# Vocational Rehabilitation Services Manual C-1300: Transition Services for Students and Youth with Disabilities

Revised September 10, 2018

## Introduction

TWC-VR provides transition services to eligible students and youth with disabilities who are between the ages of 14 and 22 years old. Students and youth with disabilities under the age of 14 and served on specialized caseloads, who were made eligible for VR services prior to September 30, 2017, can also receive transition services.

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## C-1305: Providing Transition Services

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### C-1305-6: Providing Pre-Employment Transition Services

Under the Workforce Innovation and Opportunity Act (WIOA), vocational rehabilitation (VR) agencies are required to reserve and expend a minimum of 15 percent of their federal funding solely for pre-employment transition services (Pre-ETS).

Pre-ETS activities are provided to individuals who:

* meet the definition of a student with a disability; and
* are eligible or potentially eligible for VR services.

#### Student with a Disability

Based on federal regulations (34 CFR §361.5(c) (51)), in Texas, a student with a disability is defined as an individual:

Between the ages of 14 [established by TWC consistent with authority under 34 CFR §361.5(c) (51) (i)(A)(2)] and 22 who is:

* enrolled in an educational program, which may include public schools (including charter), private schools, home schools, recognized post-secondary programs, or other recognized settings, such as the schooling provided by juvenile justice facilities;
* receiving services through the Individuals with Disabilities Education Act (IDEA) (Special Education); or
* considered eligible for Section 504 services (includes individuals who are receiving VR services).

Customers who meet the requirements above but who turn 22 years old before September 2 of the current fiscal year, no longer meet the definition of a student with a disability. For example, if a customer is 21 on September 2, he or she will meet the definition of a student with a disability until August 31 of the following year if he or she remains enrolled in a recognized educational program as described above.

Graduating seniors in high school who will not be pursuing postsecondary training, or any other type of recognized educational program after high school, cease to meet the definition of a student with a disability upon graduation from high school; therefore, these individuals are not eligible for additional Pre-ETS. Graduating high school seniors who are attending postsecondary training, or another recognized educational program, in the subsequent fall term are still considered students with disabilities and remain eligible for Pre-ETS during the gap months of the summer. For graduating high school seniors who plan to participate in postsecondary training at some point after high school, but not in the subsequent fall term, the Rehabilitation Services Administration (RSA) provides the following guidance for VR staff to maintain the individual’s student with a disability status. Four pieces of documentation are required to demonstrate that the student with a disability is enrolled in a recognized education program (length of gap time is not an issue):

* 1. Documentation that the individual with a disability graduated from secondary education;
  2. Documentation that the individual with a disability has been accepted into a postsecondary educational institution or program;
  3. Documentation of the individual’s intention or confirmation that he or she accepted the invitation to enter the postsecondary institution or program; and
  4. Documentation that the individual with a disability has been informed by the institution or program that a “seat” or “spot” is being held for the individual.

Individuals who are eligible for VR but do not meet the definition of a student with a disability can receive the same services; however, they are not counted as Pre-ETS, and the services and goods must be paid for with Basic VR funds, not Pre-ETS funds.

WIOA defines three types of Pre-ETS activities—required, coordinated, and authorized.

The five required Pre-ETS activities are:

1. Career exploration counseling
2. Work-based learning experiences which may include in-school or after-school opportunities, or experiences outside the traditional school setting (including internships), that are provided in an integrated environment to the maximum extent possible
3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
4. Workplace readiness to develop social skills and independent living
5. Instruction on self-advocacy, including peer mentoring

The four coordinated Pre-ETS activities are as follows:

1. Attending individualized education plan (IEP) meetings, when invited
2. Working with the Local Workforce Development Boards (“Boards”), Workforce Solutions Offices, and employers to develop work opportunities for students with disabilities
3. Working with schools to coordinate and ensure the provision of Pre-ETS
4. Attending, when invited, individual-centered planning meetings for students with disabilities who receive services under Medicaid (Title XIX of the Social Security Act)

Texas Workforce Commission (TWC) state office and regional staff work primarily to provide the nine authorized activities. Field staff and other staff may sometimes be asked to assist with these activities.

