:C](#))
- **Best Practices in Planning for Transition Training Module** ([Best Practices in Planning for Transition Training Module - NTACT:C](#))
- **Predictors of Post School Success** ([Predictors of Post School Success Level of Evidence Chart - NTACT:C](#))
- **Transition Across the Lifespan** ([Transition Across the Lifespan - NTACT:C](#))
- **Side By Side View: Transition Services** ([Side By Side View: Transition Services - NTACT:C](#))
- **Career and Technical Education & Secondary Students with Disabilities Quick Guide** ([Career and Technical Education & Secondary Students with Disabilities Quick Guide - NTACT:C](#))