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**Defining Quality Pre-Employment Transition Services in the Vocational Rehabilitation Program**

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**Introduction:**

The Workforce Innovation and Opportunity Act (WIOA) amends the Rehabilitation Act of 1973 and currently mandates states reserve a minimum of 15% of the Vocational Rehabilitation (VR) grant for pre-employment transition services (Pre-ETS). While Pre-ETS are aimed to improve post-school outcomes of students with disabilities, the restricted focus on a fiscal reserve as the sole performance measure of these services, has led to challenges. States struggle to meet the 15% reserve minimum, risking programs and fiscal penalties from the Rehabilitation Services Administration (RSA). These challenges are fostering an emphasis on quantity of services over the crucial aspect of service quality that leads to positive post-school outcomes for students with disabilities.

**Recommendations:**

While the success of Pre-ETS service provision is currently measured solely by VR programs’ ability to meet the 15% fiscal reserve, adjustments to the Pre-ETS performance measure are proposed to capture the qualitative impact of these services in addition to the fiscal measure. Recommendations include aligning VR policy language with the Individuals with Disabilities Education Act (IDEA), negotiating measures based on evidence-based practices or predictors of increased future earnings, and expanding allowable Pre-ETS expenditures to include community outreach, sustained engagement planning, and program development.

**Aligning VR Policy Language with IDEA:**

Harmonizing transition service definitions between IDEA and VR policy is essential for eliminating confusion on entity roles and responsibilities around service provision. In addition, enhancing collaboration between VR and federal and state education partners would allow services provided by each entity to better meet the needs of students with disabilities in a more coordinated and systemic manner. States should be allowed to engage with education partners in the alignment of IDEA and VR policy at the federal and state level, while working closely with the national VR technical assistance centers and RSA. Aligning VR policy with IDEA could lead to increased student engagement in Pre-ETS.

**Negotiated Measures Based on Evidence-Based Practices:**

Highlighting evidence-based predictors of post-school success, such as participation in Career and Technical Education (CTE) and paid employment/work experience, should guide negotiated performance measures for Pre-ETS. Drawing from research findings and Department of Education initiatives, states can negotiate measures focused on meaningful outcomes for transition youth.

Mazzotti et al compiled a literature review to explore past findings around predictors of post-school success. Some of those areas are directly connected to predictor of future employment and some are related to other areas of life. There are a handful of evidence-based practices that support success in employment after secondary school. This literature review can help point to areas, more qualitative in nature than the 15% Pre-ETS reserve mandate, that can help predict future employment success.

Participation in Career and Technical Education (CTE) is identified as a research-based predictor of postschool employment.

"Paid employment/work experience was identified as a promising predictor of post-school independent living and a research-based predictor of post school education and employment. Examples of paid employment/work experience from contributing studies included working for pay in the community (Simonsen & Neubert, 2013) and being employed prior to exiting high school (Rabren et al., 2014)."

Student support was identified as a research- based predictor of postschool employment …Examples of student support from contributing studies included students with disabilities (a) receiving career counseling, (b) obtaining help finding a job, (c) training for job skills, or (d) acquiring vocational education services at any time in high school (Cmar,2015; Daviso et al., 2016; Rojewski et al., 2014)

In addition, there were 3 interesting areas as promising predictors of post-school success. "Psychological empowerment (i.e., belief in the relationship between actions and outcomes), a component of self-determination, was identified as a promising predictor of postschool education, employment, and independent living (Petcu et al., 2017; Shogrenet al., 2017)…self-realization (i.e., having an understanding of one’s strengths and support needs), another component of self-determination, was a promising predictor of post school employment and independent living (Shogren et al., 2017)… Finally, technology skills (i.e., computer competence, computer skills) were identified as a promising predictor of postschool employment."

(https://www.ed.gov/raisethebar/postsecondary-pathways) Recently, the Department of Education published an article touching on Postsecondary and Career Pathways. One of the evidence-based areas of focus is specifically on Work Based Learning, indicating the Department hopes to continue to expand these opportunities for youth amongst other information.

The National Technical Assistance Center on Transition: The Collaborative (NTACT:C) has been reviewing data around the influence of various factors on employment outcomes. They recently ran a linear regression analysis looking at the influence of individual demographics, employment, influencers, credential attainment, and pre-employment transition services on wages two quarters after exit for transition youth 14-24 at application and who exited between April 2021 and March 2022. After preliminary analysis, overall, both credential employment and pre-employment transition services were associated with higher wages two quarters after exit. Credential attainment was consistently associated with higher wages. While pre-employment transition services were associated with higher wages it was less than the wage gains associated with credential attainment and was only observed in seven states. There were also states who, in the preliminary data, showed a negative impact to wage gains when they had received pre-employment transition services.

Evidence-based predictors of post-school success.

**Support for Community Outreach and Program Development:**

Recognizing the need for both rapid and sustained consumer engagement, this paper advocates for allowing Pre-ETS expenditures on community outreach, sustained engagement planning, and program development. Supporting states in dedicating resources to innovation within Pre-ETS services ensures adaptability and responsiveness to evolving needs.