The nine authorized Pre-ETS activities are as follows:

1. Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces
2. Developing and improving strategies for individuals with intellectual disabilities and/or significant disabilities to live independently, participate in postsecondary educational experiences, and obtain and retain competitive integrated employment
3. Providing instruction to VR counselors, school transition staff, and others who support students with disabilities
4. Disseminating information about innovative, effective, and efficient approaches to achieving WIOA goals
5. Coordinating activities with transition services provided by local education agencies (LEAs) under IDEA (20 USC §1400 et seq.)
6. Applying evidence-based findings to improve policy, procedure, practice, and staff preparation, to better achieve WIOA goals
7. Developing model transition demonstration projects
8. Establishing or supporting multistate or regional partnerships that involve states, LEAs, designated state units, developmental disabilities agencies, private businesses, and other participants to achieve WIOA goals
9. Disseminating information and developing strategies to improve the transition to postsecondary activities for individuals who are members of traditionally unserved populations

In the final WIOA regulations, the RSA clarifies that Pre-ETS is a set of services intended to occur in the earlier phases of the career exploration and work preparation continuum. This is important to remember, as Pre-ETS can be provided or purchased for students with disabilities at any point in the VR process. For students who reach active services status, Pre-ETS activities must be based on the needs identified in the IPE. The primary focus is on experiences and learning opportunities for students with disabilities.

#### Funding

Purchases for customers and students are made with either Basic VR or Pre-ETS funding, depending on the type of purchase. VR Guidance Memorandum GM 18-07 Pre-ETS Purchasing Guidance and Menu of Services (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-07-attach-purchasing.docx>) provides additional explanation and guidance for staff on what is funded by Basic VR and what may be funded by Pre-ETS. For eligible students receiving VR, it is also important to note that it may be necessary to access both Pre-ETS funding and Basic VR funding. Staff members are encouraged to “braid” different types of funding to help the student achieve his or her vocational goal. For example, an eligible VR student is participating in a workplace readiness activity but needs hearing aids to ensure effective communication. Pre-ETS funds can pay for the workplace readiness activity but not the hearing aids, because Pre-ETS cannot fund personal assistive devices. Basic VR would pay for the hearing aids.

Staff salaries are paid by Basic VR or Pre-ETS funding, depending on the activities staff members perform.

For example, if a transition vocational rehabilitation counselor (TVRC) provides a required or coordinated Pre-ETS activity to an eligible or potentially eligible student with a disability, then the TVRC documents time spent providing the service in the TWC Time Tracking System (TTS). For additional information and guidance, see GM 18-07 Pre-ETS Time Tracking (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-07-attach-purchasing.docx>).

When uncertainty exists about whether to count an activity, staff consults with the VR supervisor or submits an inquiry to the VR Pre-ETS mailbox.

#### Working with Potentially Eligible Students

To receive Pre-ETS and be considered “potentially eligible” for VR services, an individual must meet only the definition of a student with a disability. The individual can be in the initial contact stage, with or without a caseload assignment, or the application stage, or may not have a case entered in the VR system at all. The individual does not have to apply for VR services, unless the individual chooses to do so. The purpose of the “potentially eligible” designation is to give more students the opportunity to participate in Pre-ETS. VR requirements are only required for services provided to VR-eligible customers. The only VR services provided to potentially eligible individuals are informed choice, confidentiality, and access to the customer assistance program (34 CFR §361.38, §361.52, and §361.56). Potentially eligible students are not subject to Basic Living Requirements (BLR) or other cost sharing requirements.

Students who are potentially eligible may receive a single Pre-ETS or multiple Pre-ETS according to their need and desire to participate. Providing or purchasing Pre-ETS for potentially eligible students is not intended to be an avenue to circumvent the VR process, and at some point, a potentially eligible individual may need VR services that Pre-ETS cannot fund, such as psychological assessment, durable medical equipment, transportation, or tuition. To access VR services, a Pre-ETS potentially eligible individual must apply for VR, be determined eligible, and have an Individualized Plan for Employment (IPE) for provision of the additional VR services.

If a potentially eligible student has completed the VR application process and has been determined ineligible, the provision of Pre-ETS stops, and he or she is no longer considered potentially eligible.

WIOA requires VR to document information for anyone receiving Pre-ETS activities. This is different for potentially eligible individuals than for someone who has been determined eligible for VR. The data required for a student with a disability who is requesting or participating in Pre-ETS activities and has not applied for VR services can be captured on the DARS1820 form, which includes:

* a Social Security number (preferable if available) or another unique identifier such as a student school identification number, a state-issued identification card number, or driver’s license number;
* date of birth;
* race (required if student is in secondary education);
* ethnicity (required if student is in secondary education);
* student’s disability (as indicated in supporting documentation listed below);
* start date of the Pre-ETS activity; and
* the Pre-ETS activities provided, including the type of provider and amount expended for the service (see 34 CFR §361.47 and 34 CFR §361.56).

Supporting documentation, required to verify the student’s disability, may include the following:

* Case notes documenting VR counselor observations, review of school records, and statements of education staff
* A referral form from a school requesting Pre-ETS activities with the identification of a student’s disability, signed by a school professional or parent/guardian if the student is considered a minor (parental consent to participate in Pre-ETS is governed by state law and the policies of the educational programs and the designated state unit)
* A copy of an IEP, Social Security Administration (SSA) beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination, or documentation relating to 504 accommodations

VR counselors can enter and track potentially eligible students, and issue payment for purchased Pre-ETS, in ReHabWorks (RHW). For additional assistance and guidance on purchasing for potentially eligible students, see GM 18-07 Pre-ETS Purchasing Guidance and Menu of Services document (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-07-attach-purchasing.docx>).

#### Capturing Pre-ETS Activity in ReHabWorks

In addition to tracking Pre-ETS staff time and funding, it is essential to capture and document the number and type of substantial Pre-ETS being provided to each student by entering a provided services *Service Record (SR)* in RHW.

For purposes of identifying the required and coordinated Pre-ETS being provided by staff, an SR is generated for services that are arranged, provided, and/or purchased for the student via the Workforce Reporting Accounting and Procurement System (WRAPS).

Caseload-carrying staff members (or their support staff) must create service records within seven days of the provision of a required or coordinated Pre-ETS. For example, a TVRC meets with a high school student to discuss postsecondary options and the related actions needed to prepare for transitioning to postsecondary training. A case note is entered in RHW to document the counseling and guidance that occurred, and an SR is entered to document the specific Pre-ETS provided (that is, Counseling on Postsecondary Options).

For more information and examples of entering Pre-ETS SRs, see [VRS-RHW Support Page](http://teamnet.dars.txnet.state.tx.us/drs/VRSRHWSupp/Forms/AllItems.aspx?View=%7BBD8E2512%2DDEEF%2D4061%2DA984%2D254C1E3E89BE%7D) [VR RHW Support Resources](http://teamnet.dars.txnet.state.tx.us/drs/VRSRHWSupp/Forms/AllItems.aspx?RootFolder=%2Fdrs%2FVRSRHWSupp%2FVR%20RHW%20Support%20Resources&FolderCTID=0x012000FF896392286952418C3620450A9AE239&View=%7BBD8E2512%2DDEEF%2D4061%2DA984%2D254C1E3E89BE%7D).

### C-1305-7: Additional Group Skills Training—Vocational and Work Readiness

Transition services provide a wide variety of training to help students with disabilities obtain the skills and experience they need to prepare for and make informed choices about whether and where to work and/or obtain a postsecondary education and where and how to live in the community.

Students who can benefit are given opportunities to participate in group skills training, workshops, camps, and seminars. Families may also be included in opportunities when their participation supports the student's VR needs. The opportunities provided vary by state fiscal year, region, and the customers' needs. (See C-1305-11: Group Skills Training.)

### C-1305-8: Temporary Learning Experience

Temporary learning experiences include Pre-ETS-funded activities such as camps, seminars, workshops, and conferences. Often the activities are single purchases made when a TVRC identifies a single experience that would benefit a student or a small group of students. The experiences are designed to be short-term and last no longer than 13 weeks, unless there is an exception.