RSA recently issued a guidance that discussed the need for both rapid and sustained consumer engagement. The VR program model is over 100 years old at this point. Realistically, for there to be big change states need to be able to dedicate resources toward program development, community outreach focus and efforts and planning around how to actually execute sustained engagement. Lehy, et al points out, "In this era of empowerment, accountability, and constrained budgets, state VR agency administrators need to transform the business models of their agencies by adopting organizational innovations and harnessing advances in information and communication technologies to deliver outcomes to individuals, communities and society at large that are of significant value (Ditchman et al., 2013; Technology and Entrepreneurship Center at Harvard, 2010)." The inclusion of more importance being placed on evidence-based practices supports, "emphasis of VR in the future will be on the meaning of research findings to practitioners and consumers in improving services, interventions, and employment outcomes for persons with disabilities, and translating and disseminating EBP that come from research efforts to the level of the organization that will affect and inform practice and policy. The development of theory-driven or model-driven research to inform best practices in rehabilitation will undoubtedly be highly important as professionals in the field strive to improve the effectiveness of VR services and outcomes, especially for subpopulations of VR consumers with the poorest rehabilitation outcomes (Chan et al., 2009). States increasing the ability to charge staff activities in support of program development and improvement to the 15% goal would be a great step forward in showing support of and encouraging creativity and change to provide better services to transition youth. Applicant numbers for the VR program have been steadily decreasing. Lack of community knowledge of VR services and state’s ability to dedicate staff resources to innovation within Pre-ETS services is a detriment to individuals with disabilities that would like to work and to the VR program.

The goal should be to create a more seamless service where IDEA and The Americans with Disabilities Act (ADA) intersect. Language in WIOA then adds another framework into the mix which creates more red tape that can impede individuals from even seeking services.

Balance of quality and quantity. The quality of services will drive the quantity. Students served in the potentially eligible (PE) category are not tracked in the same way, but it doesn’t mean the quality was not there. In many cases the smaller doses and earlier exposure to work leads to outcomes and not needing greater services in the future.

How do we negotiate performance for the PE cases? Is it providing a certain percentage of PE students a service throughout the state? States have been able to adjust to serve additional students and develop a pipeline of referrals through the potentially eligible framework. However, with potentially eligible the later cases do not always materialize, and we are unable to track student success or not after they exit. Based on information provided by subject matter experts with NTACT:C, it seems that PE students by and large are in a "parking lot" and are not receiving much in the way of PE services and do not tend to transition to a full VR case.

(https://eric.ed.gov/?q=sourcex%3A%22Journal+of+Policy+Analysis+and+Management%22&id=EJ1362575) A small study conducted with students in Maine highlighted better outcomes when potentially eligible youth had an IPE and received VR services as with a regular case. This would indicate a benefit to states developing a process to get PE students into full cases as soon as possible.

Quality performance measures on employment, post-secondary, occupational training. Some of these may include programs that are not the traditional standards measure for certifications. While not traditionally nationally recognized, credential could still be a success and large accomplishment for individuals. Especially those in the intellectual/developmental disability (IDD) population. Providing the skills and training to be successful in a competitive environment.

Twenty-nine states recently received the RSA 107 letter for not meeting the minimum reserve of 15% of Pre-ETS expenditures. In 2021, 48% of states did not meet the goal. Emphasize the WHY – 15% expenditure requirement doesn’t measure quality outcomes/services for students. This is only a fiscal measure, doesn’t reflect quality outcomes for Pre-ETS, gives perception that Pre-ETS is a separate program and not part of the continuum of services. While 48% of states did not meet the spending goal, preliminary data from NTACT:C linear progression looking at wage gains have seen an overall positive connection between students receiving Pre-ETS transition services and an increase in wages after exit. So, states are doing something right. If the 15% is not a reliable measure of Pre-ETS performance, there is an argument for incorporating other measures of quality from existing collected metrics and documents.

**Conclusion:**

In conclusion, relying solely on a fiscal performance measure to determine the success of Pre-ETS is insufficient. The focus on Pre-ETS has been one of quantity of services over quality of services in order to avoid federal non-compliance penalties. Qualitative measures are essential for identifying the true impact of Pre-ETS services. The recommendations in this paper aim to align policy language at the highest level intended to foster a more holistic approach that balances both the quality and quantity of Pre-ETS, ensuring meaningful outcomes for students with disabilities.

**References:**

[NTACT:C | National Technical Assistance Center on Transition (transitionta.org)](https://transitionta.org/)

[Pre-Employment Transition Services Implementation Checklist | WINTAC](https://www.wintac.org/topic-areas/pre-employment-transition-services/resources/pre-ets-implementation-checklist)

[State Vocational Rehabilitation Services Program | Rehabilitation Services Administration (ed.gov)](https://rsa.ed.gov/about/programs/vocational-rehabilitation-state-grants)