Before purchasing a temporary learning experience, the TVRC contacts the state office transition specialist by email at [vr.pre-ets@twc.state.tx.us](mailto:vr.pre-ets@twc.state.tx.us). The activity must focus on at least one of the five required Pre-ETS areas. See C-1305-6: Providing Pre-Employment Transition Services for more information.

The email from the TVRC must identify the:

* Pre-ETS areas that will be addressed;
* the cost; and
* the activities.

### C-1305-9: Camps

Camps can increase a student's self-confidence by providing opportunities for the student to participate in challenging activities. Camps generally focus on career exploration activities or increasing the student's vocational and work readiness skills to prepare the student for VR. Each camp must have clear vocational goals with associated objectives to demonstrate how the activity will meet the goals. A camp must not be a solely or predominantly social or recreational event.

Camp-related expenses can include costs that are considered Pre-ETS (such as career exploration) as well as related costs that are not considered Pre-ETS (such as customer travel, room, and board).

### C-1305-10: Workshops and Seminars

Seminars and workshops may be held for a few hours or a few days.

Topics may include focus areas such as making the transition from school to work, driving with low-vision aids, succeeding in college, and the services provided by guide dogs.

Depending on the subject, the topics may or may not be considered Pre-ETS.

### C-1305-11: Group Skills Training

At times, it is more effective for the student and more efficient for the program to bring groups of individuals with disabilities together to teach a set of vocational skills. These activities are known as Group Skills Training (GST) activities and are intended specifically for students with any disabilities (see 34 CFR §361.5(c) (51)). A GST has an agenda, defined start and end dates, and specific learning objectives. For every GST, VR staff must be able to clearly state what the students will learn and be able to accomplish after participation.

GST sessions focus exclusively or primarily on providing one or more of the following five required Pre-ETS activities (see 34 CFR §361.48(a)(2)):

* Job exploration counseling
* Work-based learning experiences, such as in-school or after-school opportunities, or experiences offered outside of traditional school settings (including internships), in an integrated environment to the maximum extent possible
* Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs
* Workplace readiness training to develop social and independent living skills
* Instruction in self-advocacy, which may include peer mentoring

GST sessions often include multiple Pre-ETS–required activities and services. GSTs are designed by VR staff. They may be conducted by VR staff and may also include other providers, such as a Community Rehabilitation Program (CRP). Often, a GST may require multiple types of purchases, and staff must follow all applicable procurement and purchasing requirements. For example, a CRP, an external speaker, and lodging each entail different purchase requirements.

To the greatest extent possible, each GST must be designed to maximize use of Pre-ETS funds and minimize the need for Basic VR funds. For example, a day program that is focused primarily on delivery of Pre-ETS activities and that uses facilities that VR can obtain at no or minimal cost maximizes use of Pre-ETS funding, while a multi-week residential program or an event that requires lodging and paid meeting space requires significant expenditures of Basic VR funds.

However, long-standing GSTs that are residential programs conducted during the summer months may still be considered for approval.

Contracts may also be required for some GST activities, requiring staff to plan for GST sessions several months in advance, to allow sufficient time for procurement, planning, and required approval. Partners may include education service centers, local colleges, Workforce Solutions Offices, Boards, the Texas School for the Blind and Visually Impaired, the Blind Children's Program under HHSC, and/or the Texas School for the Deaf.

Each GST must have clear vocational goals with associated objectives to demonstrate how the activity will meet the goals.

For example, if the GST provides workplace readiness training, the objectives may include:

* developing the orientation and mobility required to navigate a city to reach a postsecondary school;
* developing communication skills, including appropriate interpersonal skills;
* attending team building exercises in which individuals with different personalities are required to work together to create a product or achieve a result; and
* learning about appropriate work attire and etiquette.

A GST must not be a solely or predominantly social or recreational event, and the following training activities may be part of a GST, but are not GSTs when provided as stand-alone trainings:

* A mini-immersion training conducted by the Criss Cole Rehabilitation Center (CCRC)
* Classes provided by VR teachers
* Training activities provided by a CRP, such as Project Search, Vocational Adjustment Training, or Personal Social Adjustment Training

When a GST is conducted over several days or weeks, periodic recreational activities may be proposed to facilitate customer interaction and further prepare the student for the workplace (for example, focusing on social interaction, being comfortable in environments and situations that may be new, promoting leadership and problem-solving activities during team-building exercises, or emphasizing the importance of collaboration).

To the extent possible, recreational activities for students who are blind or visually impaired must be designed using the approach known as Structured Discovery Cane Travel (SDCT). SDCT instruction includes nonvisual techniques, problem-solving strategies, experiential learning, and confidence-building experiences.

Eligible students who attend a GST must have goals in their IPE that make participation in the specific GST necessary for their vocational development. If goods and services other than the required Pre-ETS activities must be purchased for the eligible student to participate in the GST, those purchases must be:

* documented in the student’s IPE;
* necessary to perform the actual activity or task, or to achieve the goal of the GST; and
* reasonable, meaning that the cost does not exceed fair or market cost for purchases made under the same or similar circumstances.

The purchase of food, clothing, or backpacks (or similar types of purchases) for any GST must comply with the definitions of “necessary” and “reasonable.”

For example:

* Food may not be purchased to feed GST participants unless the GST is scheduled to exceed five hours, not including the meal hour. GSTs should not be planned purposely over a meal period with the intent of purchasing food. Meals should only be purchased when doing so will allow students to continue their GST activities during the meal, or will support completion of the training in less time.
* Any food purchased must only be for the students, must not be an excessive quantity or variety, and must be a reasonable cost. The cost per meal should be as economical as possible and must not exceed $15 per student. When the GST spans a full day or multiple days, the daily cost per student for food must not exceed $51. Any exceptions to these limits must be approved by the division director in advance.
* Food may not be purchased to feed TWC VR staff, individuals from partner organizations, or family members. The only exception is when a family member’s participation meets the requirements established in this section and when the purchase of food for the family member is approved in advance by the Division Director.
* Food is not an allowable Pre-ETS expenditure since it is a supporting good or service. Food expenditures must be paid with Basic VR funds and should therefore be minimized.
* Clothing, backpacks, and equipment are not allowable Pre-ETS expenditures since they are supporting goods. The need for purchase of any equipment must be individualized, necessary for GST participation, and documented in the student’s IPE. Backpacks should only be purchased if truly necessary for the GST activities.
* If a T-shirt is necessary to identify students in a public setting, the T-shirts should be a reasonable cost, not embellished, and purchase must follow all applicable procurement and purchasing requirements. Documentation must be retained to justify the purchase.

#### Planning a Group Skills Training

Planning is essential for developing and providing a high-quality GST for students. Five GST planning and proposal templates have been developed to assist staff and facilitate the management approval process. Templates are designed based on the number of required Pre-ETS activities included in the GST. Templates are named by GST primary focus. The five templates, along with examples of GSTs that generally meet the requirements of these groups and that have been approved in the past, are the following:

Please note that not all previously approved GSTs are included as examples below.

* Pre-ETS STARS. (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM08-03AttachA.docx>) This GST type uses all five of the required Pre-ETS activities and usually spans a time frame of several weeks. Examples include DREAM, DayDREAM, Project DRIVE, SWEEP, and WACO.
* Work-Based Learning Plus. (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM08-03AttachB.docx>) This GST type focuses on work-based learning and uses four of the required Pre-ETS activities: work-based learning, career exploration, workplace readiness, and self-advocacy. This GST also may span a period of weeks. Examples include JOBS, WAVE, SWEAT, and WALIC.
* Postsecondary Education Plus. (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM08-03AttachC.docx>) This GST type focuses primarily on postsecondary education and uses four required Pre-ETS activities: counseling on postsecondary education, career exploration, workplace readiness, and self-advocacy. These GSTs tend to be one to two weeks long. Examples include CCRC’s College Prep, STEAM, Camp Surge, and Academic Work and Life.
* Career Preparation. (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM08-03AttachD.docx>) This GST type uses three required Pre-ETS activities and focuses on career exploration, workplace readiness, and self-advocacy. These GSTs can span a few hours to a couple of days. Examples include Carolyn Garrett Leadership Training, Robotics, and the West Texas Cluster Transition Conference.
* Focused Activity. (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM08-03AttachE.docx>) This GST type focuses on only one Pre-ETS activity and usually lasts a few hours to a full day. This is a new GST type designed to allow staff to provide in-depth training in a single Pre-ETS area.

While it is expected that most GSTs proposed by staff will fall under one of the five templates, staff may also adapt templates to propose other types of training, if proposed GSTs meet all requirements established in policy and generally follow the basic layout of the template.

When completing a GST template, staff may refer to this expanded look at the five required Pre-ETS categories in VR GM 18-03 (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-03GSTs.docx>) for examples of activities.

#### GST Approval Process

1. VR staff receives approval from the VR Manager to prepare a GST proposal for submission.
2. VR staff prepares the proposal by completing the appropriate GST template (Attachments A–E). As needed, staff coordinates with unit support team members, VR Supervisor, VR Manager, and the regional office to identify goods and services that must be procured, along with the required procurement and purchasing processes.
3. VR Manager reviews and approves the completed GST template and any supporting documentation and submits it to the Regional Director.
4. Regional Director reviews and approves the proposal and submits completed template and supporting documentation to the Pre-ETS mailbox for review.
5. Designated TWC VR State Office staff reviews the GST proposal to ensure compliance with policy and the guidance in this document and submits the template and supporting documentation to the VR Deputy Division Director for Field Services Delivery and the VR Division Director.
6. The VR Deputy Division Director for Field Services Delivery and the VR Division Director will review the proposed GST for approval. Where necessary, the VR Division Director will consult with executive management before approval.
7. The VR Deputy Division Director for Field Services Delivery will notify the Regional Director whether the GST proposal is approved or not approved.
8. The Regional Director will notify the VR Manager.
9. The VR Manager will ensure that designated VR staff implements the GST as approved, and follows all required policies and procurement and purchasing processes.

VR Managers and Regional Directors are responsible for ensuring that GST proposals are complete, accurate, and fully compliant with policy before submitting them to State Office for review and approval.

After a GST is conducted, the VR Manager is also responsible for reviewing the GST budget and planned activities to evaluate whether the activities were effective and well executed, whether the participants achieved the learning objectives, and to compare budgeted versus actual costs. The VR Manager should document the results of the review, retain them for future GST planning, and provide them to TWC and regional management upon request.

VR staff must have approval for a GST before goods and services are procured, before contracts are developed, and before commitments are made to students, families, and potential partners.

#### Approval Time Frames

If all required information is included in the initial submission, a GST may be approved by the VR Division Director within two weeks of submission to the Pre-ETS mailbox. If information is incomplete, inaccurate, or not compliant with policy, the approval process will be delayed until the proposal is revised to meet all requirements.

Staff submits GST proposals as far in advance of the proposed GST as possible. Where contracts must be executed, the contracting process must follow approval of the GST by executive management. Staff must allow at least four months for the contract development and execution process.

#### Family Member Participation

Depending on the goals of the GST, participation by parents or guardians may be essential for the student to receive the benefit of the training activities.

Family members may participate in GSTs when:

1. the GST activities are designed to include the parents or guardians as part of the skill attainment process during the GST and thereafter;
2. the primary purpose of the GST is to provide education, training, and resources to the student and parents and/or guardians; or
3. the parent must attend to to provide attendant care for a student who requires such care to participate.

If a parent's and/or guardian's participation is necessary for a GST, the TVRC and VR Supervisor must:

* consider whether more than one parent or guardian is needed to participate; and
* justify the need in the program description.

If another family member asks to participate in the GST in place of the parent or guardian, the TVRC must obtain approval from the VR Manager.

#### Budget

The VR Manager must consider the anticipated costs associated with a GST and develop a proposed budget. Most of the proposed costs would be attributed to Pre-ETS. When necessary, the budget may contain supporting costs attributed to Basic VR. The proposed budget identifies which costs are attributed to Pre-ETS and Basic VR.

#### GST Site

Facility and room rentals are typically not allowable Pre-ETS expenditures. All GST sites must be accessible, according to the standards established by the Americans with Disabilities Act (ADA). When a contract or written agreement is required to rent a room or facility, all approval and procurement processes must be followed.

#### Contracts

Contracts that are necessary for one or more GST activities must be developed with and approved by TWC Procurement and Contract Services and must comply with TWC policy and state and federal law. The VR Manager must ensure that the necessary time is allowed to execute contracts for certain training sessions, lodging, or services.

#### Lodging

Lodging costs are not an allowable Pre-ETS expenditure, so GST activities should be planned to limit the need for lodging, when possible.

When lodging is necessary for the GST, and family member participation is also proposed, the VR Manager must carefully consider whether it is necessary for more than one family member to participate.

The VR Manager must also consider that it is generally easier to supervise students in camp or dormitory settings rather than at a hotel. If more than 10 hotel rooms are needed, the VR Manager must first obtain approval from the VR Division Director and then coordinate with TWC Conference Planning at [ConferencePlanning.Media@twc.state.tx.us](mailto:ConferencePlanning.Media@twc.state.tx.us).

#### Materials

The VR Manager must allow sufficient time for the approval, printing, and mailing of outreach and other materials necessary for the GST. Materials such as brochures must provide all essential information. Applications must include mandatory signatures. All printed materials must be provided in an accessible format.

Staff may submit materials for TWC review and approval by either of the following methods:

* Completing the [Communications Service Request Form](http://intra.twc.state.tx.us/intranet/comm/docs/communications-new-service-product-request-form-twc.pdf). The form is listed under Links on the [Communications intranet page](http://intra.twc.state.tx.us/intranet/comm/html/index.html).
* Emailing the materials to [communications@twc.state.tx.us](mailto:communications@twc.state.tx.us).

With the review request, the name of the VR Manager who approved the material must be included.

#### External Presenters and Contributors

When external presenters and contributors of in-kind resources (such as free lodging or meeting space) are an option, presenters or vendors must be approved through TWC Conference Planning at [ConferencePlanning.Media@twc.state.tx.us](mailto:ConferencePlanning.Media@twc.state.tx.us).

Gifts or donations valued at $500 or more must follow TWC's procedures for the acceptance of gifts.

#### Partners

The VR Manager must allow sufficient time to work with partners who may be part of the GST. Regardless of who the partners are, the GST must meet the requirements of this policy and must focus predominantlyon required Pre-ETS activities.

#### Student Safety and Supervision

The VR Manager must ensure that there is a safety system to ensure that all students are accounted for and are transported safely. For example, the VR Manager may:

* hire a security guard, nurse (for example medication assistance), certified life guard, or licensed commercial driver, if a TVRC determines that there is a need; or
* make cell phones available in vehicles that transport students; and

The amount of adult supervision needed varies depending on the type of event and the needs of the students. When a training activity does not include parents, at least one adult must be in attendance for every six adolescent students. In some circumstances, there may be a need for a higher staff-to-participant ratio.

#### Consent Forms

Students applying to participate in a Pre-ETS GST must provide the following with their application:

* permission to participate signed by a parent or legal guardian
* A signed emergency medical release
* Emergency contact information
* Written permission for transporting the student, if travel is provided

Providing a photograph of the student is optional.

If the GST will be held overnight, students must also include the following information, when applicable:

* A list of the medications that the student takes
* A statement explaining whether the student can monitor his or her own medication
* Information about the student's medical conditions
* A list of the student's allergies (medication- or food-related)
* The relevance of the GST to the student's IPE

#### Post-GST Follow Up

Once the training is completed:

* the regions must appropriately document the results of the GST;
* the VR counselor documents the student’s participation and the GST training activities in a case note and explains how the GST is meeting the student's needs; and
* the host counselor sends a summary report to the state office program specialist for transition services within 30 days to update the proposed budget to include:
  + the projected budget;
  + the actual costs;
  + the final number of participants;
  + the name and case ID (or Social Security number) of each participant; and
  + a summary of each participant's evaluations.

### C-1305-12: GSTs that Involve More than One Management Unit and/or Region

GST sessions that will include students who are served by more than one management unit or region must be approved by the directors of the participating region or regions.

If a student from one unit or region participates in a training session that is sponsored by another unit or region, the student's TVRC may be asked to hold a staff meeting to discuss the activity; however, the TVRC's participation is contingent on approval from the VR Manager.

As with other GSTs, a description and budget for GSTs that are offered by more than one management unit or region must be submitted to the state office program specialist for Transition Services.

The state office program specialist reviews the proposed GST description and budget and facilitates final review and approval.

### C-1305-13: Summer Earn and Learn

Summer Earn and Learn (SEAL) is a statewide strategy that includes employability skills training and paid work experience for students with disabilities. It is offered in each of the 28 local workforce development areas during the summer months, when students are out of school. Participants in SEAL must meet the definition of a student with a disability, including current VR customers and those who may be potentially eligible for VR services. Most employers prefer students to be at least 16 years old to participate in work experience; however, some employers, particularly those in the public sector, may be willing to offer work experiences for younger students.

Additionally, students must meet the following conditions:

* Exhibit behavior that is appropriate for a work setting. If the student has, at times, displayed behaviors that are not work-appropriate, the student should be able to be redirected with minimal intervention.
* Be receptive to counseling and guidance about the importance of appropriate workplace behavior.
* Be motivated to participate in the work-based learning program.

If a participant in SEAL needs services to access the program or support successful participation, such as sign language interpreting or Work Experience Training, these support services can be purchased with Pre-ETS funding.

When purchasing Work Experience Services through a CRP, transition educator, or a nontraditional provider for a student participating in SEAL or a GST, the Work Experience Plan does not have to be completed.

Other support services that may be needed for some students to participate, such as transportation or maintenance, can only be purchased with Basic VR funding and cannot be provided for potentially eligible participants.

#### Social Security Beneficiaries in SEAL

VR counselors must consider the impact of earning wages during SEAL on students’ Social Security benefits and provide information, as appropriate, to aid student understanding and compliance. See VR GM 18-04 SEAL and the Student Earned Income Exclusion (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-04C-SEAL-SEIE-presentation.pptx>) for guidance on how wages will affect Supplemental Security Income (SSI) beneficiaries and Social Security Disability Insurance or Childhood Disability Benefits beneficiaries. For information on the Student Earned Income Exclusion for SSI beneficiaries, including how to submit relevant documentation to SSA, see VR GM 18-04 Request for Student Earned Income Exclusion from SSA template (<http://intra.twc.state.tx.us/intranet/vrs/docs/GM18-04D-SEIE-Request-SSA-Form.docx>).

#### Roles and Responsibilities

TWC VR contracts with each Board to purchase work readiness (employability skills) training, worksite identification, placement and monitoring, and to pay student wages and associated costs for SEAL students. Requisitions will be generated in WRAPS and invoices submitted by the Boards to the VR Program Policy and Support mailbox ([vrpps@twc.state.tx.us](mailto:vrpps@twc.state.tx.us)). Processing of invoices for payment will be handled by TWC VR staff. As mentioned above, local VR staff is responsible for service authorizations if additional supports on the worksite are needed, including transportation.

Local VR staff work in partnership with each Board, via a joint planning committee, to identify students who might benefit from the program, to conduct outreach and recruitment activities, to identify worksites, and to provide any additional services needed for the students to successfully complete the program.

While Boards are responsible for certain components and contract deliverables of SEAL, VR staff will continue to be fully responsible for performing certain functions to support the program and ensure its success for participating students.

The VR counselor’s role is to provide support. If there is an issue identified, the VR counselor will be brought in to address and resolve the issue. Additional roles and responsibilities of the Boards and VR staff are discussed in in the Board VR Requirements Manual SEAL Chapter 1 (<http://www.texasworkforce.org/partners/board-vr-requirements/summer-earn-and-learn>).